Florida Power
CORPORATION

July 19, 1985
3F0785-24

Dr. J. Nelson Grace
Regional Administrator, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30323

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 85-21

Dear Sir:

Florida Power Corporation provides the attached as our response to the subject inspection report.

Sincerely,

W. S. Wilgus
Vice President
Nuclear Operations

AEF/feb

Attachment



IE01

FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 85-21

DEVIATION 85-21-01

Final Safety Analysis Report (FSAR) section 8.2.3.1 describes the operation of the emergency diesel generator air start system and specifies that the air start system will provide starting air at 225 - 250 psig and that sufficient air is stored in the air reservoirs for six successive start attempts.

Contrary to the above:

- Procedures SP-301 (Shutdown Daily Surveillance Log), SP-300 (Operating Daily Surveillance Log), and SP-354A/B (Emergency Diesel Generator Monthly Test) allow emergency diesel generator air start system pressure to be a minimum of 215 psig;

- On March 29, 1985, the air start system pressure for the "A" Emergency Diesel Generator (EDG-3A) was observed to be at approximately 200 psig; and,

- The licensee is unable to provide justification that six successive start attempts could be accomplished at these reduced air start system pressures.

RESPONSE

Florida Power Corporation's Position

Florida Power Corporation (FPC) acknowledges that the FSAR refers to the capability to start the diesel six times successively. FPC has had our A/E and the EDG manufacturer review the basis for this statement and have concluded that this statement was an overly specific general characteristic of the EDG which was not intended to be part of the design/licensing basis of CR-3. It was part of an extensive discussion of EDG characteristics provided in response to a NRC request for additional information (RAI). Neither the RAI nor NRC positions available in FPC files indicate that six was considered to be a design value. Nevertheless, we recognize that deviations from FSAR descriptions are appropriately characterized as deviations.

A review of the Shutdown Daily Surveillance Log, SP-301, for March 29, 1985, indicated that the EDG "A" starting air pressure was within allowable limits when checked by Operations personnel on each of the three shifts that day.

Corrective Action

The three procedures were revised to state a minimum pressure of 225 psig to reflect the FSAR commitment. These revisions were completed in May 1985.

Corrective Action to Prevent Recurrence

A Field Problem Report was submitted to Site Nuclear Engineering on May 21, 1985 to:

1. Change the low pressure alarm from 150 psig to 225 psig (to alarm on decreasing pressure).

2. Change the air compressor start switch setpoint from 225 psig to 230 psig.

FPC has been working with our A/E and NSSS vendor to better define and document the design/licensing basis of the plant. This information will be used to evaluate further needs to update the FSAR pursuant to 10 CFR 50.71 and 50.59. FPC anticipates including this particular change (deletion of references to EDG successive start capability) in the 1986 update.