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**Florida  
Power**  
CORPORATION

July 16, 1985  
3F0785-20

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. 85-07  
Supplemental Response

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

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FLORIDA POWER CORPORATION  
RESPONSE  
INSPECTION REPORT 85-07  
SUPPLEMENTAL RESPONSE

VIOLATION 85-07-02

10 CFR 50, Appendix B, Criterion V, as implemented by Florida Power Corporation (FPC) Quality Program, requires that activities affecting quality be prescribed by adequate procedures. Section 1.7.1.17 of the FPC Quality Program specifies, in part, that Quality Assurance Records are records required by Technical Specifications (TS). TS 6.10.1.a requires that records of facility operation covering time intervals at each power level shall be retained for at least five years. Administrative Instruction (AI) 1100, "Retention of Plant Operating Records", implements the requirements of Section 1.7.1.17 of the FPC Quality Program and identifies records that will be collected, stored and maintained as Quality Assurance Records.

Contrary to the above, as of February 14, 1985, AI 1100 was inadequate because it failed to fully implement Section 1.7.1.17 of the FPC Quality Program in that it did not address the disposition of records required by TS. Consequently, printouts of computer monitored data, used to evaluate operational transients and constituting records of facility operation under TS 6.10.1.a, were not collected, stored and maintained as Quality Assurance Records.

This is a Severity Level V Violation (Supplement I).

RESPONSE

(1) Florida Power Corporation's Position:

FPC agrees with the stated violation in that AI-1100 failed to fully implement Section 1.7.1.17 of the FPC Quality Program.

(2) Apparent Cause of Violation:

The apparent cause of this violation is administrative oversight in that the document upon which AI-1100 is based (Final Safety Analysis Report (FSAR) Section 1.7.1.17) was revised without a revision being made to AI-1100 to reflect the updated information.

(3) Corrective Action:

AI-1100 will be revised to reflect the current FSAR record retention requirements.

(4) Action Taken to Prevent Recurrence:

In January 1985, Florida Power Corporation developed a mechanism which requires review of commitments prior to procedure revision. This system enables the originator of a procedure revision to ensure the procedure implements all applicable commitments.

(5) Date of Full Compliance:

AI-1100 will be revised by August 30, 1985.