

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

October 28, 1996
3F1096-25

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Subject: Supplemental Response to NRC Integrated Inspection Reports 96-08 and 96-09

Reference: A. NRC to FPC letter, 3N0996-07, dated September 12, 1996
B. NRC to FPC letter, 3N1096-03, dated October 4, 1996
C. FPC to NRC letter, 3F1096-07, dated October 14, 1996

NRC Integrated Inspection Reports (IR) 50-302/96-08 and 50-302/96-09 (References A & B, respectively), commented on several areas of weakness in addition to several notices of violations. The purpose of this letter is to inform you of our efforts to address these weaknesses and to briefly give a status of the planned improvements. A response to the violations contained in IR 96-08 has already been sent under a separate letter (Reference C). Likewise, the violations in IR 96-09 will be responded to in separate correspondence.

IR 96-08

The report noted some concerns as to why AP-510, "Rapid Power Reduction" was not utilized. The operators were not comfortable on the use of AP-510 as this was a new procedure for which they had not yet received simulator training. All of the crews have now been trained on the use of this procedure and the new AP-604, "Waterbox Tube Failure" procedure.

The Operations Self Assessment was found to be of insufficient depth because no findings were identified (although some valuable areas for improvement were identified). FPC's use of self-assessments is being closely reviewed by management. The new manager in the Quality Programs Department is working toward proceduralizing self-assessments to make them consistent, broad enough to

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identify rooted programmatic issues, and to ensure issues requiring corrective action are tracked in the formal corrective action process.

A weakness was identified in the tracking of audit findings in the Problem Report (PR) tracking system. The PR system is being totally revamped to a single, graded approach. The tracking of corrective actions will also be part of this total upgrade. The new PR system will also resolve the NRC's concern with the Quality Assurance Audit which failed to identify that two precursor cards should have been characterized as problem reports. This upgrade is scheduled to be implemented in November, 1996.

A weakness was identified in the way maintenance personnel communicated to operators in the control room when surveillance activities were conducted. Although we were disappointed in the performance of the maintenance technician, we were pleased that the operator held to the standard and challenged the poor communication. FPC is continuing to address communication standards in departments outside of Operations and to hold individuals accountable for proper protocol.

IR 96-09

A continuing trend in poor unit performance due to secondary side equipment was identified. Presently, Crystal River Unit 3 is in Mode 5 due to some design issues. During this outage, a concerted effort to improve the material condition of the secondary plant is underway. Goals have been established and the intent is to start up with a highly efficient and reliable secondary plant. Many of the identified performance problems have been with two specific systems, the condensate and circulating water systems. Each of these systems will get a high level of scrutiny during the shutdown period.

Another secondary problem mentioned was water in the electrohydraulic fluid for the turbine generator. The root cause evaluation has identified this as not being a problem but rather a very efficient, new purifier removing moisture from the fluid system as was expected.

A Problem Report concerning reactor coolant pressure being below DNB limits identified unclear management expectations in regard to maintenance of primary plant parameters during events. While removing the turbine from service during the rapid shutdown of the plant caused by degraded vacuum, the operators noticed an increasing trend in secondary pressure. Concerned with lifting the main steam safety valves, the operators decreased reactor power too rapidly causing reactor system pressure to be below DNB limits a short period of time. Management expectations and procedural guidance have been reviewed. The expectation that maintaining primary system parameters has the highest priority has been clarified.

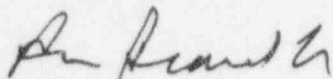
The Employee Concerns program was inspected and found to be a strength. However, several weaknesses were identified for which FPC is actively pursuing corrective actions.

- o The large number of concerns from the Security area was the result of downsizing the force, the Security system upgrade, and a change in management all of which occurred during a finite period of time. The trend of concerns are being closely monitored by management and corrective actions to address these have been taken.

- o The SBI corporate employee concerns program has been reviewed and a feedback mechanism established so FPC management can monitor the trends on a quarterly basis.
- o Procedural changes are in progress to link the Problem Report system to the Employee Concerns system and to ensure the Employee Concerns package clearly indicates whether the concern is substantiated or not.
- o The Employees Concerns representative has made it a practice to ensure timely and thorough follow-up with concerned individuals based on the results of the investigations and on any delays that may have been incurred.

We appreciate the identification of areas needing improvement in the NRC inspection reports. We will continue to address each weakness noted through our corrective action program and keep you informed of our results.

Sincerely,



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