

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

February 7, 1997
3F0297-12

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

Subject: Supplemental Response to NRC Integrated Inspection Report 96-17

Reference: A. NRC to FPC letter, 3N1296-22, dated December 23, 1996

NRC Integrated Inspection Report (IR) 50-302/96-17 (Reference A) commented on several areas of weakness in Operations, Engineering, and oversight activities. The purpose of this letter is to inform you of our efforts to address these weaknesses and to provide a status of the planned improvements.

In general, we believe the overall findings in the report are an indication that improvement is being realized in our programs and organization. Weaknesses were identified, however, in the area of operations briefings, control of overtime, and equipment out-of-service log keeping. In the area of management oversight, comments were made regarding adherence to expectations for Design Review Boards, the conduct of the Nuclear General Review Committee (NGRC), and in our plans for training line organizations on self assessment techniques.

The inspection report described a weakness in the pre-job briefing for a significant evolution. Operations performs pre-job briefings in accordance with Operations Instruction, OI-14 "Evolution Briefings". This standard clearly states the purpose of the pre-job briefing is to make each individual involved in the activity fully aware of the job scope and personal responsibilities. The supervisor is responsible for ensuring the briefing is performed in accordance with the standard. In the particular case mentioned in the inspection report, the supervisor failed to ensure all involved individuals were present. This was a failure on the supervisor's account and the supervisor has been counselled. A review of the OI did not reveal any required improvements to the standard.

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Regarding the comment on control of overtime, Operations management received feedback from the Operations staff during the outage that overtime was not well controlled or communicated. The need for overtime during a major outage can arise with little notice. Operations management assigned one SRO to each shift (days and nights) to manage the operators' schedule. Once established, this action significantly reduced the negative feedback regarding overtime. The Operations department currently has one full time scheduler that reports to an Operations manager to communicate schedule changes and their reasons. Control of overtime is important to the safe operation of the plant and Operations management continues to monitor this issue closely.

The Operations department has developed new guidelines for the use of the equipment out-of-service log. The department performed the following activities:

- o polling other utilities for ideas
- o review of INPO documentation
- o survey Shift Supervisors for ideas

From the above activities, we developed a set of criteria to be used in all modes of operation for determination of equipment needing to be tracked in the out-of-service log. This criteria is currently being added to the administrative instruction for implementation.

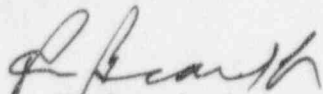
The inspection report identified some comments regarding management oversight activities. The conduct of the Design Review Board (DRB) was being governed in the interim by memorandum issued by the Manager, Nuclear Operations Engineering. Prior to the meeting attended by the NRC inspector, the Manager, NOE decided that the mechanical and structural engineering disciplines were not needed at the meeting. Thus, exception was granted to the expectation of full attendance of all engineering disciplines at DRB's as stated in the memorandum. In retrospect, the memorandum should have provided the DRB Chairman sufficient flexibility to adjust attendance based on the issues to be discussed. The new standard for DRB's has been issued and contains the flexibility consistent with this interpretation. We are aggressively issuing the remaining standards to ensure expectations are clear and visible such that desired conduct of business at Crystal River is both correct and consistent.

Another comment on management oversight regarded observations of meetings held by the NGRC subcommittees. These comments questioned the depth, breadth, and value added by questions of committee members as they conducted business. The inspector's comments were passed along to the appropriate NGRC subcommittee for discussion at the January 14-15 meeting at Crystal River. The subcommittees have been restructured with new members, both internal and external, and each subcommittee is now chaired by an external member. The new members were carefully chosen for their mix of experience and questioning attitude to improve the value of the reviews by the general committee.

The inspection report also noted that there did not exist plans for training line organizations in conducting self assessments as described in the recent revision to Nuclear Operations Directive, NOD-45, Management Self Assessments and Performance Monitoring. While it is believed the guidance provided in NOD-45 is generic enough to be applied without extensive training, a training package containing some of the fundamental concepts behind the directive is being developed for delivery to supervisors. Also described in the training is the application of these fundamental concepts as seen in a variety of self-evaluation techniques used at other Region II plants.

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,



P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

PMB/GHH

xc: NRR Project Manager
Regional Administrator, Region II
Senior Resident Inspector