



Florida Power

CORPORATION

Crystal River Unit 3

Docket No. 50-302

November 12, 1996
3F1196-21

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

Subject: Forwarding Requested Information

Dear Sir:

Enclosed is information requested by the NRC during our meeting of October 31, 1996 regarding Engineering issues at Florida Power Corporations' Crystal River Unit 3. Three documents are provided:

Independent Design Review Panel Report, dated October 15, 1996

Follow-up letter on the Independent Design Review Panel Report, dated October 28, 1996

Management Corrective Action Plan, Phase II (MCAP II), dated October 31, 1996

Please note that the MCAP II document provided herein contains two additional pages that were inadvertently omitted from copies distributed at the meeting. These are the two pages immediately following the "Statement from P. M. Beard, Jr. to Nuclear Operations Personnel," containing the Introduction and Overview, Expected Results, and Planning Assumptions.

Should you have any questions regarding this information please contact Brian Gutherman, Manager, Nuclear Licensing at 352-563-4566.

Sincerely,

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

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AD001/1

xc: Regional Administrator, Region II
NRR Project Manager

Senior NRC Resident Inspector
Johns Jaudon, Region II

October 28, 1996

Dr. Pat Beard
Senior Vice President
Nuclear Operations
Florida Power Corporation
15760 West Power Line Street/SA2C
Crystal River, FL 34428-6708

Dear Dr. Beard:

This letter is to clarify the report of the Independent Design Review Panel dated October 15, 1996, which was discussed in my forwarding letter of the same date. The report was presented to you and others on October 25th. At that time the report was discussed at some length and Jim Lash (a Panel member) and I responded to numerous questions and comments from those present.

After considering the questions, I offer the following clarifications in order to better convey the results of the panel's review:

- 1) The panel did not attempt to make a safety evaluation. However, the Panel was conscious of potential safety implications and encouraged FPC to make an assessment of the cumulative safety implications of the Design Basis LER's.

The Panel did not see a basis for a significant safety concern. This is based on consideration of all the Panel's activities as described in the report, including review of numerous documents, interviews of over 30 people, review of Crystal River Design Basis LER's from January 1992 to June 1996, the results of INPO's assessment of the significance of those LER's, FPC's assessment of the individual and cumulative safety significance of the LER's, and review of a sample of CR-3 problem reports (precursors to LER's).

The final paragraph in Section C, page 4, made a similar observation about safety significance but, by its language and location in the report implied a much narrower, more limited basis for this observation.

- 2) At our meeting, the significance of the number of recommendations was questioned. As I stated then, no significance should be attached to the number of recommendations.

As described in the report, the committee used the 17 questions in its Charter as a framework for many of its activities. Since we were responding to your request to provide a report that would be useful to FPC in its continuing efforts to improve, we decided to develop very specific recommendations in response to each question and to include each and every recommendation in the Executive Summary. A good many of the recommendations could have been grouped since they have similar thrusts. For example, recommendations 18-22, 24, and 25, all of which call for adding guidance regarding the Design Basis in a variety of procedures, could have been combined. Similarly, recommendations 31-34 which address improvements in safety evaluations, could have been combined. This might have avoided the question.

The Panel believes its report makes each recommendation clear in a way most useful to FPC.

- 3) The framework the Panel used for its work (as discussed in 2 above) also resulted in the Panel's comments relative to FPC and industry practices being spread through the report; we did not attempt to capture them in the Executive Summary as we did with the recommendations.

The Executive Summary does include the following pertinent statements:

Past initiatives by FPC related to improving its knowledge and documentation of the CR-3 Design Basis were significant and were reviewed by the Panel. Current FPC initiatives related to Design Basis information were also reviewed. These efforts have identified and in many cases started to address a number of the areas addressed by the Panel. An attempt has been made to recognize these FPC initiatives in this report.

We note that as a result of the recent increased attention on Design Bases, Final Safety Analysis Reports (FSAR), 10CFR50.59, etc., all of the licensees represented on the Panel are reviewing or planning to review some or all of their Design Basis related programs for possible improvement.

As noted above, the regulatory and industry guidance related to Design Basis is relatively limited. The Panel has recommended some significant changes and enhancements to FPC processes and practices relative to Design Basis. No implications are seen by the Panel or should be drawn regarding other areas of CR-3.

The Panel developed its conclusions and recommendations against its judgement of excellence or best practices, not just against regulatory requirements.

Additional pertinent comments included in the report under the Observations on each of the questions are:

Review indicates the scope and content of the CR-3 Design Basis documentation is generally consistent with industry practices and regulatory guidance except as noted above.

The panel concluded that, in other than a few specific areas, Design Bases information is well understood by Systems and Design Engineering personnel.

There was broad agreement that the combination of EDBDs, FSAR, and Technical Specifications (along with occasional reliance on other sources) provides a high confidence level that most any Design Bases issue can be completely addressed.

Design Bases issues that are most difficult to address involve instances where early information and assumptions were not thoroughly documented during early plant design.

Examples of engineers' work that were reviewed demonstrated a good grasp of the relevant Design Bases associated with the assignment. Engineers have a good depth of understanding of Design Bases information.

I regret that the report did not convey the points above more clearly, and hope this letter clarifies the Panel's views.

It is our belief that the FPC initiative to establish the Panel places you in an excellent position to respond to the current concerns about Design Basis issues and will prove valuable to FPC as you develop your response to the recent NRC letter to all licensees on 10CFR50.54(f).

Please let me know if you have other questions or if we can provide any additional help as you proceed.

Sincerely,



Phil Clark
Chairman for the
Independent Design Review Panel