Florida Power
CORPORATION

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August 13, 1985
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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. 85-26

Dear Sir:

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

Sincerely,

W. S. Wilgus
Vice President
Nuclear Operations

DDG/feb

Attachment

FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 85-26

VIOLATION 85-26-01

Technical Specification 6.8.1 requires adherence to the Administrative and Surveillance procedures.

Administrative Instruction (AI) 600, Conduct of Maintenance, specifies that equipment clearances be obtained in accordance with Compliance Procedure (CP) 115, In-Plant Equipment Clearance and Switching Orders, and that Work Requests (WRs) be issued in accordance with CP-113, Procedure for Handling and Controlling Work Requests and Work Packages.

CP-113, paragraph 5.3 requires the WR be signed by the Nuclear Shift Supervisor (NSS) before work is begun.

CP-115, paragraph 5.8.2 requires a copy of the accepted clearance to be at the job site.

Surveillance Procedure (SP) 210, ASME Class 2 and 3 Hydrostatic testing, requires the following:

- No valves shall be installed in any lines going to temporarily installed relief valves and pressure gauges (paragraph 4.2) and,

- Hydrostatic test boundary valves shall be established as listed on Data Sheet Enclosure 2 (paragraph 7.4).

Contrary to the above; on June 13, 1985, while performing a hydrostatic test of the Nuclear Services Seawater (RW) System, the following items were identified.

- The WR used to authorize the performance of the hydrostatic test was signed by the NSS on June 12, 1985, even though work was begun on the system on June 11, 1985.

- The equipment clearance under order #6-10 was amended and a copy of the amended order was not at the job site.

- The test was conducted with isolation valves installed in the lines leading to each pressure gauge and the relief valve.

- Hydrostatic test boundary valve RWV-14, that was listed on Enclosure 2 as a boundary for the test volume, was not the actual boundary valve since upstream valve RWV-6 was left shut.

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

RESPONSE

1) FLORIDA POWER CORPORATION'S POSITION

Florida Power Corporation agrees with the stated violation in that:

A) Written objective evidence of approval for the work request could not be found,

B) A copy of the amended clearance order was not at the job site,

C) The test was conducted with isolation valves installed in the lines leading to each pressure gauge and the relief valve, and

D) RWV-6 was not in the open position.

2) APPARENT CAUSE OF VIOLATION

A) On June 11, 1985, the pipefitter foreman reported that the work request was lost.

B & C) The cause of these occurrences was failure to follow procedure.

D) The misposition of RWV-6 was due to miscommunication between the test supervisors and workers in the field.

3) CORRECTIVE ACTIONS

A) A search of all likely locations for the work request was conducted with negative results. A new work request was made from a copy of the missing work request and required approvals were documented.

B) A letter was sent to all Site Nuclear Operations personnel emphasizing the procedural requirements to maintain a copy of the current clearance order with the appropriate work request at the job site.

C) Both the test supervisor and assistant test supervisor were counseled regarding the need to follow procedure.

Procedure for ASME Class 2 and 3 hydrostatic testing has been revised to modify hydrostatic test rig requirements. Provisions for a snubbing device or alternate device, and signoffs to verify the correct rig is included.

D) The test supervisor and the assistant test supervisor were counseled regarding the need for precise communication.

4) ACTION TAKEN TO PREVENT RECURRENCE

A) The above action is considered adequate to prevent recurrence.

B) The clearance order form will be revised to state that a copy of the clearance order must be present at the work area.

C) Switching and tagging training will emphasize the requirements of the revised clearance procedure.

D) Corrective action as stated above is considered adequate to preclude recurrence.

5) DATE OF FULL COMPLIANCE

Full compliance is scheduled to be completed by October 31, 1985.

VIOLATION 85-26-05

10 CFR 50, Appendix B, Criteria V and X, as implemented by the approved Florida Power Corporation (FPC) Operational Quality Program, requires the following:

- Paragraph 1.7.1.5 of the FPC Quality Program implements the requirements of Criteria V and requires written procedures for the performance of work affecting quality and requires adherence to these procedures.

- Paragraph 1.7.1.10 of the FPC Quality Program implements the requirements of Criteria X and requires an adequate inspection of the activities being inspected.

Contrary to the above, on June 20, 1985, plant modification procedure (MAR) 85-03-13-01 was not adhered to in that eight concrete anchor bolts, which were required to be tightened to a torque of 40 to 45 foot-pounds, were only torqued to 25 foot-pounds. In addition, the inspection of this modification was inadequate since the inspector failed to identify the incorrect torque values.

This is a Severity Level IV violation (Supplement I).

RESPONSE

1) FLORIDA POWER CORPORATION'S POSITION

Flordia Power Corporation agrees with the stated violation in that a plant modification procedure was not adhered to. Eight concrete anchor bolts, which were required to be tightened to a torque of 40 to 44 foot-pounds, were only torqued to 25 foot-pounds. FPC further agrees that the inspection of this modification was inadequate since the inspector failed to identify the incorrect torque values.

2) APPARENT CAUSE OF VIOLATION

On June 20, 1985, various inspections were being performed on relay cabinets identified as RR-3A and RR-3B. Specific work activities involved the installation of seismic supports per Work Package #67751. After the torque operation and subsequent inspection, the NRC reviewed the package sign-offs which revealed incorrect torque values applied. The cause appears to be personnel error. Torque values used by both craft and the Quality Control Inspector were those applied to Phillip's wedge anchors. The actual anchor bolts installed were Maxi-Bolts. The Phillip's wedge anchors are by far the largest percentage of anchors installed with torque values of 25 foot-pounds, while Maxi-Bolt installation is less frequent. In addition, discussions revealed that the inspection turnover contributed to this event.

3) CORRECTIVE ACTIONS

Immediate corrective action in the field was to re-torque the bolts in question to the correct values and re-inspect. This was performed subsequent to the error identification and currently meets design requirements imposed in the work package.

A detailed discussion was held with the two inspectors involved. The results of these discussions indicate a high degree of familiarity with the torque requirements specified in MOP-408. The inspection sequence normally completed by one inspector would also include inspection of hole drilling and minimum embedment depth that would have prevented this occurrence.

In order to assure familiarity with torque requirements for both Phillip's wedge anchor bolts and Maxi-Bolts, training was completed for all inspectors in the inspection plan for anchor and bolt requirements, as well as the torque value criteria identified in MOP-408, "Installation of Concrete Anchor Bolts."

Additionally, a review of installation records was performed to verify application of proper torque. The results of this review indicate that all safety-related installations of Drillco Maxi-Bolts (approximately 150 bolts) were conducted to specified torque requirements.

4) **ACTION TAKEN TO PREVENT RECURRENCE**

In addition to the corrective actions above, the concrete anchor installation record was revised to require the field engineer to specify the required torque value for each anchor bolt. This record will be added to the procedure for concrete anchor bolt installation.

5) **DATE OF FULL COMPLIANCE**

Full compliance will be achieved on or before September 1, 1985.