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AUG 28 1985

Florida Power Corporation
ATTN: Mr. W. S. Wilgus
Vice President Nuclear Operations
P. O. Box 14042, M.A.C. H-2
St. Petersburg, FL 33733

Gentlemen:

SUBJECT: REPORT NO. 50-302/85-15

Thank you for your response of June 14, 1985, to our Notice of Violation issued on May 17, 1985, concerning activities conducted under NRC Operating License No. DPR-72.

We have reviewed your response to Violation 1 and have concluded, for the reasons presented in the enclosure to this letter, that the violation occurred as stated in the Notice of Violation. The NRC observed and documented in the inspection report that several QA audit findings were not being resolved on a timely basis. Therefore, we conclude that previously established measures were inadequate. Therefore, in accordance with the requirements of 10 CFR 2.201, and within 30 days of the date of this letter, please resubmit your response to the Notice.

We have examined your response to Violation 2 and found that it meets the requirements of 10 CFR 2.201. We have evaluated your request to change the assigned severity level. Although a single example was the basis for the violation, failure to promptly resolve an audit finding in accordance with established procedures is a failure to meet a regulatory requirement that had more than minor safety significance. We understand that FPC has since identified other audit findings and determined that these will be made nonconformance reports. The correct severity level was assigned. We will examine the implementation of your corrective actions during future inspections.

We have examined your response to Violation 3 and agree that imposition of this violation will be withheld pending further NRC review of this issue. This item will be considered as unresolved.

We have examined your response to Violation 4 and agree with the FPC position and have deleted the violation from our records.

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Should you have any questions concerning this letter, we would be happy to meet with you and discuss the matter further.

Sincerely,

(Original signed by JNGrace)

J. Nelson Grace
Regional Administrator

Enclosure:
Staff Evaluation of
Licensee Response

cc w/encl:

- ✓ E. M. Howard, Director
Site Nuclear Operations
- ✓ P. F. McKee, Nuclear Plant Manager
- ✓ G. R. Westafer, Manager
Nuclear Operations Licensing
and Fuel Management

bcc w/encl:

- ✓ NRC Resident Inspector
- Document Control Desk
- State of Florida

See Previous Concurs.

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CMUpright
7/ /85

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CAJulian
7/ /85

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AFGibson
8/9/85

RII

VPanciera
8/20/85

RII

VLBrownlee
8/2/85

RII

RDWalker
8/26/85

RII

GRJenkins
8/21/85

RII

JAOrshinski
8/29/85

Enclosure:
Staff Evaluation of
Licensee Response

cc w/encl:
E. M. Howard, Director
Site Nuclear Operations
P. F. McKee, Nuclear Plant Manager
G. R. Westafer, Manager
Nuclear Operations Licensing
and Fuel Management

bcc w/encl:
NRC Resident Inspector
Document Control Desk
State of Florida

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ENCLOSURE

STAFF EVALUATION OF LICENSEE RESPONSE
DATED JUNE 14, 1985

Violation 1 cites the requirements of 10 CFR 50, Appendix B, Criterion XVI, for the failure of Florida Power Corporation (FPC) to establish measures to assure that conditions adverse to quality are promptly corrected. The citation attributes this failure to inadequate procedures for escalating unresolved QA audit findings to higher management for resolution. The FPC response denies this violation on the contention adequate escalation procedures have been provided. The response correctly states that there are no NRC guidelines with respect to when escalation is required.

We acknowledge that there are no NRC escalation guidelines and that the specific guidelines stated as part of the cited violation are not formal regulatory requirements. However, we observed and documented in the inspection report that several QA audit findings had not been resolved on a timely basis. Therefore, we conclude that your previously established measures were not adequate to meet 10 CFR 50, Appendix B, Criterion XVI.