



85 SEP 6 PI2: 35

**Florida
Power**
CORPORATION

August 30, 1985
3F0885-23

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. 85-08, Supplemental Response

Dear Sir:

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

Sincerely,

G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

AEF/feb

Attachment

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FLORIDA POWER CORPORATION
SUPPLEMENTAL RESPONSE
INSPECTION REPORT 85-08

VIOLATION 85-08-02

Technical Specification 3.7.4.2 requires two independent Decay Heat (DH) seawater loops to be operational when the plant is in operating modes 1 through 4.

Procedure OP-404 directs the operation of the DH Removal System and specifies in paragraph 11.0 of this procedure the valve lineup that provides the Engineered Safeguards (ES) normal standby mode of the DH Seawater System. This valve lineup requires the seawater train isolation valve to the discharge canal, RWV-40, and the discharge line cross connect valves, RWV-32 and RWV-33, to be open.

Contrary to the above:

- a. On February 22, 1985, an improper procedure change to OP-404 resulted in RWV-40 being closed for approximately 94 hours.
- b. As found on February 22, 1985, procedure OP-404 was inadequate in that the requirement to have both cross connect valves (RWV-32 and RWV-33) open defeated the independent status of the DH seawater loops. As a result, two independent DH seawater loops were not available for the duration of the last operating cycle which extended from July 1983 through March 11, 1985.

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

RESPONSE

1) FLORIDA POWER CORPORATION POSITION

- a. Florida Power Corporation (FPC) agrees with the stated violation that RWV-40 was improperly repositioned.
- b. Florida Power Corporation denies that OP-404 was inadequate or that it allowed the independent status of the DH seawater loops to be defeated. FPC understands that the DH seawater piping was not designed or intended to be operated with the discharge pipes isolated from each other. FSAR Section 9.5.2.1.2 which states, in part, "The following cases generally cover the safeguards against the major contingencies anticipated.... Two full size redundant 48 inch discharge pipes with piping and valving arrangements inside the building to route the water discharged from the nuclear services and decay heat services heat exchangers to either or both of the discharge pipes" supports this contention. (Emphasis added.) Also FSAR Section 9.5.2.2 states, in part, "Seawater is circulated from each of the decay heat services seawater pumps through separate supply lines and decay heat closed cycle heat exchangers, and discharged to the two 48-inch discharge pipes."

In order to prevent future misinterpretation of this Technical Specification, FPC will propose a change to the wording of the Technical Specification to clearly describe the design of the decay heat seawater discharge piping consistent with the FSAR.

2) APPARENT CAUSE OF VIOLATION

Improper administrative guidance was provided to Operations Department Personnel that allowed valve alignment different from that required in the Operating Procedure through the use of equipment clearance orders.

Subsequently, the use of an equipment clearance order to modify system flow paths for purposes other than maintenance of an inoperable or degraded component was determined to be inappropriate.

3) CORRECTIVE ACTION

An administrative guideline has been issued to restrict the use of CP-115, In-Plant "Equipment Clearance and Switching Orders." Changes to system valve line-ups for purposes other than maintenance of a degraded system or component will be accomplished by a temporary or permanent procedure change.

4) CORRECTIVE ACTION TO PREVENT RECURRENCE

The above corrective action is sufficient to prevent recurrence.

5) DATE OF FULL COMPLIANCE

An administrative guideline was issued on June 25, 1985.