

NOTICE OF VIOLATION

Florida Power Corporation Docket
Crystal River Unit 3

No. 50-302
License No. DPR-72

During NRC inspections conducted on January 12 through February 22, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion V, Instruction, Procedures and Drawings, requires in part, that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances.

Contrary to the above, as of February 6, 1997, the licensee failed to prescribe quality related clearance tagging activities into an appropriate procedure in that Compliance Procedure 115, Nuclear Plant Tags and Tagging Orders, Revision 73, was inadequate because it did not require local tagging of valves or components and gagging of air-operated valves for red tag clearances. This inadequacy resulted in a valve being repositioned while under a red tag clearance.

This is a Severity Level IV Violation (Supplement 1).

- B. Technical Specification 5.6.1.1 requires, in part, that procedures be implemented covering activities as recommended in Regulatory Guide 1.33, Appendix A, Revision 2, dated February 1978. Appendix A recommends administrative procedures to cover the authorities and responsibilities for safe operation and shutdown, procedure adherence and temporary change method. The licensee implemented the above Appendix A recommendations, in part, through Procedure AI-500, Conduct of Operations and OI-09, Operations Procedures. OI-09 requires that activities will be performed in accordance with approved instructions.

The licensee's modification functional test procedure, Modification Approval Record 96-10-05-01, Test Procedure-1, Attachment A, states that after the emergency diesel engine has been stopped for at least 15 minutes, but not more than 20 minutes, steps 4.6.30 through 4.6.34 should be performed. Step 4.6.30 trips the fuel racks, which should prevent an inadvertent diesel start while rolling it with air.

Contrary to the above, on February 1, 1997, a non-licensed plant operator failed to follow instructions contained in licensee procedure Modification Approval Record 96-10-05-01, Test Procedure-1, Attachment A for restoring the emergency diesel generator EDG-1A, following the functional test. Specifically, several steps, including 4.6.30, were not completed as required, resulting in an unplanned start of the emergency diesel generator.

This is a Severity Level IV Violation (Supplement 1).

- C. Technical Specification Surveillance Requirement 3.7.13.1 requires that the licensee verify the fuel storage pool water level is ≥ 156 foot plant

datum once per 7 days during movement of irradiated fuel assemblies in the fuel storage pool.

Contrary to the above, between August 1994 and November 1996, on five occasions during irradiated fuel movement, the licensee failed to perform a valid surveillance test, in that instruments, SF-1-LT1 and SF-1-LT2, used to verify fuel storage pool water level, were not within their allowable calibration intervals. Subsequent calibrations revealed that SF-1-LT1 was outside the acceptance criterion and could not be calibrated within it, and SF-1-LT2 was found with a significant zero offset, but was able to be calibrated within acceptance criteria.

This is a Severity Level IV Violation (Supplement 1).

- D. 10 CFR 50, Appendix B, Criterion III, Design Control, requires measures that assure that the applicable regulatory requirements and design basis for safety-related components are correctly translated into specifications, drawings, procedures, and instructions. When this translation is accomplished through calculations, the measures must assure that the assumptions and data used in performing the calculations are justified and correct.

Contrary to the above, as of February 22, 1997, the licensee's measures did not assure that the applicable regulatory requirements and design basis for safety-related components would be correctly translated into specifications, drawings, procedures, and instructions. The design assumptions for Auxiliary Building temperatures used in the Environmental and Seismic Qualification Program Manual (ESQPM) and in instrument loop uncertainty setpoint calculations were not properly translated into procedures for calibration of the instruments, the Engineering Design Basis Document, or the Final Safety Analysis Report. Additionally, there were no procedures for ensuring that the Auxiliary Building temperatures would be maintained within the ranges assumed by the ESQPM and the instrument setpoint loop uncertainty calculations.

This is a Severity Level IV violation (Supplement 1).

- E. 10 CFR 50, Appendix B, Criterion XVI requires that measures shall be established to assure that conditions adverse to quality such as deficiencies and nonconformances are promptly identified and corrected.

This requirement is implemented by Florida Power Corporation Quality Program Section 1.7.1.16, Corrective Action.

Contrary to the above, since December 1993, deficiencies and nonconformances were identified in safety related cables but were not corrected. Calculation E91-0020 identified deficiencies or nonconformances with safety-related cables MTL-117, AHC-656 and MTL-67, but as of February 14, 1997, they had not been corrected.

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Florida Power Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, at the Crystal River facility, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Atlanta, Georgia
this 24th day of March 1997