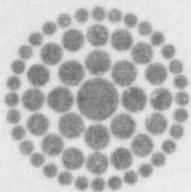


DMB



**Florida
Power**
CORPORATION

November 21, 1985
3F1185-24

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. 85-33
Supplemental Response to Violation 85-33-01

Dear Sir:

Florida Power Corporation provides the attached as our supplemental response to Violation 85-33-01 of the subject inspection report.

Sincerely,

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

AEF/feb

Attachment

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PDR ADDCK 050C0302
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IEOI

FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 85-33
Supplement

VIOLATION 85-33-01

Technical Specification 3.3.3.1 requires, in part, that the condenser vacuum pump exhaust monitor (RM-A12) be operable while in Modes 1 through 4. If this monitor is not operable, the Technical Specification requires that grab samples be collected and analyzed for gross activity at least once per 24 hours.

Contrary to the above, on August 7, 1985, monitor RM-A12 was made inoperable for maintenance and grab samples were not collected and analyzed until approximately 10:30 a.m. on August 9, 1985, a period of approximately 40 hours.

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

RESPONSE:

1) FLORIDA POWER CORPORATION'S POSITION:

Florida Power Corporation (FPC) agrees with the violation that RM-A12 was made inoperable and grab samples were not collected and analyzed within 24 hours as required by TS 3.3.3.1. This event was previously reported on LER 85-010.

2) APPARENT CAUSE:

RM-A12 monitor had undergone repair during the outage and had not yet been returned to service. The Nuclear Shift Supervisor failed to recognize that entry into Mode 4 required entry into the associated Action Statement for RM-A12. No notification was made to the Chemistry-Radiation Department that grab samples were required, and the samples were not taken on August 8, as required by the Action Statement.

The cause of this failure to recognize entry into an Action Statement is procedure inadequacy.

3) CORRECTIVE ACTIONS:

The Action Statement was logged and grab samples were commenced on a twenty-four hour frequency as required. Additionally, SP-442, Special Conditions Surveillance Plan, was amended on October 1, 1985 to specifically list "Radiation Monitor Inoperable" under inoperative equipment and Chem/Rad analysis sections. SP-442 is performed every four hours in all modes.

4) ACTION TAKEN TO PREVENT RECURRENCE:

Radiation monitoring equipment required by Technical Specification Tables 3.3-6, 3.3-12 and 3.3-13 have been labeled to require notification of the responsible

department prior to removal from service. FPC will revise SP-442 Special Conditions Surveillance Plan, to require that the Shift Supervisor review the Equipment Out Of Service Log for Technical Specification equipment required for mode changes. This procedure will be revised prior to November 27, 1985 or prior to the next mode ascension, if earlier.

5) DATE OF FULL COMPLIANCE:

Full compliance was achieved August 9, 1985 after collecting and analyzing grab samples.