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**Florida
Power**
CORPORATION

January 18, 1988
3F0188-13

Dr. J. Nelson Grace
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta St. N. W., Suite 3100
Atlanta, Ga 30323

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Systematic Assessment of Licensee Performance (SALP)
Inspection Report 87-27

Dear Sir:

The attachment to this letter provides Florida Power Corporation's (FPC's) detailed response to the subject inspection report.

At the on-site SALP presentation Mr. L. H. Scott, President and Chief Executive Officer of Florida Power Corporation, mentioned, it is human nature to believe one deserves a higher grade when one's performance is evaluated. However, if the nuclear industry is to reach the performance levels we all demand, we must look at all the data available and learn how to improve. We believe the most recent SALP of Crystal River 3 (CR-3) is an excellent opportunity for developing strategies for CR-3 to become what we believe it can be, a consistently safe, well managed, vital part of Florida's electric energy supply. We were especially pleased to receive recognition for improving our communication with your staff. This is not by accident, but is an integral part of our current management direction. We believe our staff's continued efforts, as well as those of your own, will produce a professional, meaningful and mutually beneficial dialogue and trust as we face future challenges.

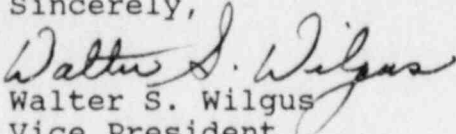
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Overall, we believe the SALP ratings were generally fair and accurate. In the attached discussion we hope to address some apparent misconceptions and to document our own self-assessment. These comments are an integral part of the Nuclear Operations Department goals for 1988 and beyond. We welcome further feedback from your office or staff and hope the attached comments serve to underscore our commitment to excellence.

Sincerely,


Walter S. Wilgus
Vice President
Nuclear Operations

WLR:mag

Attachment

FPC COMMENTS ON 1987 SALP

OVERALL EVALUATION

FPC agrees procedural adequacy and adherence is the single largest opportunity for improvement department-wide. In addition, we agree that supervisory review of completed procedures is a concern and we will continue to address this area. We do not perceive that "trying harder" will suffice, although we will continue to strive to do just that. In addition, we will look broadly at our approach to proceduralization of work activities in our efforts to find additional ways to improve. We expect your staff to be a good source for proven programs and innovative ideas, as well as a supporter for any changes to licensed programs needed to facilitate this improvement. In the next several months, we will be putting together a plan for addressing this situation. We look forward to meeting with you to share these ideas and strategies.

In certain limited areas of contractor control we agree with your assessment. We do not believe contractor control is as broad a problem as you imply. You reference the In-service Inspection/In-service Testing (ISI/IST) area as an example. The ISI/IST program, supported principally by Babcock & Wilcox (B&W), was largely managed by B&W with inadequate input from FPC. Even though few, if any, of the identified nonconformances were directly a result of B&W activities, we agree FPC should exert more effective contractor control in this area. FPC's second ten year program will be managed by FPC. We will be sharing with you in coming months the plans we have for ISI/IST management improvements. Since this is the beginning of our second ten year interval, it affords an excellent opportunity for improvements in this area.

PLANT OPERATIONS

We share your concern regarding operator overtime. We believe we can and must succeed in reducing overtime levels. We are encouraged that the staff's efforts to refocus NRC administered requalification exams appears to be directed to relieve any unnecessary additional stress. If enough operator licenses are obtained by the additional operators currently being tested by the NRC, FPC will initiate a six-shift rotation. This, in turn, will reduce operator overtime.

RADIOLOGICAL CONTROLS

We agree the adverse trend in this area noted in the previous SALP has been reversed. Some confusion existed at the presentation as to whether you intended to note an improving trend. We believe one is present and we will endeavor to further enhance this area so that no confusion will exist at the end of the present SALP period.

The comment in your report regarding transfer of an academically trained chemist appears misleading. This was a temporary assignment and did not adversely affect our chemistry section long term. In fact the support available to chemistry has been generally improved. The Once Through Steam Generator (OTSG) task force includes a degreed Chemical Engineer, who is pursuing certification as a Corrosion Engineer. Several other organizations within Nuclear Operations contain support personnel with extensive chemistry backgrounds. Further, you noted the absence of a management level commitment or policy statement associated with the Steam Generator Owners Group (SGOG) guidelines. Such a policy was endorsed by management in May 1987. We apologize for our apparent failure to keep you well informed in these areas.

MAINTENANCE

FPC appreciates the continuing positive assessment of Maintenance by the NRC. The efforts of numerous individuals, on the plant staff and within other support groups on-site and at the corporate headquarters, combined to make this achievement possible.

SURVEILLANCE

The SALP Report noted a declining trend of performance in surveillance activities. The SALP Report noted eleven violations and one deviation in the surveillance area during the evaluation period. We are in agreement that this area warrants our particular attention for 1988 and beyond. We will attempt to clarify those areas that we believe warrant increased attention. The following paragraphs also comment specifically on each of the deficient areas mentioned in your report and present FPC's plan for improvements in these areas.

1. Surveillance Scheduling

Two of the violations mentioned were a result of scheduling deficiencies. Several months ago the responsibilities of the Technical Specifications Coordinator were realigned as a result of FPC's awareness of this problem. The position has been reassigned to the Operations Planning Section to bring the function organizationally closer to the plant staff who perform most of the surveillances. The single responsibility of the Coordinator and associated clerical support is now Surveillance Scheduling. Other previous job responsibilities have been reassigned.

In addition, a new computerized Surveillance Tracking System was implemented during December 1987. This system is now being refined and utilized as the primary means of scheduling and tracking surveillance procedures. With the implementation of this new system, FPC will be able to more closely monitor and schedule surveillances. Thus, the chances of missed or overlooked requirements will be greatly reduced.

Finally, FPC plans to pursue some clarification of, or changes to, certain Technical Specification Requirements, including Technical Specification 4.0.2, which will simplify the scheduling process.

2. Procedural Adequacy

The report noted four violations and several Licensee Event Reports (LER's) which identified surveillance procedures which were determined to be inadequate in implementing requirements, or were so poorly written so as to impede successful accomplishment of the procedure.

The SALP Board concluded these deficient procedures were the result of "inexperience of the engineering staff" and writing procedures "with little or no input from the field organizations". FPC believes this has been corrected. FPC has adopted a "system engineer" concept which will identify a single point of contact, develop expertise, and instill a "pride of ownership" in all aspects of operations, testing and maintenance. This same concept is being applied in areas other than engineering for individuals responsible for various aspects of system maintenance and testing. In addition, new surveillance procedures not performed by the organization who writes the procedure, will be walked through on a dry run with the organization who will perform it prior to issuance. The writing organization will also perform field validation with the organization performing it.

In addition, FPC has developed a Surveillance Procedure Verification and Validation Program. This program will confirm the technical adequacy of surveillance procedures and ensure that surveillance procedures not performed by the organization responsible for it will be field validated at least once and re-validated after a major technical rewrite. FPC has also developed an INPO accredited Engineering Training Program to enhance the engineer's overall understanding of CR-3 plant systems and operations.

We believe the processes described above to be a strength and what you saw as a weakness was the growing pains of initiating a new technique. We plan to keep the resident NRC inspectors informed of our progress with these new concepts and programs.

3. Surveillance Procedure Adherence

The report noted three violations relating to lack of adherence to surveillance procedures. In addition to the areas described in the Overall Evaluation section, the Director of Nuclear Plant Operations meets with Plant Superintendents each month and reviews each department's procedure adherence problems with proposed corrective actions. This is done to stress the high management concern with procedure adherence. This group also reviews the actions to improve procedures in progress to ensure they are accomplishing what is expected. We agree supervisory review of completed procedures is also a concern and we will continue to address this area. Many

initiatives are in progress and, as we improve, we may discontinue some initiatives and add others. We plan to keep the resident NRC inspectors informed of our on-going programs.

4. In-Service Inspection and Testing Programs

The report noted a weakness associated with the overall management of FPC's in-service inspection and in-service testing programs. Three violations in this area were mentioned. The overall management of FPC's in-service inspection program is under review and the following actions are being taken:

- o The position of Nuclear Technical Support Superintendent was previously used to manage the OTSG Integrity Section and the In-service Inspection Section. The OTSG Integrity Section is now reporting to another manager thereby allowing the Nuclear Technical Support Superintendent to devote 100% of his time to ISI management issues.
- o The ISI Section which presently consists of three employees will be expanded to five employees, thereby reducing its dependence on contractors.
- o The overall administrative control for In-service Inspection is presently being completely rewritten. The objective of the re-write is to strengthen the controls over our ISI programs.
- o In addition to the re-write of AI-701, Conduct of In-Service Inspection, eight stand-alone ISI related program documents are under development. These include: NDE Program, Repair and Replacement Program, Pump and Valve Program, Eddy Current Test Program, Hydro Program, Surveillance Capsule Program, Snubber Program, and Leak Rate Test Program.

During 1988 FPC will begin a program to ensure ISI commitments are properly addressed in FPC's Nuclear Operations Commitment System.

The issue of contractor control was discussed in the Overall Evaluation section.

FIRE PROTECTION

We agree with the assessment by the SALP Board in this area. We would add that the efforts of Licensing, Engineering, Site Nuclear Services, Operations, Maintenance, and Construction were instrumental in the Appendix R compliance effort.

EMERGENCY PLANNING

As we read your current and past assessments in the area of Emergency Planning, and having listened to your discussion of this category at the SALP meeting, we respectfully request re-evaluation of this category to a SALP 1 rating. From our understanding, we did not receive a "1" in Training and Emergency Planning due to Team Training deficiencies. We believe it is unfair and misleading to penalize both categories for deficiencies in this area. Since Emergency Planning has been highly regarded in the past, we sincerely believe this category should be given a Rating of 1 for this SALP period.

SECURITY and SAFEGUARDS

We agree with your assessment of the progress made to date, and with the opportunity and need for continued improvement.

OUTAGES

We agree with your assessment, especially as it relates to short forced outages and longer outages driven by modifications. A major focus in 1988 will address lessons learned from the recently completed refueling outage. We believe this will go a long way toward improving FPC's performance in this area.

QUALITY ASSURANCE and ADMINISTRATIVE CONTROLS AFFECTING QUALITY

We are in agreement with your assessment of this area including strengths and weakness listed.

LICENSING ACTIVITIES

We agree with your overall assessment of Licensing as supported by related engineering efforts.

The LER assessment provided by AEOD was very helpful. Even though we are ranked in the top 10-15% we have taken the constructive criticism, as well as the other assessment guidelines, and implemented a review guide for LER's.

We believe we have been effective in improving communication with the staff and our plans to develop resolution strategies for all outstanding items have been well received by the staff. We look forward to continued improvement in this area.

TRAINING AND QUALIFICATION EFFECTIVENESS

We are in agreement with your assessment. We will continue to analyze our performance and make improvements in all areas of Training whenever an opportunity exists to do so.

CONCLUSION

Although we have provided some different perspectives in several areas which will help make the record more accurate, we do agree with your overall assessment of our performance, with the exception of Emergency Planning, which we believe to be more properly assessed as a category 1.

We commend you on the open dialogue we have had on the SALP process via the American Nuclear Society's Utility/NRC Interface Workshops and believe the staff is contemplating many potentially significant improvements in this assessment system. Additionally, we wish to commend you and offer our support of the new concept you have initiated of holding the SALP review meetings at the Plant Site and encouraging large attendance of utility personnel at these meetings.