NOTICE OF VIOLATION

Florida Power Corporation
Crystal River Unit 3

Docket No. 50-302
License No. DPR-72

During NRC inspections conducted on February 23 through March 29, 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. Technical Specification (TS) 5.6.1.1, Procedures, requires that written procedures be established, implemented, and maintained for the activities recommended in Appendix A of Regulatory Guide 1.33, Quality Assurance Program Requirements, Revision 2, February 1978. This includes procedures required for the operational alignment and control of safety-related equipment.

Operating Procedure (OP) 404, Decay Heat Removal System, Revision 104, requires Nuclear Services Cooling System Vent Valve RWV-73 to be closed for normal operations.

Procedure OP-414, Nitrogen and Hydrogen Systems, Revision 34, requires Valve NGV-313 to be open for normal operations.

Procedure OP-411, Instrument and Station Air System, Revision 53, requires the valves in the instrument air flow path to Makeup System (MU) Valve MUV-243 to be in the open position for normal operations. Procedure OP-402, Makeup and Purification System, Revision 90, requires MUV-243 to be in the open position for normal operations.

Procedure OP-411, Instrument and Station Air (SA) System, Revision 53, requires Station Air Valve SAV-49 to be in the open position for normal operations.

Procedure OP-422, Turbine Building Sump Oil-Water Separator, Revision 8, requires Vent Valves SDV-107, 108 and 109 to be closed for normal operations. Section 4.2, Fill and Vent, requires the manipulation of SDV-107, 108, and 109 as vent isolation valves.

Surveillance Procedure (SP) SP-607, Fire Damper Inspection, Revision 18, Step 4.4 requires the restoration of fire damper (FD) power links for FD-47 and FD-83 to the closed and connected position.

Procedure OP-408, Nuclear Services Cooling System, Revision 84, requires Spent Fuel Cooler A Outlet valve SWV-23 to be sealed and throttled two turns open and Spent Fuel Cooler B Valve SWV-24 to be sealed and throttled two and 1/8 turns open for normal plant operations.

Enclosure 1

9705080198 970421
PDR ADOCK 05000302
Q PDR

Contrary to the above, in the following seven examples, the licensee failed to accomplish activities affecting quality in accordance with procedures to control equipment for normal operating conditions:

1. On January 24, 1997, Nuclear Services Cooling System Vent Valve RWV-73 was opened and left open by an operator verifying an idle Decay Heat system heat exchanger was filled per Surveillance Procedure (SP) 306, Weekly Surveillance Log, Revision 13. It was not discovered until a pump start approximately five hours later resulted in water flowing from the valve.

2. On January 26, 1997, nitrogen system pressure instrument isolation valve NGV-313 was found incorrectly in the closed position, isolating the downstream gage.

3. On January 24, 1997, air isolation to the Makeup System Valve MUV-243, Prefilter 2A Outlet, was found incorrectly in the closed position. The valve was closed without any procedural controls or documentation to isolate an air leak.

4. On January 28, 1997, station air header drain Station Air Valve SAV-49 was found incorrectly in the closed position. The valve was closed without procedural controls or documentation to isolate a leaking downstream solenoid valve.

5. On March 7, 1997, oily water separator tank Vent Valves SDV-107, 108 and 109 were found in the open position. The valves had been opened and left open to allow the use of an alternate vent path not delineated by OP-422, Section 4.2.

6. On March 21, 1997, fire damper (FD) power links for FD-47 and FD-83 were found open during surveillance testing after the dampers failed to actuate.

7. On March 28, 1997, Nuclear Services Closed Cycle Cooling Valve SWV-24 was found in a throttled position less than two and 1/8 turns open. A plant operator then removed a valve position seal and throttled SWV-24 open to increase flow to 600 gpm to the in service spent fuel pool (SFP) cooler B. The operator did not verify SWV-24 was throttled open two and 1/8 turns and subsequent verification revealed it was not. Valve SWV-23 was also found in a throttled position less than the required two turns open.

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

B. Crystal River Technical Specifications (TS) 5.6.1.1, Procedures, requires written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide (RG) 1.33, Quality Assurance Program Requirements (Operational).

Revision 2, dated February 1978. Appendix A requires procedures for fire in the control room or forced evacuation of the control room.

Final Safety Analysis Report (FSAR) Section 7.4.6.5 states in part that the design basis for the remote shutdown system is 10 CFR 50, Appendix R, Section L, and 10 CFR 50, Appendix A, Criterion 19. FSAR Section 7.4.6.5 further states that the design basis for remote shutdown assumes a loss of offsite power. FSAR Section 9.8.6 states that plant procedures developed in accordance with 10 CFR 50, Appendix R, Sections III.G and III.L establish means to bring the plant from operating to cold shutdown.

Section III.L of Appendix R of 10 CFR 50, states, in part, that procedures shall be in effect to implement the capability of being able to take the plant to cold shutdown within 72 hours following main control room evacuation due to a fire.

Contrary to the above, as of March 21, 1997, adequate procedures were not in effect to meet the requirements of 10 CFR 50, Appendix R, Section III.L, in that Abnormal Procedure AP-990, Shutdown From Outside Control Room, Revision 8, and Operating Procedure OP-209, Plant Cooldown, Revision 87, (used either separately or in conjunction with each other) did not provide adequate instructions for taking the plant from hot standby to cold shutdown following main control room evacuation due to a fire. These procedures contained steps to take the plant to hot standby and then directed operations personnel to maintain the plant in hot standby until a specific cooldown plan and procedure were developed.

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

C. Technical Specifications surveillance requirement (SR) SR 3.3.5.2 for Engineered Safeguards Actuation System (ESAS) instrumentation requires that a channel functional test of ESAS be performed once every 31 days.

Technical Specifications SR 3.3.5.3 for Engineered Safeguards Actuation System instrumentation requires that a channel calibration be performed once every 24 months.

Technical Specifications SR 3.8.1.10 Electrical Power Systems, AC Sources - Operating requires that a test of load shedding from emergency buses on an actual or simulated loss of offsite power signal in conjunction with an actual or simulated Engineered Safeguards (ES) actuation signal be performed once every 24 months.

a. Contrary to the above, prior to April 12, 1996, the licensee did not perform the channel functional test of the auto reset function for ES blocks 4 and 6 load sequencing relays.

b. Contrary to the above, prior to October 22, 1996, the licensee did not perform the channel calibration and channel functional test for two contacts in each of the three ESAS Low Pressure bistables and for two contacts in each of the three ESAS Low Low Pressure bistables in the ESAS Reactor Coolant System Pressure - Low and Low Low actuation circuits.

c. Contrary to the above, prior to April 12, 1996, the licensee did not perform testing for load shedding of EFP-1 when EGDG-1A is supplying the ES bus and ES actuation signal is present.

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 Crystal River Unit 3 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 21st day of April 1997