

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION II

SAM NUNN ATLANTA FEDERAL CENTER 61 FORSYTH STREET SW SUITE 23T85 ATLANTA, GEORGIA 30303-8931

July 24, 2002

Mr. Dale E. Young, Vice President Crystal River Nuclear Plant (NA1B) ATTN: Supervisor, Licensing & Regulatory Programs 15760 West Power Line Street Crystal River, FL 34428-6708

SUBJECT: CRYSTAL RIVER UNIT 3 - NRC INTEGRATED INSPECTION REPORT

50-302/02-02

Dear Mr. Young:

On June 29, 2002, the NRC completed an inspection at your Crystal River Unit 3. The enclosed report documents the inspection findings which were discussed on July 12, 2002, with you and members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

No findings of significance were identified by the NRC inspectors.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

//RA by Son Ninh for//

Leonard D. Wert, Chief Reactor Projects Branch 3 Division of Reactor Projects

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

Enclosure: Inspection Report 50-302/02-02

cc w/encl: (See Page 2)

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E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No.: 50-302

License No.: DPR-72

Report No.: 50-302/02-02

Licensee: Florida Power Corporation (FPC)

Facility: Crystal River Unit 3

Location: 15760 West Power Line Street

Crystal River, FL 34428-6708

Dates: March 31 to June 29, 2002

Inspectors: S. Stewart, Senior Resident Inspector

S. Sanchez, Resident Inspector

W. Sartor, Senior Emergency Preparedness Inspector

(Sections 1EP1, 1EP4, 4OA1.2)

Accompanying

Personnel: L. Mellen, Senior Operations Engineer

Approved by: Leonard Wert, Chief

Reactor Projects Branch 3 Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000302-02-02, on 03/31/2002 - 06/29/2002, Florida Power Corporation, Crystal River Unit 3. Resident Integrated Inspection Report.

The inspection was conducted by the resident inspectors and two regional emergency preparedness inspectors. No findings of significance were identified. The significance of issues is indicated by their color (Green, White, Yellow, Red) and was determined by the Significance Determination Process in the NRC Inspection Manual Chapter 0609. Findings to which the SDP does not apply are indicated by "No Color" or by the severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process web site. http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/index.htm.

A. <u>Inspector Identified Findings</u>

None

B. <u>Licensee Identified Violations</u>

Violations of very low safety significance which were identified by the licensee have been reviewed by the inspectors. Corrective actions taken or planned by the licensee appeared reasonable. These violations are listed in Section 4OA7 of this report.

Report Details

Summary of Plant Status

Crystal River 3 operated at or near 100% rated thermal power except for a planned shutdown to Mode 3 that occurred from May 17 to May 19, 2002. During this shutdown, a small oil leak on the 1A reactor coolant pump motor was repaired.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity [Reactor-R]

1R01 Adverse Weather Protection

a. <u>Inspection Scope</u>

The inspectors reviewed licensee procedure EM-220, Violent Weather, to check that measures were available to protect vital systems and components during hurricane season. The emergency feedwater pump (EFP-3) building and the emergency diesel generator rooms were walked down to check that flood and violent weather mitigation equipment was either in-place or capable of installation should violent weather be imminent. The inspectors also checked that there were no impediments to the ultimate heat sink remaining available during a hurricane. The inspectors checked that violent weather protection issues were being documented and addressed in the licensee corrective action program.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignment

a. <u>Inspection Scope</u>

The inspectors checked the alignment of risk important systems to evaluate the readiness of the redundant trains or backup systems while one train was out of service for maintenance. These quarterly walkdowns included switch and valve position checks looking for discrepancies with the alignment specified in operating procedures, and verification of electrical power to critical components. The inspectors reviewed sections of the plant operating instructions as applicable to each walkdown. Nuclear condition reports were reviewed to verify that the licensee was identifying and correcting component alignment issues. The specific systems walked down were:

- Train A control complex chiller using operations procedure OP-409, Plant Ventilation System, when the train B chiller was out of service due to its not having reloaded as temperatures increased (Nuclear Condition Report 62993)
- Emergency feedwater pump number 2 (EFP-2) using operations procedure OP-450, Emergency Feedwater System, when emergency feedwater pump number

3 (EFP-3) was out of service for repair of its lube oil soakback pump, DLP-13, (Work Order 234560)

- Emergency diesel generator EGDG-1A using operations procedure OP-707, Operation of the Engineered Safeguards Emergency Diesel Generators, while EGDG-1B was out of service for repair of the cooling fan gear drive casing (Work Order 236227)
- Emergency diesel generator EGDG-1B using operations procedure OP-707,
 Operation of the Engineered Safeguards Emergency Diesel Generators, while EGDG-1A was out of service for surveillance testing (twice)
- Nuclear services and decay heat sea water pumps RWP-2A and RWP-3A using operations procedure OP-408, Nuclear Services Cooling, when RWP-2B and RWP-3B were out of service during clearance (tagging) activities

b. Findings

No findings of significance were identified.

1R05 Fire Protection

a. <u>Inspection Scope</u>

The inspectors walked down risk significant plant areas to check that controls of transient combustibles and ignition sources were consistent with the licensee's Fire Protection Plan and 10 CFR Part 50, Appendix R. The inspectors also evaluated the material condition, operational lineup, and operational effectiveness of fire protection systems and assessed operational status and material condition of fire barriers used to contain fire damage. The inspections were completed using the standards of the Fire Protection Plan, 10 CFR Part 50, Appendix R, the Florida Power Corporation Analysis of Safe Shutdown Equipment, and the Final Safety Analysis Report. The inspectors reviewed sections of Administrative Instruction AI-2200, Guidelines for Handling, Use, and Control of Transient Combustibles, SP-190D, Functional Testing of Fire Detection Systems - Control Complex, SP-607, Fire Dampers Inspection, and checked performance of SP-800, Monthly Fire Extinguisher Inspection to verify the operational condition of fire protection equipment. The components and areas receiving specific fire protection walkdowns were:

- 480 Volt Switchgear Rooms
- Main Control Room
- 1E Battery Rooms
- 1E Battery Charger Rooms
- Cable Spreading Room
- Lower Elevations of the Reactor Building

b. Findings

1R07 Heat Sink Performance

a. Inspection Scope

The inspectors reviewed licensee Operating Procedure OP-103B, Operating Curves, Curve 15, Service Water System Heat Transfer Capability, and Florida Power Corporation Calculation M97-0133, Service Water Heat Loads Following Large Break Loss of Coolant Accident, to check that the acceptance criteria specified in the operations curve appropriately considered differences between design conditions and testing conditions.

The inspectors checked the licensee's heat exchanger maintenance and monitoring program using 10 CFR Part 50, Appendix A Criteria 44, 45, 46; Technical Specifications; Updated Final Safety Analysis Report Section 9.5; and applicable parts of NRC Generic Letter 89-13, Service Water System Problems Affecting Safety Related Equipment. The inspectors observed the licensee's inspection and cleaning of the seawater side of the 1B service water heat exchanger on June 3, 2002. The inspectors discussed with the responsible maintenance and operations personnel service water system monitoring and observed routine heat exchanger inspections.

The inspectors checked that the licensee periodically opened one heat exchanger for evaluation and when the acceptance criterion for blockage was exceeded, the occurrence was documented in the licensee's corrective action program. In these cases, the inspectors checked that a second heat exchanger was opened for inspection as specified in licensee procedure OP-103B. The inspectors checked that the tube plugging for the four service water heat exchangers was consistent with the licensee's design basis for heat removal capability and that plugged tubes were assessed in the licensee's monitoring of flow blockage.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification

a. <u>Inspection Scope</u>

The resident inspectors observed a requalification examination simulator session to check that operator performance was consistent with 10 CFR 55 requirements and industry guidelines. The inspectors checked that licensee evaluators properly implemented 10 CFR 55.59 requirements. During the observed session, the inspectors checked the crew's abilities in making emergency classifications and notifications as part of the simulated emergency operations during performance of licensee Evaluated Simulator Exercise SES-37.

b. <u>Findings</u>

1R12 Maintenance Rule Implementation

a. Inspection Scope

The inspectors routinely checked that the licensee promptly entered problems with plant equipment into either the corrective action program or the corrective maintenance program. For the equipment issues described in the nuclear condition reports (NCR) or work orders (WO) listed below, the inspectors reviewed the licensee's implementation of the Maintenance Rule (10CFR50.65) with respect to the characterization of failures, the appropriateness of the associated a(1) or a(2) classifications, and the appropriateness of either the associated a(2) performance criteria or the associated a(1) goals and corrective actions.

- NCR 56360, Makeup pump MUP-2B not remaining stopped when selected
- NCR 55893, Oscillations on the B once-through steam generator level indicator in the B channel of the emergency feedwater initiation and control
- NCR 60478, Crack discovered on bearing cover for EDG 1B cooling fan right angle gear drive
- NCR 62372, Degraded coating on FST-1B interior weld
- WO 234560, Replace DLP-13, lube oil soakback pump for emergency feedwater pump, EFP-3
- NCR 54447, Failure of engineered safeguards actuation relay

b. <u>Findings</u>

No findings of significance were identified.

R13 Maintenance Risk Assessments and Emergent Work Evaluation

a. <u>Inspection Scope</u>

The inspectors reviewed daily maintenance schedules and observed work controls to check risk management while maintenance was conducted. The inspectors employed standards for operability of equipment such as those found in Technical Specifications, the Final Safety Analysis Report, licensee procedures, and regulatory information such as NRC Generic Letter 91-18, Revision 1, Information to Licensees Regarding NRC Inspection Manual Section on Resolution of Degraded And Nonconforming Conditions. The inspectors also reviewed maintenance schedules to check that overall risk was minimized through preservation of safety functions such as decay heat removal capability, reactor coolant system inventory control, electric power availability, reactivity control, and primary containment control. The inspectors checked if licensee personnel were managing risk by assuring that key safety functions were preserved and that upon identification of an unplanned situation, the resulting emergent work was evaluated by the licensee for risk and controlled as described in Technical Specifications, licensee Compliance Procedure CP-253, Power Operations Risk Assessment and Management, and Operations Instruction OI-7, Control of Equipment and System Status. The inspectors checked that risk significant emergent work was documented in the

corrective action program and that corrective actions were promptly initiated. Specific parts of the licensee's risk assessments and/or the unplanned maintenance conditions listed were checked:

- April 8, 2002, with emergency feedwater pump EFP-3 out of service, while RM-A-12 was out of service
- Work Week 02W18 with raw water pump RWP-1 out of service, and the spare battery chargers out of service,
- May 8, 2002, for the unscheduled removal of emergency diesel generator EGDG-1B from service,
- May 17 and 18, 2002, for plant shutdown to Mode 3 for repairs,
- Work Week 02W20 for emergency diesel EDG -1A out of service while one train of steam bypass valves were out of service
- June 17 to 19, 2002, for unscheduled repairs to the offsite power system

b. Findings

No findings of significance were identified.

1R14 Personnel Performance Related to Non-routine Plant Evolutions and Events

a. <u>Inspection Scope</u>

During the period of May 17 to 19, 2002, the inspectors observed control room activities and reviewed operating logs to check that plant operators followed operating procedures for plant shutdown to Mode 3, control of the plant during shutdown operations, plant startup and return to power operations.

On June 17, 2002, the inspectors responded to the control room during a partial loss of offsite power occurrence during severe weather. The inspectors checked that plant operators appropriately implemented operating instructions for loss of the offsite transformer and operation of emergency diesel generator EGDG-1A. Subsequently, the inspectors checked if operators safely completed rack-out of two 4160 volt vital bus breakers to isolate the offsite power transformer and place the redundant vital bus on an alternate power supply. On June 19, the inspectors observed the operators recover the offsite power transformer. In both cases, the inspectors checked if the evolutions were performed in accordance with applicable operating instructions and guidelines. The inspectors routinely checked if problems in personnel performance were being documented in the licensee's corrective action program. The inspectors checked if significant problems were evaluated for root cause and if corrective actions were implemented.

b. Findings

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed degraded or non-conforming conditions such as those listed in nuclear condition reports (NCRs), work schedules, or engineering documents to check if operability was consistent with Technical Specifications, the Final Safety Analysis Report, 10CFR Part 50 requirements, and when applicable, NRC Generic Letter 91-18, Revision 1, Information to Licensees Regarding NRC Inspection Manual Section on Resolution of Degraded And Nonconforming Conditions. The inspectors monitored licensee activities to check if operability issues were being identified at an appropriate threshold and documented in the corrective action program, consistent with 10 CFR 50, Appendix B requirements, and licensee procedure NGGC-200, Corrective Action Program. The inspectors checked that when plant problems were identified, the resulting change in plant risk was identified and managed. The following issues including nuclear condition reports (NCRs) were specifically checked:

- NCR 60982 written when foreign material was found in the reactor building during a walkdown,
- NCR 56130, documenting emergency feedwater pump EFP-2 governor high oil level.
- NCR 59471 documenting a loose bolt on the flange downstream of raw water pump RWSP-1B and raw water system valve RWV-168,
- Engineering Change 49604R0, written to evaluate megger readings of medium voltage cables from the offsite power transformer

b. Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing

a. Inspection Scope

The inspectors evaluated the following post-maintenance testing activities for risk significant systems to check the following (as applicable): (1) the effect of testing on the plant had been adequately addressed; (2) testing was adequate for the maintenance performed; (3) acceptance criteria were clear and demonstrated operational readiness; (4) test instrumentation was appropriate; (5) tests were performed as written; and (6) equipment was returned to its operational status following testing. The inspectors evaluated the licensee activities against the Technical Specifications, the Final Safety Analysis Report, 10 CFR Part 50 requirements, licensee procedures, and various NRC generic communications. The inspectors routinely checked that post maintenance testing issues were documented in the licensee's corrective action program and corrected.

The specific post-maintenance activities evaluated included:

SP-353, Control Room Emergency Ventilation System and RM-A5 Monthly Test, after air handling fan AHF-B annual inspection per work order 240273

- SP-344A, RWP-2A, SWP-1A and Valve Surveillance, after service water pump SWP-1A motor cooler replacement per work order 216397
- SP-108, Reactor Trip Module and Control Rod Drive Trip Functional Test, after control rod drive breaker replacement per work order 237155
- SP-354B, Monthly Functional Test of Emergency Diesel Generator EGDG-1B, after right angle gear box replacement per work order 236227
- SP-354A, Monthly Functional Test of Emergency Diesel Generator EGDG-1A, after right angle gear box replacement per work order 264167
- SP-349B Emergency Feedwater Pump EFP-2 and Valve Surveillance, following preventive maintenance on main steam valve MSV-55 per work order 222076

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing

a. <u>Inspection Scope</u>

The inspectors observed surveillance testing (SPs) or reviewed test data for risk-significant systems or components, to check compliance with Technical Specifications, 10 CFR Part 50, Appendix B, and licensee procedure requirements. The testing was also checked for consistency with the Final Safety Analysis Report, NRC Generic Letter 89-04, Guidance on Developing Acceptable Inservice Testing Programs, and NUREG-1482, Guidelines for Inservice Testing at Nuclear Power Plants. The inspectors checked if the testing demonstrated that the systems were ready to perform their intended safety functions. During the inspections, consistent with 10 CFR Part 50, Appendix B, Criterion XVI, and licensee procedure CAP-NGGC-200, Corrective Action Program, the inspectors verified that licensee personnel were documenting surveillance problems in the corrective action program.

Inservice test (IST) activities were checked to ensure testing methods, acceptance criteria, and required corrective actions were in accordance with the ASME Code, Section XI, and Florida Power Corporation ASME Section XI, Ten Year Inservice Testing Program, dated May 4, 1998.

The specific surveillance activities assessed included:

- SP-354A, Monthly Functional Test of Emergency Diesel Generator EGDG-1A (two occurrences)
- SP-349B, Emergency Feedwater Pump EFP-2 and valve test
- SP-349C, Emergency Feedwater Pump EFP-3 and Valve Surveillance
- SP-340B, Decay Heat Removal Pump DHP-1A, Building Spray Pump BSP-1A, and Valve Surveillance (IST)
- SP-521 Quarterly Battery Check for Battery A1

b. Findings

Cornerstone: Emergency Preparedness [EP]

1EP1 Exercise Evaluation

a. Inspection Scope

Prior to the scheduled May 29 - 30, 2002 emergency exercise, the inspectors reviewed the objectives and scenario to determine whether they were designed to test major elements of the licensee's Radiological Emergency Plan (REP). The inspectors observed and evaluated the licensee's performance in the exercise including those in the emergency offsite facility for the ingestion pathway exercise portion. Licensee activities inspected during the exercise included those occurring in the Control Room Simulator, Technical Support Center, Operational Support Center, and Emergency Operations Facility. The NRC's assessment focused on the risk-significant activities of event classification, notification of governmental authorities, onsite protective actions, offsite protective action recommendations, and accident mitigation. The inspectors also evaluated command and control, the transfer of emergency responsibilities between facilities, communications, and adherence to emergency plan implementing procedures. The performance of the emergency response organization was evaluated against applicable licensee procedures and regulatory requirements. The inspectors attended the post-exercise critique to check the licensee's self-assessment process, as well as the presentation of critique results to plant management. The inspectors verified that significant issues identified in the exercise and critiques were entered into the licensee's corrective action program.

b. Findings

No findings of significance were identified.

1EP4 Emergency Action Level (EAL) and Emergency Plan Changes

a. Inspection Scope

The inspector reviewed changes to the Radiological Emergency Plan (REP), as contained in Revision 22, against the requirements of 10 CFR 50.54(q) to determine whether any of the changes decreased REP effectiveness.

b. Findings

No findings of significance were identified.

1EP6 Drill Evaluation

a. Inspection Scope

The inspectors observed conduct of a April 3, 2002 licensed operator evaluated session in the plant specific simulator. The inspectors assessed whether the crew correctly classified the simulated events and made simulated notifications of an alert, then site area emergency following a simulated tornado strike and subsequent large break loss of coolant accident specified by the pre-scripted scenario. The classifications and

notifications were checked using the Crystal River Radiological Emergency Response Plan, Section 8.0, Emergency Classification System, and 10 CFR Part 50.72 and 10 CFR Part 50, Appendix E. The need for protective action recommendations was checked using licensee emergency response procedures. The inspectors attended the post-scenario critique to check that the licensee evaluated the crew in accordance with plant procedures including the Radiological Emergency Response Plan. The inspectors also assessed whether conduct of emergency operations and crew communications were in accordance with licensee procedures.

b. <u>Findings</u>

No findings of significance were identified.

4. OTHER ACTIVITIES (OA)

4OA1 Performance Indicator (PI) Verification

.1 Initiating Event and Mitigating System Cornerstone

a. Inspection Scope

The inspectors checked the accuracy of the performance indicators for emergency AC and initiating events. Performance indicator data submitted in April 2002, were compared for consistency to data obtained through the review of control room logs, monthly operating reports, and equipment out-of-service records from July 2001 through March 2002. The inspector checked that there were no initiating event occurrences during the review period. During routine plant tours, the inspectors checked for proper controls for plant personnel exposure and radioactive releases.

a. Findings

No findings of significance were identified.

.2 Emergency Preparedness Cornerstone

a. Inspection Scope

On May 28-30, 2002, licensee records were reviewed to determine whether the submitted PI statistics (through the first quarter of 2002) were calculated in accordance with the guidance contained in Section 2.4 (Emergency Preparedness Cornerstone) of NEI 99-02, Revision 1, "Regulatory Assessment Performance Indicator (PI) Guideline." The inspector assessed the accuracy of the PI for Emergency Response Organization (ERO) drill and exercise performance (DEP) through review of a sample of drill records. Documentation was reviewed for ERO drills conducted and control room simulator evaluations conducted during the last four quarters to verify the licensee's reported data regarding successes in emergency classifications, notifications, and protective action recommendations. The inspector assessed the accuracy of the PI for ERO drill participation during the previous 8 quarters through review of the training records for 15 of the 89 individuals assigned to key positions in the ERO as of the end of the first quarter of 2002. The inspector assessed the accuracy of the PI for the alert and

notification system reliability through review of a sample of the licensee's records of the weekly full cycle tests, and the growl tests conducted for the past 4 quarters. The following PIs were reviewed:

- ERO Drill/Exercise Performance
- ERO Drill Participation
- Alert and Notification System Reliability

b. Findings

No findings of significance were identified.

4OA2 Problem Identification and Resolution

a. <u>Inspection Scope</u>

The inspectors routinely checked that equipment, human performance, and program problems were being entered into the licensee corrective action program and that corrective actions were implemented in accordance with licensee procedure CAP-NGGC-0200, Corrective Action Program and 10 CFR Part 50, Appendix B. In particular, the inspectors checked that nuclear condition report NCR 51574 was written after unexpected rod movement was observed during reactor coolant system delithiation on November 18, 2001. After allowing time for resolution of the occurrence, the inspectors checked that the occurrence was accurately identified in the corrective action program and was evaluated to the extent that root and contributing causes were identified. The inspectors checked that corrective actions were taken that corrected the identified causes. The inspectors checked that the specified corrective actions had been implemented and verified that the occurrence had been reviewed by the plant management as specified by licensee procedures.

b. <u>Findings</u>

No findings of significance were identified.

4OA3 Event Followup

(Closed) Licensee Event Report 50-302/00-003-00: Reactor Coolant Pump Trip Criteria May Cause Peak Fuel Clad Temperature to Exceed 10 CFR 50.46 Acceptance Criteria. This licensee event report (LER) reported a condition identified as potentially outside the design basis of the plant related to a core flood tank line break loss of coolant accident (LOCA) with offsite power available. The revised analysis shows that the event can be mitigated by tripping the reactor coolant pumps within one minute, vice the previously specified two minutes. The inspectors verified that operators were trained to trip the reactor coolant pumps immediately when subcooling margin was lost and that the licensee has normally assessed this action in simulator training sessions. The inspectors reviewed the LER and no findings of significance were identified. No violations of NRC requirements were identified. The LER is closed.

.2 (Closed) Licensee Event Report 50-302/01-005-00: Loss of Steam to the Operating Main Feedwater Pump Results in Actuation of the Emergency Feedwater System. The inspectors observed this event from the control room and reviewed the LER. No findings of significance were identified. No performance deficiencies were identified. The LER is closed.

4OA6 Meetings

Exit Meeting Summary

The resident inspectors presented the inspection results to Mr. D. Young and other members of licensee management at the conclusion of the inspection on July 12, 2002. The inspectors asked the licensee whether any of the material examined during the inspection should be considered proprietary. The licensee did not identify any proprietary information.

4OA7 Licensee Identified Violations

The following findings of very low significance were identified by the licensee and are violations of NRC requirements which meet the criteria of Section VI of the NRC Enforcement Policy, NUREG-1600 for being dispositioned as NCVs.

If you deny any of the non-cited violations, you should provide a response with the basis for your denial, within 30 days of the date of this inspection report to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to the Regional Administrator, Region II; the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Crystal River 3 facility.

NCV Tracking Number

Requirement Licensee Failed To Meet

NCV 50-302/02-02-01

Technical Specification 5.6.1, Procedures, states that written procedures shall be implemented covering the activities recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. The regulatory guide list in Appendix A, includes procedures for equipment control (tagging). Licensee procedure OPS-NGGC-1301, Equipment Clearance implements this requirement and states, in step 4.10, that the "Tag Hanger positions components as specified on the Clearance Checklist." Contrary to the above, the tag hanger for Clearance Checklist 35216, on April 4, 2002, failed to position the emergency feedwater pump (EFP-3) fuel rack, in the "tripped" position prior to placing a "Diesel Engine Tripped" tag on the fuel rack. The rack was in the Normal, not tripped position and this was not identified by the independent second-checker. This is being treated as a Non-Cited Violation. The violation is in the licensee corrective action program as Nuclear Condition Report 58819 (Green).

NCV 50-302/02-02-02

10 CFR 50.65 (a)(4) requires, in part, that before performing maintenance activities (including but not limited to surveillances, post-maintenance testing, and corrective and preventive maintenance), the licensee shall assess and manage the increase in risk that may result from the proposed maintenance activities. Contrary to the above, the licensee failed to assess the maintenance risk for all plant maintenance to be performed during the week of February 11, 2002. Specifically, the completed assessment failed to account for raw water pumps within licensee-established risk assessment scope that were concurrently out of service. This is being treated as a Non-Cited Violation. The violation is in the licensee corrective action program as Nuclear Condition Report 58911 (Green).

PARTIAL LIST OF PERSONS CONTACTED

Florida Power Company

- M. Annacone, Manager, Operations
- S. Bernhoft, Manager, Regulatory Affairs
- W. Brewer, Manager, Outages and Scheduling
- R. Davis, Manager, Training
- J. Franke, Plant General Manager
- C. Gurganus, Manager, Maintenance
- D. Roderick, Director Site Operations
- S. Johnson, Supervisor, Self-Evaluation
- M. Folding, Superintendent, Security
- S. Powell, Supervisor, Licensing
- J. Stephenson, Supervisor, Emergency Preparedness
- J. Terry, Manager, Engineering
- R. Warden, Manager, Nuclear Assessment
- D. Young, Vice President, Crystal River Nuclear Plant

NRC

- V. McCree, Deputy Director, Division of Reactor Projects, NRC Region II
- L. Wert, Chief, Reactor Projects Branch 3, NRC Region II
- S. Rudisail, Project Engineer, Division of Reactor Projects, NRC Region II
- R. Beall. NRC Headquarters
- T. Johnson, Senior Resident Inspector, Farley Nuclear Power Plant
- J. Hufham, Senior Emergency Preparedness Engineer, NRC Region II
- J. Jimenez, NRC Intern

ITEMS OPENED AND CLOSED

50-302/02-02-01	NCV	Failure to properly position a component during clearance (tagging) activities (Section 4OA7)					
50-302/02-02-02	NCV	Failure to complete an accurate risk assessment per 10 CFR 50.65(a)(4) (Section 4OA7)					
ITEMS CLOSED							
50-302/00-003-00	LER	Reactor Coolant Pump Trip Criteria May Cause Peak Fuel Clad Temperature to Exceed 10 CFR 50.46 Acceptance Criteria (Section 4OA3.1)					
50-302/01-005-00	LER	Loss of Steam to the Operating Main Feedwater Pump Results in Actuation of the Emergency Feedwater System (Section 4OA3.2)					