



Crystal River Nuclear Plant
Docket No. 50-302
Operating License No. DPR-72

Ref: 10CFR50.65

February 5, 2002
3F0202-03

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

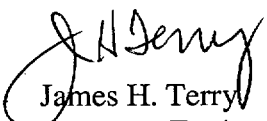
Subject: Crystal River Unit 3 – Submittal of a Maintenance Rule Frequently Asked Question (FAQ)

Dear Sir:

The purpose of this letter is to request that the attached Frequently Asked Question (FAQ) be forwarded to Mr. Steve Alexander of the NRC Maintenance Rule Branch for consideration. This method of submitting a Maintenance Rule FAQ for consideration is being used since the normal method of electronically submitting the FAQ via the NRC Website is not currently available.

If you have any questions regarding this submittal, please contact Mr. Sid Powell, Supervisor, Licensing and Regulatory Programs at (352) 563-4883.

Sincerely,


James H. Terry
Manager, Engineering

JHT/dwh

Attachment: Maintenance Rule Frequently Asked Question (FAQ)

xc: NRR Project Manager
Regional Administrator, Region II
Senior Resident Inspector
Steve Alexander

A001

MAINTENANCE RULE FREQUENTLY ASKED QUESTION (FAQ)

Maintenance Rule FAQ Request:
<p>NRC Reactor Oversight Process (ROP) Performance Indicator (PI) FAQ # 292 allows exempting the monitoring of unavailability for Safety System Unavailability PIs if the event causes a train to be unavailable for less than fifteen minutes. This FAQ was submitted by NEI's Safety Performance Assessment Task Force and approved by the NRC on December 13, 2001. Mr. Steve Alexander of the NRC Maintenance Rule Branch has been involved in several of these meetings held with the goal of having consistent guidelines for tracking unavailability.</p> <p>The technical justification for the approval of this exemption included analysis by the Operating Experience Risk Analysis Branch of the NRC which concluded that a difference of three hours of unavailability in a quarter was statistically insignificant.</p> <p>Florida Power Corporation's (FPC) Crystal River Unit 3 (CR-3) desires to use the same exemption for monitoring unavailability for Maintenance Rule purposes.</p>
Recommended Response:
<p>For Maintenance Rule unavailability monitoring, licensees should not report any scheduled unavailability events that result in less than 15 minutes of train unavailability. The intent is to minimize unnecessary burden of data collection, documentation, and verification. Licensees should compile a list of surveillances/evolutions that meet this criterion and have it available for inspector review. This is consistent with approved NRC ROP PI FAQ #292.</p>

Contacts:

Kenneth Heffner, Progress Energy Project Licensing Engineer, (919) 546-5688
Mark Satorius, NRR
John Thompson, NRR
Don Hickman, NRR