

September 8, 2003

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

SUBJECT: CRYSTAL RIVER UNIT 3 - ISSUANCE OF AMENDMENT REGARDING
TECHNICAL SPECIFICATION CHANGE REQUEST FOR CONTAINMENT
ISOLATION VALVES (TAC MB7988)

Dear Mr. Young:

The Commission has issued the enclosed Amendment No. 209 to Facility Operating License No. DPR-72 for Crystal River Unit 3 (CR-3). The amendment consists of changes to the existing Technical Specifications in response to your letter dated February 17, 2003.

The amendment would revise Improved Technical Specification (ITS) 3.6.3, "Containment Isolation Valves," to allow verification by administrative means of isolation devices in high radiation areas, and isolation devices that are locked, sealed, or otherwise secured. The specific Conditions and Surveillance Requirements (SRs) in ITS 3.6.3 affected are: (1) Condition A - Required Action A.2, (2) Condition B - Required Actions B.1 and B.2, (3) Condition C - Required Action C.2, and (4) SR 3.6.3.3 and SR 3.6.3.4. The changes are consistent with NUREG-1430, "Standard Technical Specifications: Babcock and Wilcox Plants," Revision 2, and Technical Specification Task Force (TSTF) Traveler TSTF-440. Associated changes were submitted for the ITS Bases.

A copy of the Safety Evaluation is enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Brenda L. Mozafari, Senior Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-302

Enclosures:

1. Amendment No. 209 to DPR-72
2. Safety Evaluation

cc w/enclosures: See next page

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cc w/enclosures: See next page
Adams: ML032521440

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FLORIDA POWER CORPORATION

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SEMINOLE ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-302

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 209
License No. DPR-72

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Florida Power Corporation, et al. (the licensees), dated February 17, 2003, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

- E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-72 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 209, are hereby incorporated in the license. Florida Power Corporation shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Allen G. Howe, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical Specifications

Date of Issuance: September 8, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 209

FACILITY OPERATING LICENSE NO. DPR-72

DOCKET NO. 50-302

Replace the following pages of the Appendix "A" Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

Remove

3.6-9
3.6-10
3.6-11
3.6-12
3.6-13
B 3.6-21
B 3.6-22
B 3.6-23
B 3.6-25
B 3.6-26

Insert

3.6-9
3.6-10
3.6-11
3.6-12
3.6-13
B 3.6-21
B 3.6-22
B 3.6-23
B 3.6-25
B 3.6-26

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 209 TO FACILITY OPERATING LICENSE NO. DPR-72
FLORIDA POWER CORPORATION, ET AL.
CRYSTAL RIVER UNIT NO. 3 NUCLEAR GENERATING PLANT
DOCKET NO. 50-302

1.0 INTRODUCTION

By letter dated February 17, 2003, Florida Power Corporation (the licensee, doing business as Progress Energy Florida, Inc.) proposed changes to the Crystal River Nuclear Plant Unit 3 (CR-3) Technical Specifications (TS). The requested changes would make an editorial change to the Note associated with Improved Technical Specification (ITS) 3.6.3 Required Actions A.2, B.2, and C.2; add a new Note to ITS 3.6.3 Required Actions A.2, B.2, and C.2 to allow locked, sealed, or otherwise secured isolation devices to be verified by administrative means; modify Surveillance Requirements (SRs) 3.6.3.3 and 3.6.3.4 to exclude locked, sealed, or otherwise secured manual containment isolation valves and blind flanges from being verified closed; and revise the Bases for ITS 3.6.3 to reflect these changes as well as to eliminate the requirement to perform a system walkdown in the Bases discussion of ITS 3.6.3 Required Actions A.1 and A.2, and SR 3.6.3.3. The proposed TS are consistent with the Standard Technical Specifications (STS) for Babcock and Wilcox Plants (NUREG-1430, Revision 2) as modified by Technical Specification Task Force (TSTF) Travelers 45, 269, and 440.

2.0 REGULATORY EVALUATION

The CR-3 licensee has implemented NUREG-1430, Revision 0, "Standard Technical Specifications - Babcock and Wilcox Plants." NUREG-1430, Revision 1, as modified by TSTF-45 and TSTF-269, provides some relaxation for valve position verification in various Action Statements and SRs in STS 3.6.3, "Containment Isolation Valve (CIV)." These changes were incorporated in Revision 2 of NUREG-1430 dated April 2001. TSTF-440 modifies the Bases of STS 3.6.3 of NUREG-1430, Revision 2, to allow means other than a system walkdown to verify CIV position. The licensee proposed to update its TS to incorporate these revisions.

The regulatory requirements for which the NRC staff based its acceptance criteria are:

- TSTF-45, Revision 2, approved by the NRC on July 26, 1999; TSTF-269, Revision 2, approved by the NRC on July 26, 1999; and TSTF-440 approved by the NRC on October 11, 2002.
- The model TS contained in the STS, NUREG-1430, Revision 2, "Standard Technical Specifications, Babcock and Wilcox Plants," dated October 10, 2001.

3.0 TECHNICAL EVALUATION

The NRC staff has reviewed the licensee's regulatory and technical analyses in support of its proposed license amendment, which are described in the licensee's application.

The proposed changes to ITS 3.6.3 and its associated Bases are:

- A. The words "Valves and blind flanges" in the Note modifying Required Actions A.2, B.2, and C.2 will be replaced with the words "Isolation devices." In addition, the Note will be labeled "1." The associated Bases are revised accordingly.
- B. A new Note 2 will be added to the Notes modifying Required Actions A.2, B.2, and C.2. The note will state that "Isolation devices" that are locked, sealed, or otherwise secured may be verified by administrative means. The associated Bases are revised accordingly.
- C. Required Action B.1 is being revised to correct a typographical error. "De-activated" becomes "De-activated."
- D. SR 3.6.3.3 and SR 3.6.3.4 are modified by the addition of the words "and is not locked, sealed, or otherwise secured" between the words "containment" and "and." The associated Bases are revised accordingly.
- E. The Bases discussions for Required Actions A.1 and A.2 and SR 3.6.3.3 are modified by the deletion of the words "through a system walkdown."

The replacing of words "Valves and blind flanges" with the alternative words "Isolation devices" is an editorial change that does not change the intent or meaning of the Note modifying Required Actions A.2, B.2, and C.2. Likewise, the relabeling of this Note as Note 1 and the typographical correction to Required Action B.1 are editorial administrative-type changes. These changes are acceptable.

The addition of Note 2 to Required Actions A.2, B.2, and C.2 applies only to those isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable since the function of locking, sealing, or securing components is to ensure that these devices are not inadvertently repositioned.

Adding the words "and is not locked, sealed, or otherwise secured" to SRs 3.6.3.3 and 3.6.3.4 excludes those valves that are locked, sealed, or otherwise secured in the closed position from the verification requirements of these SRs. This is acceptable since these valves were verified to be in the correct position upon locking, sealing, or securing.

In addition, the licensee has stated in Attachment A of the submittal that other procedures and controls currently in place at CR-3 will continue to provide assurance that normally closed manual containment isolation devices that are locked, sealed, or otherwise secured are maintained in their correct positions. These surveillance procedures (SPs) and controls are as follows:

- The valves removed from SP-324, "Containment Inspection," and SP-341, "Monthly Containment Isolation Valve Operability Check," used to implement the requirements of SR 3.6.3.4 and SR 3.6.3.3 respectively will continue to be periodically surveilled in accordance with SP-381, "Locked/Sealed Valve Check List (Position Verification of Locked/Sealed Valves)."
- Initial valve lineups performed using plant operating procedures for system/plant startup following outages/maintenance activities provide an additional method of position verification.
- The physical restraint (lock or seal) placed on these devices minimizes the possibility of inadvertent repositioning. This possibility is further reduced for devices inside containment due to their inaccessibility during normal operations.
- Repositioning of many of these normally closed blind flanges and valves would result in associated system inventory decreases or increases in various sump levels. These level changes would provide the operations staff with indication of a potentially mispositioned isolation device.
- If a device has been repositioned as the result of a clearance, restoration of the device to its correct position/status is performed in accordance with OPS-NGGC-1301, "Equipment Clearance." This procedure requires independent or concurrent verification that the device is restored to its correct position when the clearance is removed. Guidance regarding verification and locked/sealed devices is also contained in Operations Instruction (OI)-10, "Verification of Activities/Questioning Attitude."
- CP-123, "Restrained Components and Key Control" provides administrative guidance related to restrained (locked or sealed) components, including restraint criteria, key control, and acceptable methods of position verification. Additional guidance related to locked/sealed valves, as well as general guidance on control of equipment, is provided in OI-07, "Control of Equipment and System Status."

The change also revises the Bases of TS 3.6.3 to permit other means in addition to system walkdowns to verify valve position results in improving the flexibility in the performance valve position verifications. While a system walkdown may still be used to meet the required verification that valves are in the correct position, other methods such as the use of remote valve position indication still meet the intent of the ITS without increased personnel dose exposure. In addition, the locking and sealing devices provide added assurance that the possibility of inadvertent repositioning is minimized. The NRC staff concludes that the proposal to permit additional means for verifying valve position is acceptable because of the improvement in operational flexibility and the potential reduction in personnel exposure.

4.0 STATE CONSULTATION

Based upon a letter dated March 8, 1991, from Ms. Mary E. Clark of the State of Florida, Department of Health and Rehabilitative Services, to Ms. Deborah A. Miller, Licensing Assistant, U.S. Nuclear Regulatory Commission, the State of Florida does not desire notification of issuance of license amendments. In a letter dated May 2, 2003, the State official requested that this longstanding practice should be maintained.

5.0 ENVIRONMENTAL CONSIDERATIONS

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes SRs. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (68 FR 18277). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

7.0 CONCLUSION

The NRC staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: R. J. Giardina, NRR

Date: September 8, 2003

Mr. Dale E. Young
Florida Power Corporation

Crystal River Nuclear Plant, Unit 3

cc:

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