



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

Ref: 10 CFR 50.90

September 13, 2007
3F0907-07

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

Subject: Crystal River Unit 3 – License Amendment Request #295, Revision 0: Extension of Allowed Outage Time to Seven Days and Elimination of Second Completion Times Response to Request for Additional Information (TAC No. MD5241)

- References:
1. Crystal River Unit 3 to NRC Letter dated September 4, 2007, "Crystal River Unit 3 – License Amendment Request #295, Revision 0: Extension of Allowed Outage Time to Seven Days and Elimination of Second Completion Times Response to Request for Additional Information (TAC No. MD5241)"
 2. NRC to Crystal River Unit 3 Letter dated July 18, 2007, "Crystal River Unit No. 3, Request for Additional Information Regarding License Amendment Request No. 295 Rev. 0, Extension of Allowed Outage Time to Seven Days and Elimination of Second Completion Times (TAC No. MD5241)"
 3. Crystal River Unit 3 to NRC Letter dated April 13, 2007, "Crystal River Unit-3 – License Amendment Request #295, Revision 0, Extension of Allowed Outage Time to Seven Days and Elimination of Second Completion Times Limiting Time"

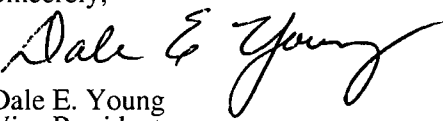
Dear Sir:

On July 18, 2007, the Nuclear Regulatory Commission (NRC) issued a Request for Additional Information (RAI, Reference 2) regarding License Amendment Request (LAR) #295 (Reference 3). On September 4, 2007, Florida Power Corporation (FPC), doing business as Progress Energy Florida, Inc., issued a response to this RAI (Reference 1). Subsequent to submittal of the RAI response, the NRC has asked two follow-up questions informally about the response. In accordance with the provisions of 10 CFR 50.90, FPC hereby provides the response to the RAI.

This letter revises regulatory commitments made in References 1 and 3. The revised commitments in Attachment B to this letter replace the commitments in References 1 and 3 in their entirety.

If you have any questions regarding this submittal, please contact Mr. Paul Infanger, Supervisor, Licensing and Regulatory Programs at (352) 563-4796.

Sincerely,


Dale E. Young
Vice President
Crystal River Nuclear Plant

DEY/dar

Attachments: A. Response to Request for Additional Information
B. List of Regulatory Commitments

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

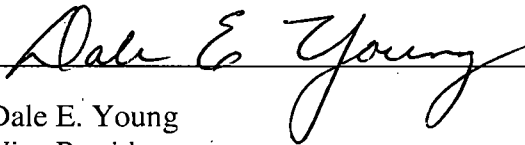
Progress Energy Florida, Inc.
Crystal River Nuclear Plant
15760 W. Powerline Street
Crystal River, FL 34428

A001
NRR

STATE OF FLORIDA

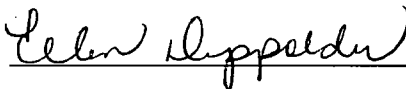
COUNTY OF CITRUS

Dale E. Young states that he is the Vice President, Crystal River Nuclear Plant for Florida Power Corporation, doing business as Progress Energy Florida, Inc.; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.



Dale E. Young
Vice President
Crystal River Nuclear Plant

The foregoing document was acknowledged before me this 13th day of Sept., 2007, by Dale E. Young.



Signature of Notary Public
State of Florida



(Print, type, or stamp Commissioned
Name of Notary Public)

Personally ☒ Known ☒ -OR- Produced ☐ Identification ☐

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

LICENSE AMENDMENT REQUEST #295, REVISION 0

**EXTENSION OF ALLOWED OUTAGE TIME TO SEVEN DAYS
AND ELIMINATION OF SECOND COMPLETION TIMES**

ATTACHMENT A

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

Request for Additional Information Response

On July 18, 2007, the Nuclear Regulatory Commission (NRC) issued a Request for Additional Information (RAI, Reference 2) regarding License Amendment Request (LAR) #295 (Reference 3). On September 4, 2007, Florida Power Corporation (FPC), doing business as Progress Energy Florida, Inc., issued a response to this RAI (Reference 1). Subsequent to the submittal of the RAI response, the NRC has asked two follow-up questions informally about the response. FPC hereby provides the following response to this RAI.

NRC Request

1. **The Crystal River 3 (CR-3) response to RAI 6 in Reference 1 regarding fire risk identified six bulleted items for fire areas which are "sensitive" to fire risk (page 8 of 16 in Attachment 1). However, only one of the bulleted items in this list is addressed in the regulatory commitments (the first, for the Decay Heat Removal [DH], Decay Heat Closed Cycle Cooling [DC] and Raw Water [RW-DC] rooms, which appears to be addressed by commitments four and five of Attachment B). It appears that CR-3 has identified fire areas as being important to fire risk, but then proposes no action be taken. Since CR-3 did not provide the specific contribution of each fire area to the calculated fire risk, it is not able to conclude that the compensatory measures proposed have any significant mitigating impact on the fire risk. Therefore, this information needs to be provided, and CR-3 needs to include all the identified fire areas in the scope of its compensatory measures.**

FPC Response

1. *From Reference 1, the text described above is as follows:*

The following fire areas showed they were sensitive to fire risk in conjunction with a DH [Decay Heat Removal], DC [Decay Heat Closed Cycle Cooling], BS [Reactor Building Spray] and RW-DC [Decay Heat Seawater] system outage:

- The opposite train DH, DC, and RW-DC rooms.
- The opposite train MCC room (480VAC and 4160 VAC).
- Non-Safety 4160VAC and 480VAC rooms.
- The opposite train battery and charger rooms.
- The opposite train Inverter rooms.
- Remote Shutdown Room.

These areas were identified in the revised fire assessment performed to support the CR-3 response to the NRC's recent RAI (Reference 2). FPC agrees that fire watches for these areas should be included in the List of Regulatory Commitments. This list has been revised to include fire watches for the above areas during all periods of extended outage (greater than 72 hours) for the DH, DC, BS or RW-DC Systems. For pre-planned extended outages, the compensatory measures will be in place for the entire system outage period. For unplanned extended outages, the compensatory measures will be put in place as soon as practical once it is known the system outage will exceed 72 hours.

NRC Request

2. **In addition, a "periodic" fire watch has been identified for "planned" outages in the regulatory commitments in Attachment B. "Periodic" needs to be defined, and this should be applied to any use of the extended CT, not just planned uses.**

FPC Response

2. *The use of the term "periodic" to describe the frequency for fire watches is meant to be consistent with the Fire Watch Program at CR-3, described in Administrative Instruction 2210, "Fire Watch Program." The Program states that it is the Fire Watch's responsibility to inspect assigned areas at least once per hour with a margin of fifteen minutes.*

FPC agrees that a periodic fire watch should be used for any extended outage, regardless of whether it is planned or not. As such, the commitments in Attachment B have been revised to state that the compensatory measures apply to all extended outages (greater than 72 hours), whether they are scheduled or emergent.

References:

1. *Crystal River Unit 3 to NRC Letter dated September 4, 2007, "Crystal River Unit 3 – License Amendment Request #295, Revision 0: Extension of Allowed Outage Time to Seven Days and Elimination of Second Completion Times Response to Request for Additional Information (TAC No. MD5241)"*
2. *NRC to Crystal River Unit 3 Letter dated July 18, 2007, "Crystal River Unit No. 3, Request for Additional Information Regarding License Amendment Request No. 295 Rev. 0, Extension of Allowed Outage Time to Seven Days and Elimination of Second Completion Times (TAC No. MD5241)"*
3. *Crystal River Unit 3 to NRC Letter dated April 13, 2007, "Crystal River Unit-3 – License Amendment Request #295, Revision 0, Extension of Allowed Outage Time to Seven Days and Elimination of Second Completion Times Limiting Time"*

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

LICENSE AMENDMENT REQUEST #295, REVISION 0

**EXTENSION OF ALLOWED OUTAGE TIME TO SEVEN DAYS
AND ELIMINATION OF SECOND COMPLETION TIMES**

ATTACHMENT B

LIST OF REGULATORY COMMITMENTS

List of Regulatory Commitments

The following table identifies those actions committed to by Florida Power Corporation (FPC) in this document. Any other actions discussed in the submittal represent intended or planned actions by FPC. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Supervisor, Licensing and Regulatory Programs of any questions regarding this document or any associated regulatory commitments.

Commitment	Due Date
CR-3 will perform procedure CP-253, "Power Operation Risk Assessment and Management," which requires both a deterministic and probabilistic evaluation of risk for the performance of all maintenance activities. This procedure uses the Level 1 PSA model to evaluate the impact of maintenance activities on core damage frequency. CR-3 will not plan any maintenance that results in "Higher Risk" (Orange Color Code) during an extended outage (greater than 72 hours) of the LPI, BS, DC or RW-DC System.	During extended (greater than 72 hours) outage on the LPI, BS, DC or RW-DC System
The Remote Shutdown Panel, the Appendix R Cooler and the opposite train of LPI, BS, DC, RW-DC, EFW, Auxiliary Feedwater System, Emergency Feedwater Initiation and Control System, HPI, and their power supplies (AC and DC) will be administratively designated as "protected" (i.e., no planned maintenance or discretionary equipment manipulation).	During extended (greater than 72 hours) outage on the LPI, BS, DC or RW-DC System
CR-3 will not initiate an extended preventive maintenance outage (greater than 72 hours) on the LPI, BS, DC or RW-DC System if adverse weather, as designated by Emergency Preparedness procedures, is anticipated.	During extended (greater than 72 hours) outage on the LPI, BS, DC or RW-DC System

List of Regulatory Commitments (Continued)

<p>When extended maintenance (greater than 72 hours) is performed (scheduled or emergent) on a train of the LPI or BS System, CR-3 will limit transient combustibles in, and establish a periodic fire watch in the decay heat pump vault of the opposite train, and the following rooms:</p> <ul style="list-style-type: none"> • Non-safety 4160 V and 480 V Switchgear Rooms • Opposite train ES 4160V and ES 480 V Switchgear Rooms • Opposite train battery room • Opposite train charger room • Opposite train Inverters room • Remote Shutdown Panel Room • Relay/CRD Room and Adjoining Corridor • 'B' EFIC Room • Cable Spreading Room 	<p>During extended (greater than 72 hours) outage on the LPI or BS System</p>
<p>When extended maintenance (greater than 72 hours) is performed (scheduled or emergent) on a train of the DC or RW-DC System, CR-3 will limit transient combustibles in, and establish a periodic fire watch in the seawater room, and the following rooms:</p> <ul style="list-style-type: none"> • Non-safety 4160 V and 480 V Switchgear Rooms • Opposite train 4160V ES and 480 V ES Switchgear Rooms • Opposite train battery room • Opposite train charger room • Opposite train Inverters room • Remote Shutdown Panel Room • Relay/CRD Room and Adjoining Corridor • 'B' EFIC Room • Cable Spreading Room 	<p>During extended (greater than 72 hours) outage on the DC or RW-DC System</p>
<p>When extended maintenance (greater than 72 hours) is performed (scheduled or emergent) on a train of the LPI, BS, DC or RW-DC System, CR-3 will limit transient combustibles and establish a periodic fire watch in the fire zones containing routed cables associated with the pressurizer PORV and PORV Block Valves. These rooms include:</p> <ul style="list-style-type: none"> • PORV/PORV Block Valve power supply breaker areas • Cable Spreading Room • Relay/CRD Room and Adjoining Corridor • Intermediate Building 119' elevation • Auxiliary Building 119' elevation • 'B' ES 4160 V Switchgear Room • Remote Shutdown Room • 'A'/'B' Battery room 	<p>During extended (greater than 72 hours) outage on the DC LPI, BS, DC or RW-DC System</p>