

**Florida
Power**
CORPORATION

August 31, 1979

File: 3-0-3-a-3

Mr. D. F. Ross, Jr.
Director
Bulletins and Orders Task Force
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Identification and Resolution of Long-Term Generic
Issues Related to the Commission Orders of May 1979

Dear Mr. Ross:

On August 23, 1979, Florida Power Corporation received your letter of August 21, 1979, identifying eight long-term issues related to the C. which must be resolved for Crystal River Unit 3 and the other B&W Operating r. s.

These eight (8) items were identified and briefly discussed in Enclosure 1 of your letter. In your discussion of Items 1, 4, 5, 7, and 8, you requested Florida Power Corporation to provide additional information and our schedule for resolution of these five (5) items by August 31, 1979.

In that regard, Florida Power Corporation hereby submits, as Attachment 1 to this letter, our response to your August 21, 1979, request for additional information.

If you require further discussion concerning our response, please contact us.

Very truly yours,

FLORIDA POWER CORPORATION

G. C. Moore
Assistant Vice President
Power Production

GCMekcF06(D5)

Attachment


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STATE OF FLORIDA

COUNTY OF PINELLAS

G. C. Moore states that he is the Assistant Vice President, Power Production, of Florida Power Corporation; 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.



G. C. Moore

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 31st day of August, 1979.



Notary Public

Notary Public, State of Florida at Large,
My Commission Expires: August 24, 1983

(CrockettNotary2 D12)

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ATTACHMENT 1

Response to Ross Letter of August 21, 1979

Item 1 - Failure Mode and Affects Analysis of the Integrated Control System

On August 17, 1979, B&W submitted to you for your review, copies of the report entitled "BAW--1564, Integrated Control System (ICS) Reliability Analysis". This letter is to advise you that this report is applicable to Crystal River Unit 3. Although this was a generic report developed by B&W, and there are differences in the secondary system designs at the various B&W plants, we feel that the conclusions reached in this report can be applied to Crystal River Unit 3. Florida Power Corporation is presently reviewing the recommendations listed in Section 3 of this report to determine what possible changes are necessary at Crystal River Unit 3 to enhance reliability and safety.

Item 4 - Auxiliary/Emergency Feedwater System Reliability Upgrade

This letter is to inform you of Florida Power Corporation's commitment to the AFW/EFW System Reliability Study proposed by B&W and discussed with you and your staff on July 19, 1979, and August 9, 1979. The draft report for Crystal River Unit 3 will be submitted by October 22, 1979, and the first report will be submitted by December 3, 1979.

Item 5 - Detailed Analysis of the Thermal-Mechanical Conditions in the Reactor Vessel During Recovery from Small Breaks With Extended Loss of All Feedwater

The above analysis will be submitted by December 21, 1979.

Item 7 - Small Break LOCA Analysis

The following is our schedule of response to the six (6) items contained in Attachment A of your letter:

- 1) A. Report will be submitted on December 1, 1979.
B. Report will be submitted on September 30, 1979.
- 2) A. Report will be submitted on September 30, 1979.
B. In response to this request, we are proposing three (3) options in preference of order:
 - 1) Provide a statement by September 30, 1979, that no small break with auxiliary feedwater will pressurize the system to the PORV setpoint.
 - 2) Provide by December 30, 1979, a qualitative assessment of the transient.
 - 3) Provide core analysis by February 1, 1980, using 0.01 ft² break with no AFW available.

We are presently proceeding with option #1, unless otherwise notified by the NRC by September 7, 1979.

- 3) A. Report will be submitted on September 30, 1979.
B. Report will be submitted on October 31, 1979.
C. Report will be submitted on September 30, 1979.
D. Report will be submitted on October 31, 1979.
- 4) An analysis of the first 100 minutes of the TMI-2 accident will be submitted by September 30, 1979.
- 5) Report will be submitted on September 30, 1979.
- 6) Report will be submitted on May 1, 1980.

Item 8 - Analysis for Loss of Feedwater and Other Anticipated Transients

"Analysis of loss of feedwater and other anticipated transients originally discussed by NUREG-0560, Section 8.4.1 has been expanded and superseded by NUREG-0578, Section 2.1.9. On August 9, 1979, B&W and the B&W Owners Group discussed a conceptual program with the NRC staff to address the Lessons Learned Task Force item. The described program entails the integration of analysis, simulation and plant event response evaluation developing symptom based guidelines for station operators to evaluate abnormal transients. Your letter indicates qualified acceptability of the program. The seven transients selected for preparation extend into all areas of plant response requiring detailed coordination between NSSS vendor and architect engineer equipment as well as the many plant specific interactions that must be considered. To provide this integration and provide a truly meaningful result, several details of the program are being further defined that will affect the quality of the evaluation but also impact schedule. Therefore, consistent with a discussion between Mr. R. Capra and Arkansas Power and Light Company on August 27, 1979, we will defer submitting a detailed schedule until September 14, 1979."

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