

**Florida
Power**
CORPORATION

August 14, 1981
File: 3-0-12
#3-081-13



Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
License No. DPR-72
Changes to Security Documents

Dear Mr. Denton:

Pursuant to the correspondence referenced below, verbal communication and request by your staff, and the need to upgrade items in the security area, Florida Power Corporation (FPC) provides the following information.

Florida Power Corporation hereby commits to supply by September 30, 1981, an amendment to the Safeguards Contingency Plan for Crystal River Unit 3 Nuclear Power Plant which will address the revised compensatory action for a guard strike contingency event.

Florida Power Corporation will be providing additional comments for resolution of the Guard Training and Qualification Plan by September 30, 1981. These comments are as a result of further clarification by your Mr. R. B. Manili on the Staff's concerns as identified in your letter dated March 6, 1981, (Reid to Hancock) and responded to by our letter dated May 26, 1981, (Baynard to Stolz).

Also, pursuant to 10 CFR 73.5, an exception of 25% (+3 months) to 10 CFR 73 Appendix B.II.E is hereby requested by FPC to resolve an issue identified in the above correspondence. The proprietary justification for this exception request is submitted via reference to FPC response to comment number six (6) in our letter dated May 26, 1981, (Baynard to Stolz) and a non-proprietary justification is as follows.

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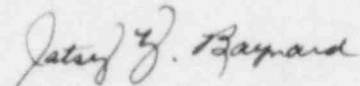
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Mr. Harold R. Denton
Page 2
August 14, 1981

Prior to the program development and development of the Plan, FPC was of the opinion that the commitment to +3 months was acceptable. Consequently, Plan development and materials that have already been formulated for training implementation under the Plan and Appendix B were formulated around the concept of requalification on the basis of once every 12 +3 months. The FPC training program has necessitated the reconfiguration of the Crystal River Security Force into a shift operation to ensure adequate requalification of the security force members. Scheduling requalification for all members of the security force in all facets of the training program on the basis of a 12 month cycle, utilizing the present shift configuration while meeting normal operation requirements, does not allow the desired flexibility which may be necessary to meet contingencies, such as outages or after unforeseen circumstances, which would require augmentation of the normal security force. The +3 months allows the flexibility to train the personnel who may miss required training in a given cycle and must wait for the scheduled instruction to be given again.

Should there be any question concerning these three items, please contact us.

Very truly yours,



Dr. P. Y. Baynard
Manager
Nuclear Support Services

DVH:mm

cc: Mr. Victor Stello
Director of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. J. P. O'Reilly, Director
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