



September 2, 1981  
3-0-3-a-6



Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72

REFERENCES: (1) Generic Letter to All Licensees (12/11/81)  
(2) FPC Response (P. Y. Baynard to D. G. Eisenhut) of 5/14/81  
(3) FPC Response (P. Y. Baynard to D. G. Eisenhut) of 7/9/81

Dear Mr. Eisenhut:

In Reference (3) above, Florida Power Corporation (FPC) modified its scheduled completion dates for compliance with your implementation of NUREG-0612 (Reference 1). We have continued to expend considerable effort in these areas and are within the intent of our schedule for all activities. All procedure changes and training will be completed prior to significant load handling activities for the specific systems are utilized in our upcoming refueling outage. Finalization of training, especially on inaccessible cranes cannot be accomplished entirely before the outage. We also anticipate that the learning curve for utilizing the new procedures will produce some changes throughout the outage. These changes will still meet the intent of NUREG-0612.

Attached are three (3) copies of Florida Power Corporation's "6-month" report. This report outlines the heavy load handling program(s) for Crystal River Unit 3 and is responsive to Section 2.1 of Reference 1. It should be recognized that FPC has not committed to the letter of NUREG-0612 or the referenced standards but rather has used these documents as guides to identify accepted industry practice. We are committed to take those actions necessary to assure adequate reliability in our load handling operations and have made substantial changes toward that end. The program, as described in the attached, meets the intent of NUREG-0612, referenced industry standards and your letter.

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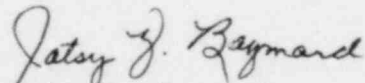
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FPC will address the issues raised by Section 2.2, 2.3 and 2.4 in accordance with the schedule provided in Reference 2 except as noted below. FPC will make necessary modifications to handling systems to meet the intent of NUREG-0612 without awaiting prior NRC staff review. However, we do not anticipate major modifications at this time and plan to justify any substantial variances with specific NUREG-0612 requirements based on quantitative and/or qualitative assessments of actual hazards associated with various handling operations. These assessments will address the items covered in Section 5.3, Safety Evaluation, of NUREG-0612.

As mentioned in Section 4, one load handling system, the Auxiliary Building Crane (FHC-5), is being addressed as a separate matter. FPC has not resolved the "cask-drop" issue to date and is pursuing final resolution of this matter outside the generic heavy load handling program. Concerns raised by NUREG-0612, et al, will be addressed as part of the "cask-drop" review.

Very truly yours,

FLORIDA POWER CORPORATION



Patsy Y. Baynard  
Manager, Nuclear Support Services

KRW:gs

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