

**Florida
Power**
CORPORATION

September 14, 1981

File: 3-B-4

#3-091-10

Mr. John F. Stolz
Operating Reactors Branch No. 4
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Crystal River Unit No. 3
Docket No. 50-302
Operating License No. DPR-72
Relief from ASME Pressure Testing Code



Dear Mr. Stolz:

The current Inservice Inspection Program at Crystal River Unit 3 is based on ASME Section XI, 1974 Edition through Summer 1975 Addenda.

This letter is to advise you that Florida Power Corporation has determined that a portion of the ASME Section XI Code, concerning "System Pressure Testing" of systems following modifications, repairs, or replacements, is not feasible for use at Crystal River Unit 3. Therefore, Florida Power Corporation requests generic relief from the hydrostatic test requirements of Article IWC 5000 of ASME Section XI while work is being performed on the main feedwater piping between the steam generators and the first upstream isolation valves (see attached).

For example, plans have been made to remove and replace a drain valve (FWV-183) during the Fall 1981 Refueling Outage at CR-3. In this case, conforming to the code is impractical since it would involve pressurization of the steam side of the steam generators. The attendant problems this could cause make this procedure highly undesirable (e.g., additional maintenance on the main steam stop check valves, possible water in the turbine). Additional concerns include unnecessarily degrading steam generator "B" in addition to damage caused by loose parts of the burnable poison rods.

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General Office 3201 Thirty-fourth Street South • P.O. Box 14042, St. Petersburg, Florida 33733 • 813-866-5151

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Mr. John F. Stolz

U.S. Nuclear Regulatory Commission

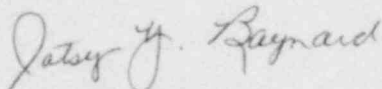
September 8, 1981

Although modification, repair, or replacement work on the subject section of main feedwater piping can not be hydrostatically tested while maintaining isolation of steam generators for test purposes, a rigorous non-destructive examination (NDE) program will be carried out for all necessary welds.

Florida Power Corporation maintains the position that the intent of the ASME Code requirement can be met through the NDE program for the subject feedwater piping section. We consider this to be a high priority item and, therefore, request that your response be issued as soon as possible or no later than October 15, 1981. This will facilitate scheduling of work to be performed during our upcoming refueling outage.

Very truly yours,

FLORIDA POWER CORPORATION



Patsy Y. Baynard

Manager

Nuclear Support Services

KFP:cmd

Attachments

