

**Florida  
Power**  
CORPORATION

July 6, 1983  
3F-0783-08

Mr. H.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  
Operating License No. DPR-72  
Technical Specification Change Request No. 105 Supplement

Dear Mr. Denton:

During a July 1, 1983 teleconference with your staff, it was determined that it would be appropriate for FPC to document its continued request for relief from certain test requirements which were originally addressed in the subject request.

Our letters of January 14 and 20, 1983 supplied information to support three basic requests:

- 1) Change the frequency of the monthly manual activation test to refueling;
- 2) Concur with FPC's evaluations of potential risk associated with monthly automatic actuation logic testing and thereby grant relief from such testing (in conformance with Regulatory Guide 1.22 Position D.4); and
- 3) Defer all testing associated with actuated equipment until Refuel IV.

The staff granted the third request in Amendment 61 dated January 24, 1983. FPC remains in the position described in earlier letters and discussed in a meeting with the staff on January 17, 1983 and, therefore, requests a continuance of that relief until Refuel V either by approving Request No. 105 or by extending the duration of the interim relief provided in Amendment 61.

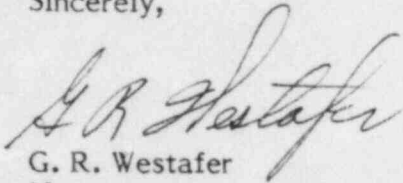
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FPC has completed Item 2 of our "Proposed Program for Permanent Resolution" contained in the enclosure(s) to the January 14, 1983 letter. We are prepared to perform the monthly functional testing of the 3-of-10 groups identified in Table 1 attached to the January 20, 1983 letter (i.e., HPI-3, LPI-1, and LPI-2). Additionally, FPC has (or will immediately prior to entry into Mode 4) successfully completed the testing required during Refuel IV (including the Manual Initiation Functional Units). FPC remains committed to pursuing Item 3 (detailed engineering study/redesign) during Cycle V and will provide a detailed schedule, including opportunity for NRC pre-implementation review by no later than October 1983.

Sincerely,



G. R. Westafer  
Manager  
Nuclear Licensing and Fuel Management

KRW/mlg

cc: Mr. J. P. O'Reilly  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
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