

**Florida
Power**
CORPORATION

October 12, 1982
#3F-1082-13
File: 3-B-1

Mr. John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
10 CFR 50.44(C)(3)(iii)
High Point Vents for the Reactor Vessel Head

Dear Mr. Stolz:

Florida Power Corporation (FPC) requests an exemption to 10 CFR 50.44(C)(3)(iii) such that for Crystal River Unit 3 (CR-3) a reactor vessel head high point vent is not required. Therefore, the first sentence of the subject section shall read:

"To provide improved operational capability to maintain adequate core cooling following an accident, by the end of the first scheduled outage beginning after July 1, 1982 and of sufficient duration to permit required modifications, each light-water nuclear power reactor shall be provided with high point vents for the reactor coolant system, and for other systems required to maintain adequate core cooling if the accumulation of noncondensable gases would cause the loss of function of these systems."

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This exemption request is the final step in our program which was proposed in our letter to you dated May 10, 1982. This step is a result of receiving the documents as listed in your letter to FPC dated June 23, 1982, which were utilized in the development and the review of comments on that part of 10 CFR 50.44 (C)(3)(iii) which deals with the high point vent for the reactor vessel head (Attachment 1).

That review revealed no technical basis requiring a reactor vessel head high point vent but only that such a vent should be required. Because such a vent would

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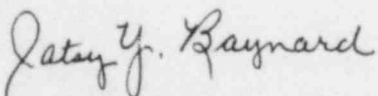
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"provide additional assurance of meeting the requirements of 10 CFR 50.46 (LOCA criteria)" does not automatically make it necessary to require it. Other factors that are plant-specific must be considered in order to make comprehensive decisions.

In response to the requirement of NUREG-0737 (Clarification of TMI Action Plan Requirements) Item II.B.1 (Reactor Coolant System Vents), FPC submitted on January 30, 1981, a report entitled "Position Paper on Reactor Vessel Head Vents" which provided alternative methods for performing the functions which we envision the vent performing. These methods include reactor system high point vents on the hot legs and operator guidelines contained in the Abnormal Transient Operating Guidelines (which were developed to meet the requirements of NUREG-0737, Item I.C.1 "Short-Term Accident and Procedures Review"). It is important to note that our submittal was not utilized (or rejected) in the development of this regulation as confirmed by your letter to FPC dated June 23, 1982. This exemption request is complete in itself and is therefore justified since CR-3 can perform the functions that the vent would perform.

In the alternative, upon notification from the NRC that the above requested exemption is denied, FPC will begin the process of design and procurement of the high point vent for the reactor vessel head in an orderly scheduled manner consistent with all other NRC requirements. To implement this alternative, an exemption to the first sentence of 10 CFR 50.44 (C)(3)(iii) needs to be granted such that the date, July 1, 1982, from which the installation schedule for the high point vents for the reactor vessel head is begun is extended until the vent system is designed, engineered, procured and received. Installation then would occur at the first scheduled outage of sufficient duration to permit the required modifications subsequent to the receipt of the vent system.

Very truly yours,



Dr. Patsy Y. Baynard
Assistant to Vice President
Nuclear Operations

RMB/myf

cc: Mr. J.P. O'Reilly,
Regional Administrator
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta St., Suite 3100
Atlanta, GA 30303

Attachment 1

1. 9/13/79 Letter to Licensees of All Operating Nuclear Power Plants from D. Eisenhower on "Followup Actions Resulting from the NRC Staff Reviews Regarding the TMI-2 Accident".
2. 10/30/79 Letter to Licensees of All Operating Nuclear Power Plants from H. Denton on "Discussion of Lessons Learned Short-Term Requirements".
3. 11/80 NUREG-0737, "Clarification of TMI Action Plan Requirements".