

**Florida  
Power**  
CORPORATION

3F-1181-07  
3-0-26  
November 10, 1981

Mr. Harold A. 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  
Facility Operating License No. DPR-72  
October 23, 1981 meeting on  
NUREG-0737, Items II.B.1, II.F.2, II.K.3.30

Dear Mr. Denton:

This letter expresses our understanding of the agreements reached in the meeting of October 23, 1981, with you and members of your Staff. In summary, the Staff concluded that it is not clear that further verification testing of our SB LOCA methods is required, and agreed to participate in an in-depth review of the current B&W SB LOCA Methods Program, including the verification testing base. This review is to begin as soon as practical, and will include the review of results achieved with the improved models and methods now being developed. This review is to be completed within one month of the completion of the SB LOCA Methods Program (presently scheduled for June 1, 1982) or June 1, 1982, whichever is earlier.

In addition, the Staff stated that a commitment to RCS vents and water level measurement would support their continued confidence in the Babcock & Wilcox system.

Based on the above understanding, Florida Power Corporation is committed to the following:

1. We will participate in a joint effort with the Staff to assure that our current SB LOCA methods and ATOG efforts are fully understood. To this end, Florida Power Corporation will participate in the SB LOCA Computer Model Upgrade Program with the B&W Owners Group. The joint effort with the Staff will include the following:

-Code parameters, models, assumptions, etc., which are important in controlling dynamics of interest will be identified, and available experimental data substantiating their validity will be reviewed. This would be done using results of the improved

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evaluation model in order that the most accurate dynamic response characteristics are reviewed.

-Additional experimental data, from separate effects or integral tests, will be defined which address specific technical gaps, if any. Our position is not one of opposition to additional testing. Instead, we want to assure that questions which must be answered are answered in the most appropriate, technical, and cost-effective manner.

-Identify where and how additional experimental data may be obtained, if any is required.

With your cooperation, we commit to complete this program within one month of completion of the SB LOCA program, or June 1, 1982, whichever is earlier.

2. As requested in the meeting, we are providing a summary of Dr. Roy's presentation on the philosophy underlying ATOG. The attached, "Abnormal Transient Operating Procedures for Nuclear Power Plants," by J.J. Kelly and D.H. Williams, includes the total scope of the ATOG approach, as well as the philosophy presented by Dr. Roy.
3. In order to provide further support to the Staff's confidence in the B&W designed systems, we are continuing to proceed with the installation of RCS vents in the pressurizer and the hot legs on a schedule agreed upon with the Staff.

It is Florida Power Corporation's commitment to proceed with design and installation of reactor coolant system water level indication instrumentation. We expect to conclude the conceptual design, and submit a detailed engineering and installation schedule by May 16, 1982. A principal consideration will be the ability of the system to provide the operator with valid and unconfusing data. It will be our intention to work closely with the NRC during this development to assure that final plans meet this requirement.

4. In response to Dr. Mattson's question, we will provide information on the formation of steam during normal operating transients, including rapid cooldown. A schedule for the submittal of the information will be developed separately.

We believe this letter reflects the major conclusions and agreements reached in the October 23, 1981, meeting.

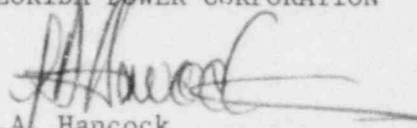
The B&W Owners Group is prepared to begin the review of our SB LOCA Methods Program with the Staff and request that the assigned Staff reviewer contact Mr. Lou Lanese of GPUNC to establish the details for carrying out this review. It is our intent to implement this review without impacting the current schedule for the completion of the SB LOCA Methods Program.

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Florida Power Corporation thanks you for the opportunity to discuss these concerns with you and your staff, and we look forward to such joint cooperation in the future.

Very truly yours,

FLORIDA POWER CORPORATION

A handwritten signature in dark ink, appearing to read "J.A. Hancock", with a long horizontal flourish extending to the right.

J.A. Hancock  
Assistant Vice President,  
Nuclear Operations

PYB/mjd

Attachment (1)