

**Florida
Power**
CORPORATION

March 26, 1990
3F0390-22

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Technical Specification Change Request No. 183, Rev. 0
Decay Heat Removal Power Source Requirements

Dear Sir:

Florida Power Corporation (FPC) hereby submits Technical Specification Change Request No. (TSCRN) 183, Revision 0, requesting an amendment to Appendix A of Operating License No. DPR-72. The proposed replacement page for Appendix A is enclosed. Replacement pages for Technical Specifications submitted under the Technical Specification Improvement Program, TSCRN 171, dated August 25, 1989, are not included since this change does not affect TSCRN 171.

This change request proposes to add a footnote to Technical Specification 3.9.8.2 which would allow the normal or emergency power source to be inoperable for each decay heat removal loop when in Mode 6 with the water level above the top of the irradiated fuel less than 23 feet (consistent with the B&W STS model Specification 3.9.8.2). The necessary information providing justification for this change request is enclosed.

FPC submitted a request for temporary waiver of compliance, in accordance with NRC's recommendations, on March 23, 1990, to allow for the use of the B&W STS model specification in order to support entry into Mode 6 during Crystal River Unit 3's current refueling outage.

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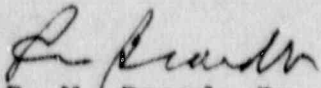
3F0390-22

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FPC respectfully requests NRC review and approval of this change request at its earliest convenience in order to minimize the time for which the temporary waiver of compliance is required to be in effect.

Sincerely,



P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

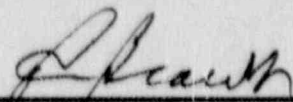
Enclosures

xc: Regional Administrator, Region II
Senior Resident Inspector

STATE OF FLORIDA

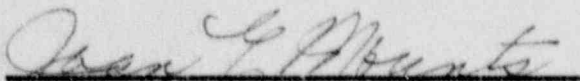
COUNTY OF PINELLAS

P.M. Beard, Jr. states that he is the Senior Vice President, Nuclear Operations for Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.



P.M. Beard, Jr.
Senior Vice President
Nuclear Operations

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 26th day of March, 1990.



Notary Public

Notary Public, State of Florida at Large
My Commission Expires:

Notary Public, State of Florida
My Commission Expires Oct. 6, 1990
Bonded Thru Troy Fair - Insurance Inc.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER

FLORIDA POWER CORPORATION

DOCKET NO. 50-302

CERTIFICATE OF SERVICE

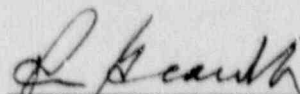
P.M. Beard, Jr. deposes and says that the following has been served on the Designated State Representative and Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,
Board of County Commissioners
of Citrus County
Citrus County Courthouse
Inverness, FL 32650

Administrator
Radiological Health Services
Department of Health and
Rehabilitative Services
1323 Winewood Blvd.
Tallahassee, FL 32301

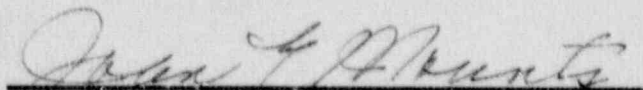
A copy of Technical Specification Change Request No. 183, Rev. 0, requesting Amendment to Appendix A of Operating Licensing No. DPR-72.

FLORIDA POWER CORPORATION



P.M. Beard, Jr.
Senior Vice President
Nuclear Operations

SWORN TO AND SUBSCRIBED BEFORE ME THIS 26th DAY OF MARCH, 1990.


Notary Public

Notary Public, State of Florida at Large

My Commission Expires:

Notary Public, State of Florida

My Commission Expires Oct. 6, 1990.

Bonded Thru Troy Fain Insurance Inc.

FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72
REQUEST NO. 183, REVISION 0
DECAY HEAT REMOVAL POWER SOURCE REQUIREMENTS

LICENSE DOCUMENT INVOLVED: Technical Specifications

PORTIONS: 3.9.8.2

DESCRIPTION OF REQUEST:

This change request proposes to add a footnote to Technical Specification 3.9.8.2 which would allow the normal or emergency power source to be inoperable for each decay heat removal loop when in Mode 6 with the water level above the top of the irradiated fuel less than 23 feet.

REASON FOR REQUEST:

Entry into Mode 6 currently requires two Decay Heat removal loops to be operable, including normal and emergency power sources, when there is less than 23 feet of water above the fuel assemblies. Furthermore, the normal and emergency power sources for each decay heat loop must remain operable during the lowered water level condition. Since it is necessary during refueling outages to perform maintenance on electrical power sources, such as the emergency diesel generators, they are routinely removed from service prior to and during Mode 6 operations. Therefore, this change request is proposed to allow either the normal or the emergency power source to be inoperable for each decay heat loop prior to entry into, and during, Mode 6 operations with less than 23 feet of water above the fuel assemblies.

EVALUATION OF REQUEST:

The NRC requested by letter dated June 11, 1980, D. G. Eisenhower to All Operating Pressurized Water Reactors, that licensees submit Technical Specifications to provide for redundancy in reactor decay heat removal capability in all modes. A model B&W STS Specification was included in the letter for use by the licensee. Florida Power Corporation (FPC) submitted Technical Specification Change Request No. (TSCRN) 65 on February 16, 1984, which was intended to be consistent with the model B&W STS Specification 3.9.8.2. However, FPC inadvertently omitted the "*" and footnote which would have allowed for the normal or emergency power source to be inoperable for each decay heat removal loop. The NRC issued Amendment 117 on May 31, 1989 consistent with FPC's TSCRN 65.

The new Specification, 3.9.8.2 (Amendment 117), is only applicable in Mode 6, and as such, will be utilized for the first time during Crystal River Unit 3's (CR-3) current refueling outage. During planning activities for entry into Mode 6, it was discovered that the specification cannot be met since maintenance activities on a diesel generator are planned to occur simultaneously with the refueling water level less than 23 feet above the top of the fuel. Based on the omission of the above mentioned power source footnote, CR-3 Specification 3.9.8.2 is unnecessarily restrictive in that it currently requires two independent power sources to be operable for each decay heat loop. The model B&W STS Specification 3.9.8.2, provided by the NRC in the June 11, 1980 letter, states "the normal or emergency power source may be inoperable for each decay heat removal loop."

FPC submitted a request for temporary waiver of compliance, in accordance with NRC's recommendations, on March 23, 1990, to allow use of the above mentioned footnote in order to support entry into Mode 6 during CR-3's current refueling outage.

SHOLLY EVALUATION OF REQUEST:

Using the standards in 10 CFR 50.92, this amendment will not involve a significant hazards consideration for the following reasons:

1. This amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. Operation of the facility in accordance with the requested action will not involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated. Redundant decay heat removal loops will be provided with adequate assurances of a reliable power source for each decay heat loop. Therefore, the probability of occurrence is not increased and the consequences of previously evaluated accidents are not affected.
2. This amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated. Operation of the facility as proposed will not create the possibility of a new or different kind of accident than previously evaluated. Assurance of adequate decay heat removal capability is maintained with redundant decay heat removal loop operability. Therefore, no new accident conditions are created as a result of this request.
3. This amendment will not involve a significant reduction in a margin of safety. Operation of the facility in accordance with the requested action will not involve a reduction in the margin of safety. Redundant decay heat removal loops will be provided with adequate assurances of a reliable power source for each decay heat loop. The clarification of power sources necessary for the decay heat removal system is consistent with guidance provided by the NRC in its June 11, 1980, letter, and requirements established for other licensees. This clarification is also consistent with the B&W STS model Specification 3.9.8.2.