

**Florida
Power**
CORPORATION

June 18, 1982
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File: 3-0-26

Mr. Darrell G. Eisenhut, Director
Division of Licensing
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
NUREG-0737, Item II.E.1.2
Auxiliary (Emergency) Feedwater System
Automatic Initiation and Flow Indication

Dear Mr. Eisenhut:

On April 14, 1982, Florida Power Corporation (FPC) submitted a completion schedule for the subject item pursuant to 10CFR50.54(f) as requested by NRC letter dated March 17, 1982. Specifically, FPC stated the design of the Emergency Feedwater Initiation and Control (EFIC) System was complete, the procurement of equipment and pre-outage installation was ongoing, and the System would be installed and operable prior to startup at the end of the upcoming Spring 1983 Refueling Outage (Refuel IV). Subsequent to the April 14, 1982 letter, FPC worked toward the Refuel IV completion date in all activities relating to the EFIC System. However, in the past three days, we have determined that the proposed schedule is neither practical nor operationally safe. The EFIC System installation is presently planned for the Fall 1984 Refueling Outage (Refuel V). Pursuant to 10CFR50.54(f), reasons for the delay and the interim work and compensatory measures are delineated below.

FPC management contends major modifications to any power plant must be well designed, procured, and then installed in a reasonable manner. While the EFIC System has been well designed (with multiple reviews), it is a first-of-a-kind system, and as with any such system, there are always unanticipated problems in procurement, design interfaces,

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installation and/or operation. These problems will further impact procedure revisions and licensed operator training which is a significant effort at the end of any refueling outage. The present schedule for pre-outage and outage installation mandates that the time for resolution of these problems would affect the critical path of Refuel IV. This is an unacceptable situation. Restated, to begin a modification on an operational system with no assurance the system can be returned to operability within the present scope of Refuel IV is not in the best interest of FPC or our customers.

The equipment procurement is not proceeding at a rate to assure equipment will be available for the scheduled installation. With this equipment noted below as with other equipment that could possibly be received at the beginning of or during Refuel IV, our experience is that with such late delivery dates, there is not sufficient time to allow for well planned staging for installation and the resolution of any problems that do occur in areas such as receipt inspection, etc. Specific areas of concern involving equipment and procurement are:

- (1) The control valves for this system are manufactured by Target Rock Company and are being used in a first-of-a-kind application. The testing, therefore, required to qualify the valves is extensive and shipment is not expected before March, 1983. (It was not feasible to use already qualified valves since they are air operated and to upgrade the CR-3 air system to safety grade would be very costly and take longer to complete than to proceed with the Target Rock valves.)
- (2) The sixteen (16) steam generator level transmitters are another cause for delay. The environmental qualification report on the transmitters of the two vendors being considered will not be completed until August, 1982. Immediate ordering in August, 1982, would result in delivery either at the beginning of Refuel IV or in July, 1983, depending on the vendor chosen. This again is beyond the deadline for Refuel IV installation.
- (3) The EFIC cabinets are needed on site on or about January 1, 1983, for pre-Refuel IV installation. The delivery has already slipped 30 days beyond this date and further slippage outside of the control of FPC could and probably will occur.
- (4) The qualified air handling units for the EFIC cabinet room have a forty-four (44) week delivery time. FPC is presently in the bid process for these units. Based on the above lead time, they could not be delivered until May, 1983, at the earliest.

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Another area of concern is the effect of the implementation of 10CFR50, Appendix R on the EFIC System. The preliminary indications of our evaluation (being completed this month) are that the criteria of Appendix R has a significant impact on the Emergency Feedwater (EFW) System and, thus, on EFIC. An unknown time will be required to incorporate these mandated changes into our installed EFW System and EFIC design.

As a result of the above procurement and design considerations, an overall rescheduling of the installation portion of the project is proceeding with four major phases: (1) pre-Refuel IV; (2) Refuel IV; (3) post-Refuel IV (or pre-Refuel V); and (4) Refuel V. Basically, the work to be performed during each phase is:

- Phase 1 - Install all outside containment equipment that is delivered in time for installation
- Phase 2 - Install all inside containment equipment that is delivered in time for installation
- Phase 3 - Install remainder of outside containment equipment and connect to inside containment equipment
- Phase 4 - Install remainder of inside containment equipment and connect to emergency feedwater piping and control systems.

The specific work to be completed during Refuel IV is: (1) install instrument tubing from the steam generators to the pressure transmitter locations; (2) install the pressure transmitters (if they are delivered in time); (3) run the conduit and cable from the pressure transmitter locations to the interior containment penetration; and (4) drill conduit cores from the cable spreading room to the control room.

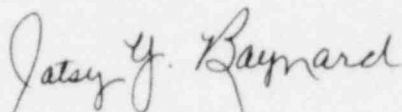
FPC has worked closely with the NRC in developing the EFIC System which represents a significant enhancement in plant safety over that required by NUREG-0737, Item II.E.1.2 and an increase in CR-3 reliability. FPC now perceives that proceeding with the installation of the EFIC System during Refuel IV would be adverse to the safety and reliability of CR-3 for the reasons stated above.

As stated in our letter to you dated December 15, 1980, "(t)his EFW upgrade will be incorporated at the first available outage of sufficient duration following completion of engineering and procurement" (Enclosure 2, page 7). That outage is now Refuel V. In the interim, FPC has installed and will continue to utilize a reliable control-grade, redundant

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system which meets the single failure criteria to automatically initiate emergency feedwater and to indicate the emergency feedwater delivery system to each steam generator. The methods by which we have implemented the interim system are discussed in our letters to you dated November 17, 1979, and January 11, 1980. These interim measures (including operation training and system familiarity) and the improvement to CR-3 which will be achieved by the EFIC System is the basis for the continued operation of Crystal River Unit 3 pending completion of the EFIC System installation.

Very truly yours,



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

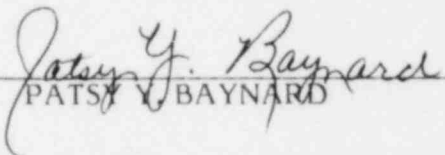
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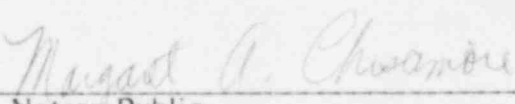
cc: Mr. J. P. O'Reilly, Regional Administrator
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 3100
Atlanta, GA 30303

STATE OF FLORIDA
COUNTY OF PINELLAS

PATSY Y. BAYNARD states that she is the Assistant to the Vice President, Nuclear Operations, of Florida Power Corporation; that she 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 her knowledge, information, and belief.


PATSY Y. BAYNARD

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 18th day of June, 1982.


Notary Public

Notary Public, State of Florida at Large,
My Commission Expires: May 29, 1984