

Florida Power

CORPORATION

Crystal River Unit 3

Docket No. 50-302

October 15, 1993
3F1093-12

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Technical Specification Change Request No. 171, Revision 1

Reference: A. FPC to NRC letter, 3F0889-14, dated August 25, 1989
B. NUREG 1430, "Standard Technical Specifications for Babcock and Wilcox Plants", dated September 1992

Dear Sir:

Florida Power Corporation (FPC) hereby submits Technical Specification Change Request No. (TSCRN) 171, Revision 1, Technical Specification Improvement, which provides replacement pages to those submitted as part of Reference A. The replacement pages (Attachment 1) reflect the results of numerous meetings between FPC and NRC Staff personnel on the content of the Improved Technical Specifications (ITS) for Crystal River Unit 3 (CR-3). The extensive efforts devoted to development of the ITS have resulted in a document that is consistent in form and content with Reference B for plant-specific design differences, operating practices, and established licensing basis positions.

All Limiting Conditions for Operation (LCOs) in current CR-3 Technical Specifications were assessed against the selection criteria in the NRC Interim Policy on Technical Specifications Improvements for Nuclear Power Reactors (52 FR 3788) as part of Reference A. This assessment was validated in light of the Commission's issuance of the Final Policy Statement (58 FR 39132) on July 22, 1993.

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LCOs which satisfied one or more of the selection criteria in the Policy Statement were retained in the ITS; those that did not had their requirements relocated to the appropriate FPC document. Relocated material will be treated as an NRC commitment with changes processed in accordance with the administrative controls established for the respective document. The list of documents modified to contain this material includes the Final Safety Analysis Report (FSAR), the Quality Assurance Plan, implementing procedures, etc. In all cases, a 10 CFR 50.59 or more stringent process has been applied.

FPC recognized the increased emphasis placed on the 10 CFR 50.59 process as a result of ITS implementation. To that end, FPC committed in Reference A to modify the CR-3 administrative controls which implement 10 CFR 50.59 to address the improvements outlined in NSAC-125, "Guidelines for 10 CFR 50.59 Safety Evaluations," dated June 1989. This action has been completed.

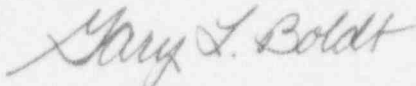
CR-3 Nuclear Licensing personnel met with NRC Technical Specifications Branch, Projects, and Region II Staff on July 9, 1993, to discuss ITS implementation issues. One of the items discussed was the phased implementation of Surveillance Requirements (SR) with respect to ITS implementation. FPC proposed an approach whereby new or significantly modified SRs would not be required to be performed prior to implementation, provided there was reasonable expectation the SR could be successfully performed. The proposed approach would levelize some of the burden of ITS implementation but deviates from typical practice where the requirements are verified and operability is demonstrated prior to implementation. FPC proposes that a license condition be used to provide the mechanism, within the license, to exempt the performance of these SRs until the next performance opportunity. The proposed license condition to address the phased implementation of these new requirements is included as Attachment 2.

FPC has reviewed the attachments and concludes the changes which have occurred since Reference A was submitted do not adversely affect the safety significance or Sholly evaluation provided with the August 25, 1989, submittal of TSCRN 171. This submittal has also been reviewed and approved as a proposed change to Technical Specifications by the Plant Review Committee and the Nuclear General Review Committee in accordance with existing Technical Specification sections 6.5.1.6.c and 6.5.2.8.c.

Additional correspondence related to implementation of the ITS will be transmitted under separate cover letter. Included in the scope of this correspondence are documents necessary to implement the ITS which require submittal to the Commission (i.e., Pressure Temperature Limits Report and the Core Operating Limits Report). An FSAR update will also be submitted prior to Refuel Outage 9, currently scheduled to begin in April 1994.

FPC requests the NRC issue the ITS license amendment on or before November 1, 1993, and requests this amendment be implemented within 120 days after issuance in order to support our current implementation schedule.

Sincerely,



G. L. Boldt
Vice President
Nuclear Production

Attachments

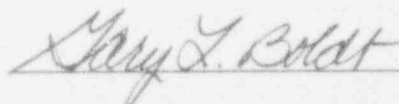
GLB/BPW:ff

xc: Regional Administrator, Region II
NRR Project Manager
Senior Resident Inspector

STATE OF FLORIDA

COUNTY OF CITRUS

G. L. Boldt states that he is the Vice President, Nuclear Production 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.

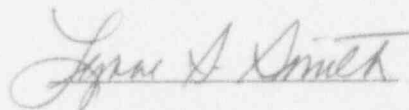


G. L. Boldt
Vice President
Nuclear Production

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 15th day of October, 1993.



Notary Public (print)



Notary Public (signature)

Notary Public, State of Florida at Large
Notary Public, State of Florida at Large
My Commission Expires Dec. 18, 1995
My Commission Expires Bonded thru Agent's Notary Brokerage

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER)

FLORIDA POWER CORPORATION)

DOCKET NO. 50-302

CERTIFICATE OF SERVICE

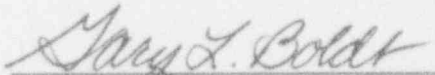
G. L. Boldt deposes and says that the following has been served on the Designated State Representative and Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,
Board of County Commissioners
of Citrus County
Citrus County Courthouse
Inverness, FL 34450

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


A copy of Technical Specification Change Request No. 171, Revision 1, requesting Amendment to Appendix A of Operating Licensing No. DPR-72.

FLORIDA POWER CORPORATION



G. L. Boldt
Vice President
Nuclear Production

SWORN TO AND SUBSCRIBED BEFORE ME THIS 15TH DAY OF OCTOBER, 1993


Notary Public (print)


Notary Public (signature)

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

My Commission Expires Dec. 18, 1995
Bonded thru Agent's Notary Brokerage