

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

October 25, 1993
3F1093-15

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

Subject: Withdrawal of Technical Specification Change Request No. 197

Reference: A. FPC to NRC letter, 3F0993-16, dated September 20, 1993
B. FPC to NRC letter, 3F1093-12, dated October 15, 1993
C. FPC to NRC letter, 3F0889-14, dated August 25, 1989

Dear Sir:

Florida Power Corporation (FPC) submitted Technical Specification Change Request No. (TSCRN) 197 on September 20, 1993 (Reference A). The submittal proposed a revision to the structural integrity inspection requirements for containment tendons, anchorages, and adjacent concrete surfaces contained in Crystal River Unit 3 (CR-3) Technical Specification 4.6.1.6.1 and 4.6.1.6.2 based on the 1989 Edition of the ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWL. FPC understood the NRC was in the process of endorsing this standard with some exceptions. FPC proposed the updated testing methodology in anticipation of the fifth tendon surveillance and implementation of the Improved Technical Specifications (ITS) for CR-3. As discussed in the ITS implementation meeting with Region II and NRR, the overlap in performing these two activities necessitated addressing tendon testing prior to issuance of the ITS amendment. It has been determined the proposed approach needs to be modified.

During discussions on the content of TSCRN 197, the NRC Staff informed FPC it would be unduly cumbersome to reference the IWL Subsection in a license application until such time as the Staff completed endorsement of the guidance. The NRC Staff suggested the use of Regulatory Guide 1.35, Revision 3 as an acceptable alternative technical basis. FPC has since re-reviewed the guidance in the Regulatory Guide and concluded, with one exception, that this would be acceptable. The exception is related to the timing for testing tendons deferred as part of the fifth CR-3 tendon surveillance and is discussed in detail in Attachment 1.

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The tendon testing requirements provided to the NRC in Reference B (ITS) have been modified to reflect the commitment to Regulatory Guide 1.35, Revision 3. Discussions with the NRC Technical Branch has indicated that proposed Conditions B and C of the applicable ITS LCO (3.6.1) no longer reflect current Staff requirements. The CR3 ITS shall be modified to eliminate these Conditions.

FPC requests the affected sections be issued in advance of the balance of the ITS amendment and become effective immediately upon issuance. We further request these sections be issued on or before November 1, 1993 in order to support the current schedule for testing. Due to the substantive change to TSCRN 197, FPC and NRC agreed withdrawal of the TSCRN was appropriate. FPC hereby withdraws TSCRN 197.

The approach proposed in this letter does not affect the safety significance or Sholly evaluation provided with the August 25, 1989 submittal of TSCRN 171 (Reference C). The revised pages to implement the tendon testing surveillance requirements, in advance of the ITS, are provided as Attachment 2. Changes from current Technical Specification requirements are indicated by a vertical bar in the right hand margin.

Sincerely,



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

PMB/BPW:ff

Attachments

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

Proposed Exception to Regulatory Guide 1.35, Revision 3

The following documents FPC's position on Regulatory Guide 1.35, Revision 3, Regulatory Position C.2.5, for the fifth CR-3 tendon surveillance. Regulatory Position C.2.5 states:

"If, owing to plant operating conditions, a randomly selected tendon from a group cannot be inspected during a scheduled inspection, another sample from the group should be randomly selected. The tendon that was selected but not inspected should be inspected during the following plant shutdown and accepted (or rejected) on an individual tendon basis." (Emphasis added)

For the purposes of the fifth tendon surveillance, FPC evaluated the effect of deferring the inspection of tendons which were selected, but not inspected, to the following plant shutdown (the upcoming Refuel Outage 9). Five randomly selected tendons will be excluded from the current surveillance based on operational considerations. In particular, the testing will be performed with the plant on-line. The location of these tendons, in the Main Steam Safety Valve relief zone, constitutes a personnel safety hazard. Alternate tendons have been selected and will be tested.

FPC proposes to perform testing on the deferred tendons during the next tendon surveillance currently scheduled for Refuel Outage 10 in April 1996. This will result in a period of approximately two years between the upcoming Refuel Outage 9 plant shutdown (per the Regulatory Guide) and subsequent tendon testing. The proposed testing schedule is considered adequate based upon the following considerations.

- * FPC reviewed the results of the first four CR-3 tendon surveillances. A total of 77 tendons have been tested, with 35 of these tendons located in the steam vent zone. All tendons, including those in the steam vent zone, have passed the current Technical Specification requirements. Therefore, operating history indicates deferring testing of these tendons until 10R does not increase the potential for undetected degradation during that time.

FPC also assessed previous CR-3 tendon surveillance results against the criteria in Regulatory Guide 1.35, Revision 3, even though Revision 3 was not a requirement at the time the tests were performed. Based upon this review, several tendons would have exceeded the allowable minimum measured prestress force. FPC was not required to inspect adjacent tendons at that time, but fully intends to comply with the guidance in the Regulatory Guide should this occur during the fifth tendon surveillance.

- * The Regulatory Guide specifies the upcoming Refuel Outage 9 plant shutdown in order to ensure all testing for a given surveillance is performed in close time-proximity. This ensures a "snap-shot in time" of tendon conditions and precludes an operating effect which occurs during the initial and subsequent performance from statistically skewing the data for the entire surveillance. Considering CR-3 has been in commercial operation for 17 years and has never failed the Technical Specification acceptance criteria, FPC considers the deferral of tendon testing until 10R unlikely to adversely affect the data obtained from the surveillance.

- * The additional costs associated with bringing the vendor back during the upcoming refueling outage and the limited availability of the vendor, create very substantial resource problems. There is a significant one-time setup cost which is incurred each time the vendor comes onsite; regardless of the number of tendons tested. Because of this, it is not cost effective to bring the vendor back several months later solely to test a few tendons.

ATTACHMENT 2