

**Florida
Power**
CORPORATION

June 17, 1983
3F-0683-09

Mr. Harold R. 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
Operating License No. DPR-72
Supplemental Information in Support of Technical Specification Change
Request No. 82

Dear Mr. Denton:

This provides additional information in support of Cycle 5 operation with Reactor Coolant Pump Power Monitors (RCPPM's). The proposed Cycle 5 Technical Specifications submitted on March 31, 1983, for operation with RCPPM's include additional time delay to preclude spurious plant trips associated with disturbances external to the RCPPM system. The total trip delay time to start of negative reactivity insertion has been increased from the 620 ms used during Cycle 4 to 1.5 seconds for Cycle 5.

As a result of the spurious trips, authorization was obtained for continued operation in Cycle 4 at lower power levels with RCPPM's bypassed. Equipment was then installed for measurement of the duration of disturbances which would have caused actuation of the RCPPM function. A total of nine disturbances were identified which would have caused actuation of the RCPPM trip function with the trip delay time previously in use. None of these would have caused RCPPM trip actuation with the currently proposed 1.5 second trip delay time.

An analysis was also performed by B&W during Cycle 4 to determine minimum DNBR for a 4 pump coastdown transient as a function of RCPPM trip delay time.

The results of this analysis show:

	Trip Delay Time	Minimum DNBR
4 pump coastdown from 4 pump operation	1.5 sec	1.97
	1.88 sec.	1.83

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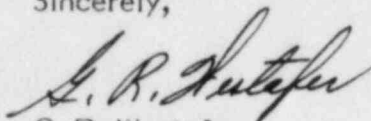
These results show that substantial margin is associated with the proposed 1.5 second trip delay time. A trip delay time as long as 1.88 seconds provides acceptable minimum DNBR. The trip delay time of 1.5 sec in the proposed Technical Specifications provides at least 380 ms margin in response time (1.88 sec - 1.50 sec) for the RCPPM trip.

For this reason Florida Power Corporation now believes that the requirement for testing of the RCPPM system potential transformers, current transformers, and watts transducer time response, which was identified in the NRC Safety Evaluation supporting Amendment No. 55 is no longer necessary and should be removed. Measurement of the time response for a complete RCPPM channel including sensor requires trip of a reactor coolant pump. Florida Power Corporation considers this test to be potentially destructive to pump seals.

Florida Power Corporation now considers the findings associated with RCPPM response time testing which were identified in the NRC Safety Evaluation associated with Amendment No. 55 have now either been satisfied or are no longer applicable.

A correction is required to Table 3.3-2, Item No. 8, in the proposed Technical Specifications. The response time for pump status based on RCPPM trip should be 1.44 seconds. This is the 1.5 second total response time minus the 60 ms for release of the control rod drive roller nut from the lead screw.

Sincerely,



G. R. Westafer
Manager
Nuclear Licensing and Fuel Management

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