

**Florida
Power**

CORPORATION

June 24, 1983

3F-0683-13

Mr. H. 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
Request No. 109

Dear Mr. Denton:

Enclosed are three (3) originals and forty (40) copies of Request No. 109 requesting amendment to Appendix A of Operating License No. DPR-72. As part of this request, the proposed pages are enclosed.

This amendment will allow Florida Power Corporation to take compensatory action other than the establishment of a continuous fire watch when a penetration fire barrier is found to be non-functional.

Florida Power Corporation considers this amendment not likely to involve a Significant Hazard Consideration. Additionally Florida Power Corporation requests that this amendment be granted as soon as possible consistent with exigent change requests. Currently approximately 34 persons per day are required to maintain the continuous fire watch at a cost of \$100,000 per month. This appears excessive in comparison to the cost of an hourly fire watch (approximately \$3,000/month).

Florida Power Corporation considers Request No. 109 to be a Class III Amendment per 10 CFR 170.22 as it involves a single safety issue. Accordingly, a check for four thousand dollars (\$4,000) is enclosed.

Sincerely,

G. R. Westafer
Manager
Nuclear Fuel and Licensing Management

PGH/mlg

Enclosure

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PDR ADDCK 05000302
P PDR

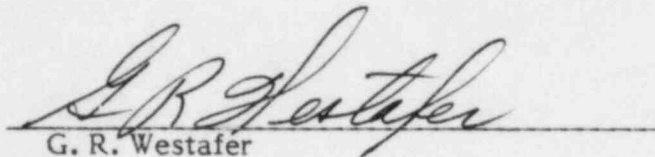
cc: Mr. J. P. O'Reilly, Regional Administrator
Office of Inspection and Enforcement, Region II
U. S. Nuclear Regulatory Commission
101 Marietta St. N.W., Suite 2900
Atlanta, Georgia 30303

Handwritten notes:
A006 1/1
w/check \$4,000

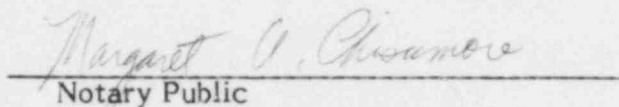
STATE OF FLORIDA

COUNTY OF PINELLAS

G. R. Westafer states that he is the Manager, Nuclear Licensing and Fuel Management, of 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. R. Westafer

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 24th day of June, 1983.


Notary Public

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

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF)
) DOCKET NO. 50-302
FLORIDA POWER CORPORATION)

CERTIFICATE OF SERVICE

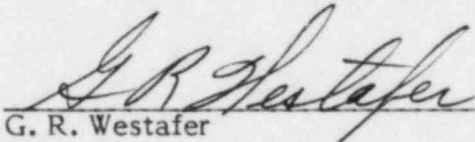
G. R. Westafer deposes and says that the following has been served on the Designated State Representative and the Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

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

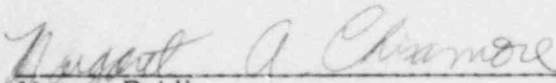
One (1) copy of Technical Specification Change Request No. 109 requesting amendment to Appendix A of Operating License No. DPR-72.

FLORIDA POWER CORPORATION



G. R. Westafer
Manager
Nuclear Licensing and Fuel Management

SWORN TO AND SUBSCRIBED BEFORE ME THIS 24th DAY OF JUNE 1983.



Notary Public

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

(NOTARIAL SEAL)

**FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72
REQUEST NO. 109, REVISION 0
PENETRATION FIRE BARRIERS**

LICENSE DOCUMENT(S) INVOLVED: Technical Specification, Appendix A

PORTION(S): 3.7.12, page 3/4 7-47

NRC REVIEW AND APPROVAL IS REQUIRED PRIOR TO IMPLEMENTATION.

REGULATORY BASIS: 10 CFR 50.59, Change to Technical Specifications

DESCRIPTION OF REQUEST:

Change the ACTION statement and Bases Section of the Penetration Fire Barriers specification to allow compensatory action other than the establishment of a continuous fire watch near the non-functional barrier.

Specifically, the following action should be taken when any of the required fire barrier penetrations are non-functional:

With one or more of the above required fire barrier penetrations non-functional, within one hour either, establish a continuous fire watch on at least one side of the affected penetration, or verify the OPERABILITY of fire detectors on at least one side of the non-functional fire barrier and establish an hourly fire watch patrol. Restore the non-functional fire barrier penetration(s) to functional status within 7 days or, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the action taken, the cause of the non-functional penetration and plans and schedule for restoring the fire barrier penetration(s) to functional status.

REASON FOR REQUEST:

The current specification addressing Penetration Fire Barriers requires establishment of a continuous fire watch when any barrier is non-functional. Other courses of action exist that can be taken to mitigate the consequences of a fire and that will require less expenditure of manpower costs. The availability of another approved course of action will also allow more operational flexibility to determine the most effective action to take.

In a case particular to Crystal River Unit 3, the discovery that installed fire dampers are certified as one and a half hour fire barriers (rather than the required three hours) has lead to the establishment of a large number of fire watches. This is requiring considerably more manpower than would be necessary to maintain a roving fire watch and to verify the operability of the fire detection systems.

EVALUATION OF REQUEST:

The requirement to establish a roving fire watch and verify the operability of fire detection system or establish a continuous fire watch assures that a fire in the affected area is detected early enough to initiate protective actions. This requirement is consistent with NUREG-0103,

Revision 4, Standard Technical Specifications for Babcock and Wilcox Pressurized Water Reactors. Thus, issuance of a license amendment including this requirement will not:

- (1) Involve a significant increase in the probability or consequence of an accident previously evaluated; or
- (2) Create the probability of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

REFERENCES:

NUREG-0103, Rev. 4, Standard Technical Specifications for Babcock & Wilcox Pressurized Water Reactors, page 3/4 7-41.

NUREG-0800, Standard Review Plan, Section 9.5.1-7, pp. 9.5.1-1 - 52.

10 CFR 50.91 (b)

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Docket No: 50-302/License No. DPR-72

Facility: Crystal River Unit 3

Licensee: Florida Power Corporation

Date of Application: June 24, 1983

Request for: Issuance of Request No. 109

This request changes the compensatory action requirements addressing non-functional fire barrier penetrations to allow establishment of a roving fire watch and verification of fire detection system operability in lieu of the establishment of a continuous fire watch.

Significant Hazards Consideration Determination:

- (x) Amendment involves no significant hazards considerations.
- () Amendment involves significant hazards considerations.

Basis for Determination:

This change is consistent with the Staff's recommendations concerning fire barrier penetrations published in NUREG-0103, Revision 4, Standard Technical Specifications for Babcock and Wilcox Pressurized Water Reactors and is consistent with the acceptance criteria in the Standard Review Plan. Therefore, this amendment is similar with the examples given in FR 14864 as typically not including a significant hazards consideration.

Requested Implementation Date:

Florida Power Corporation requests this amendment be granted as soon as possible consistent with exigent change requests. An evaluation has indicated that the resources that are necessary to provide compensatory action could be greatly decreased without a significant reduction in safety. Currently approximately 34 persons per day are required to maintain the continuous fire watch at a cost of approximately \$100,000 per month. This appears excessive in comparison to the cost of an hourly roving fire watch (approximately \$3,000 per month).

Lic Chg Req