

**Florida
Power**
CORPORATION

Crystal River Unit 3
Docket No. 50-302

April 4, 1991
3F0491-01

Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Revised Response to Generic Letter 89-04
Guidance on Developing Acceptable Inservice Testing Programs

Reference: FPC to NRC - Letter dated October 3, 1989

Dear Sir:

The referenced letter provided Florida Power Corporation's (FPC) response to the Staff positions stated in Generic Letter 89-04. Attachment 1, Part B of that letter identified the need for four modifications that FPC considered necessary to meet the intent of those positions. FPC has subsequently re-evaluated the need for those modifications and is hereby providing a revised summary of each issue.

ISSUE:

Installation of flow instrumentation for full-stroke exercising of CHV-91, CHV-95 and CHV-202.

STATUS:

This modification will not be necessary. Existing instrumentation is adequate for flow determination for CHV-91 and CHV-202. CHV-95 does not require full stroke testing based on its function. The Pump and Valve Program will be updated to reflect this determination.

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ISSUE:

Installation of flow instrumentation for full-stroke exercising of DCV-23 and DCV-24.

STATUS:

This modification will not be necessary. DCV-23 and DCV-24 do not require full stroke exercising based on their safety function. The Pump and Valve Program will be updated to reflect this determination.

ISSUE:

Installation of pressure instrumentation for closure verification of DHV-33 and DHV-36.

STATUS:

The modification studied was determined to be not capable of providing the expected means for testing these check valves in accordance with Position 2 of Generic Letter 89-04. FPC is evaluating alternatives to meet the intent of the Generic Letter. A resolution and proposed schedule for this item will be provided within 90 days after discussion with the NRC staff.

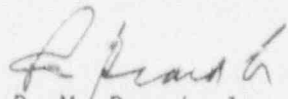
ISSUE:

Installation of flow instrumentation for the Makeup and Purification Pumps minimum flow recirculation line.

STATUS:

FPC has determined that existing instrumentation is adequate to meet the intent of Positions 1, 3 and 9 of Generic Letter 89-04 regarding full flow testing of check valves; back flow testing of check valves; and pump testing using the minimum flow recirculation line. Therefore, no modification is required.

Sincerely,



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

PMB:LVC
Attachment

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