

**Florida  
Power**  
CORPORATION

April 15, 1983  
3F-0483-12

Director of Nuclear Reactor Regulation  
Attention: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
Generic Letter 82-33, Supplement 1 to NUREG-0737  
Requirements for Emergency Response Capability

Dear Sir:

Florida Power Corporation (FPC) has received and reviewed the subject letter. As required, FPC is furnishing a proposed schedule for completing each of the basic requirements for the items identified in the enclosure to the subject letter. In addition, a description of our plans for phased implementation and integration of the emergency response activities is being submitted as requested.

While FPC is committed to implementing the requirements of the subject letter, there are several programmatic philosophies that must be understood to fully recognize the intent of the management of FPC in that implementation. First, the schedule being proposed is a long range schedule of approximately five (5) years. Due to pressures and influences beyond our control, we realistically expect this schedule to change over that period of time. Therefore, FPC is committed to implement that part of the enclosed schedule from April 15, 1983, to April 15, 1984. At that time and annually thereafter, we will revisit the schedule as it has unfolded and make future schedular commitments as necessary.

Secondly, this schedule has not been developed with a narrow view of only these regulatory requirements. Over the next year, the requirements to be implemented have been determined to be schedularly feasible in conjunction with other regulatory requirements. In the long term, the schedule must be coordinated with known regulatory requirements (e.g., remote shutdown panel, Emergency Feedwater Initiation and Control system, and Inadequate Core Cooling Instrumentation) and with regulatory requirements that are not presently known. This represents another need to revisit the proposed schedule in the future.

*A003  
Add: W. Paulson*

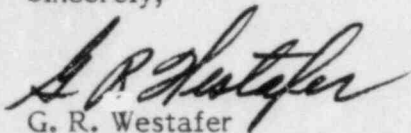
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FPC is proposing that some requirements be implemented in parallel. Specifically, the Detailed Control Room Design Review will be started in the near term. The Emergency Operating Procedures (EOP's) will be implemented within a year. It is not necessary to wait for this implementation as the EOP's are revised when plant modifications are implemented.

Finally, the FPC training program is an integral part of the Nuclear Operations modification system. As with the EOP's, training takes place when any modification is implemented during the normal operator requalification program. Therefore, training is listed for each item and one separate but fully integrated training program for the requirements for emergency response capability is neither proposed nor necessary.

Attachment 1 to the letter presents a cross-reference table between the NUREG-0737 Items and the Supplement 1 to NUREG-0737 Items. Attachment 2 is a tabular schedule for each item in Supplement 1 to NUREG-0737. Attachment 3 is a line schedule for each item in the subject letter broken down into the phrases of each item and with the specific requirement for each item listed in the appropriate phase. Attachment 3 also contains the estimated refueling schedules for Crystal River Unit 3 as well as the annual schedule revisit in April of each year.

Sincerely,



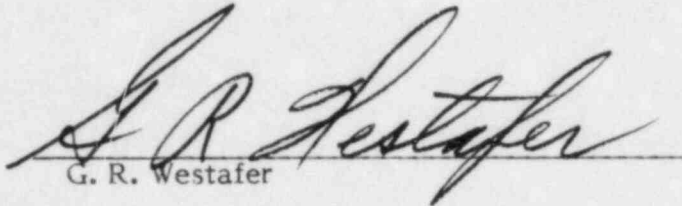
G. R. Westafer  
Manager  
Nuclear Licensing and Fuel Management

Attachments

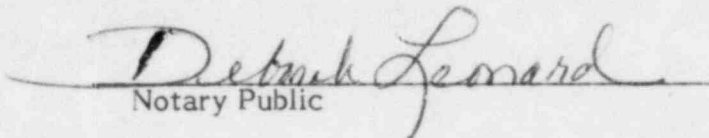
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STATE OF FLORIDA  
COUNTY OF PINELLAS

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 15th day of April, 1983.

  
Notary Public

Notary Public, State of Florida at Large,  
My Commission Expires: November 19, 1986

NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXPIRES NOV 19 1986  
BONDED THRU GENERAL INSURANCE UND

Attachment 1

<u>Subject</u>	<u>NUREG-0737 Item</u>	<u>Supplement 1 to NUREG-0737 Item</u>
Guidance for the Evaluation and Development of Procedures for Transient and Accidents	I.C.1	7.1
Control Room Design Reviews	I.D.1	5.1
Plant Safety Parameter Display Console	I.D.2	4.1, 6.1.b
Upgrade Emergency Support Facilities	II.A.1.2	6.1.c, 6.1.d, 8.2, 8.3, 8.4
Meteorological Data	III.A.2.2	6.1.b

## Attachment 2

### Tabular Schedule for NUREG-0737 Supplement 1 Revision 0, April 15, 1983

Item Number	Response	Attachment 3 Activity Number
4.1.a	The general requirements for SPDS listed in this paragraph will be incorporated at FPC by the engineering documents used to procure and install our system. There is no reportable milestone for this activity.	932
4.1.b	Same as 4.1.a	932
4.1.c	Same as 4.1.a	932
4.1.d	Same as 4.1.a	932
4.1.e	Same as 4.1.a	932
4.1.f	Same as 4.1.a	932
4.2.a	The written safety analysis for the SPDS shall be prepared during the Engineering Phase of the project and shall be submitted by the end of the 3rd Quarter of 1984.	932
4.2.b	Appropriate Technical Specification change request will be submitted at least 90 days prior to the completion of installation.	936
4.3	SPDS design shall be used as an input to the assessment phase of the DCRDR. The design shall also be considered as an input to revision of the EOP's for use after implementation.	932, 914 and 922
5.1.a	The objective of the control room design review will be utilized in the FPC plan scheduled to be completed in the 3rd Quarter of 1983.	910
5.1.b	FPC will conduct a control room design review. This is scheduled to be completed during the 2nd Quarter of 1984.	912
5.1.c	FPC will assess which engineering discrepancies are significant and should be corrected. This is scheduled to be completed during the 1st Quarter of 1985.	914
5.1.d	FPC will verify that each selected design improvement will provide the necessary correction and can be safely introduced into the control room. This is scheduled to be completed during the 1st Quarter of 1985.	914



Item Number	Response	Attachment 3 Activity Number
5.2.a	FPC will submit a program plan within two (2) months after the start of the Review. This is scheduled for the 4th Quarter of 1983.	912
5.2.b	FPC will submit a summary report of the completed review. This is scheduled for the 2nd Quarter of 1985.	914
5.2.g	FPC will <u>not</u> begin the control room upgrade until the staff has issued an SER and FPC has addressed any open items. This is scheduled to begin in the 3rd Quarter of 1985.	916 and 922
6.1.a	The requirements of Regulatory Guide 1.97 will be considered during the Compliance Study and Systems Study Phase of this project. There is no reportable milestone for these activities dictated by this item.	950 and 952
6.1.b	FPC will provide the report listed in Item 6.2 to satisfy the requirements of this paragraph.	952
6.1.c	Same as 6.1.b	952
6.1.d	Same as 6.1.b	952
6.2	FPC shall submit a report satisfying the specifications of this paragraph and showing FPC's position on all items in Regulatory Guide 1.97 in the 3rd Quarter of 1984.	952
7.1.a	FPC is committed to using human factored, function oriented EOP's.	Complete
7.1.b	FPC has prepared Technical Guidelines.	Complete
7.1.c	FPC is currently writing the upgraded EOP's consistent with the Technical Guidelines and the Procedures Generation Package previously submitted to the NRC. Activity completion scheduled for the end of the 3rd Quarter of 1983.	920
7.1.d	Training on the upgraded EOP's is scheduled to be completed during the 1st Quarter of 1984.	920
7.1.e	Implementation scheduled for the end of the 1st Quarter of 1984.	920
7.2.a	FPC has submitted Technical Guidelines	Complete
7.2.b	FPC has submitted the Procedures Generation Package	Complete
8.2.1.a	The general requirements for the TSC have been included in the design of the TSC.	Complete

Item Number	Response	Attachment 3 Activity Number
8.2.1.b	The location requirement of the TSC has been included in the design of the TSC.	Complete
8.2.1.c	The accommodations requirement of the TSC has been included in the design of the TSC.	Complete
8.2.1.d	The TSC was structurally built in accordance with the Uniform Building Code.	Complete
8.2.1.e	The controlled environment requirement of the TSC has been included in the design of the TSC.	Complete
8.2.1.f	The radiological protection and monitoring equipment requirement has been included in the design of the TSC.	Complete
8.2.1.g	The communications requirement for the TSC has been included in the design of the TSC.	Complete
8.2.1.h	The data requirement for the TSC has been included in the design of the TSC. The data display equipment is scheduled to be completed in the 1st Quarter of 1984.	964
8.2.1.i	The records requirement for the TSC has been included in the design of the TSC.	Complete
8.2.1.j	The staffing requirement for the TSC has been included in the design of the TSC.	Complete
8.2.1.k	The human factors engineering principle requirement for the TSC has been included in the design of the TSC.	Complete
8.3.1.a	The general requirements for the OSC have been included in the design of the OSC.	Complete
8.3.1.b	The location requirement for the OSC has been included in the design of the OSC.	Complete
8.3.1.c	The communication requirement for the OSC has been included in the design of the OSC.	Complete
8.4.1.a	The general requirements for the EOF have been included in the design of the EOF.	Complete
8.4.1.b	The location requirement for the EOF has been included in the design of the EOF.	Complete
8.4.1.c	The accommodation requirement for the EOF has been included in the design of the EOF.	Complete

Item Number	Response	Attachment 3 Activity Number
8.4.1.d	The EOF was structurally built in accordance with the Uniform Building Code.	Complete
8.4.1.e	The controlled environment requirement for the EOF has been included in the design of the EOF.	Complete
8.4.1.f	The communications requirement for the EOF has been included in the design of the EOF. This is scheduled to be completed in the 3rd Quarter of 1983.	960
8.4.1.g	The data requirement for the EOF has been included in the of the EOF. This is scheduled to be completed in the 1st Quarter of 1984.	964
8.4.1.h	The records requirement for the EOF has been included in the design of the EOF.	Complete
8.4.1.i	The staffing requirement for the EOF has been included in the design of the EOF.	Complete
8.4.1.j	The security requirement for the EOF has been included in the design of the EOF.	Complete
8.4.1.k	The human factors engineering principles requirement for the EOF has been included in the design of the EOF.	Complete



# Attachment 3

## Schedule for NUREG-0737 Supplement 1 Revision 0, April 15, 1983

