

**Florida
Power**
CORPORATION

April 12, 1984
3F0484-11

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
Attention: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Inservice Testing Program

Dear Mr. Denton:

In accordance with 10CFR 50.55a (g)(4) and (g)(5) Florida Power Corporation (FPC) hereby requests a change to the Inservice Testing (IST) program requirements for Crystal River, Unit 3 (CR-3). The current IST program is conducted in accordance with Section XI of the ASME Boiler and Pressure Vessel Code 1974 edition and addenda through summer of 1975. 10CFR 50.55a (b) (2) adopts Section XI editions through the 1980 edition and addenda through winter 1981. Section IWP-3400 of the code edition in effect at CR-3 requires monthly operational testing of pumps. FPC requests that approval be granted to perform pump operational tests at the frequency specified in section IWP-3400 of the 1980 edition, which is quarterly. Based on our review of Section XI requirements associated with IWP-3400 it is FPC's position that there are no related requirements which must be implemented upon approval of this change.

In NUREG-1024, "Technical Specifications - Enhancing the Safety Impact," the NRC Staff Task Force on Technical Specifications addresses the subject of periodic testing frequency. The report states, "In addition, frequent periodic testing of systems, with no compensating reduction in risk to the public, results in unnecessary diversion of operators and other plant personnel, economic costs, and, in some cases, excessive exposure to plant personnel which may be adverse to safety." Since the 1980 edition of the code and addenda have been endorsed by the NRC, and based on conversations with your staff and responsible NRC/OIE personnel, we have concluded that monthly versus quarterly pump testing provides no demonstrable or expected reduction in risk to the public.

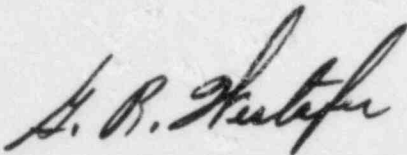
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It is FPC's position that quarterly testing of pumps offers the advantages of reducing wear on equipment, reducing opportunities for personnel errors, and reducing radiation exposure while reliably demonstrating pump operability. Quarterly versus monthly testing at CR-3 would not result in increased risk to the public, but should in fact be an improvement in overall plant safety and reliability. The absence of this relief is costing FPC several thousands of dollars for contract support of the IST program. Therefore, your prompt attention will be appreciated.

Sincerely,



G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

SCP/nsw

cc: Mr. J. P. O'Reilly
Regional Administrator, Region II
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
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