

**Florida
Power**
CORPORATION

April 13, 1984
3F0484-12

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
NUREG 0737, Supplement 1
Proposed Schedule for Implementation of Requirements
for Emergency Response Capability

Dear Sir:

In accordance with Florida Power Corporation's (FPC) letter to you dated May 31, 1983, the annual schedule for the subject referenced commitments is submitted. FPC has updated its schedule for those activities which have been completed and for those activities which have been more clearly defined.

Predicting long-term schedules based on several ongoing programs is difficult. Therefore, we have amended the schedule to indicate only the beginning of presently unpredicted phases.

In your letter and confirmatory order to FPC dated March 15, 1984, the Emergency Response Facilities were required to be fully functional by July 2, 1984. As a result of problems experienced with the Emergency Dose Assessment System (EDAS) Dry Run Acceptance test, it was learned that serious developmental design problems exist within the data acquisition portion of the system such that the system will not function as designed. Further review by and a subsequent meeting with the vendor revealed that an independent review by FPC was required to determine the specific problems and a dependable schedule for the completion of this project. FPC will provide a schedule for completion of this project on or before July 2, 1984. Of the 25 items associated with the Emergency Response Facilities, only 2 items remain open due to the EDAS System. In the interim, FPC has a simplified computer model that is presently used for dose assessment.

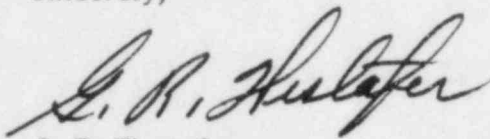
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In your confirmatory order dated February 21, 1984, attachment item 3b states that the Regulatory Guide 1.97 Implementation (installation or upgrade) requirements will be completed by February 28, 1986. In the previously submitted schedule of FPC's May 31, 1983 letter to you, we stated that February 28, 1986 was a beginning, not completion date for this item. This is a reasonable milestone that is consistent with the overall Regulatory Guide 1.97 implementation. FPC requests that the schedule in your confirmatory order be modified accordingly.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. R. Westafer".

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

EMG/feb

Attachment

ATTACHMENT I

<u>SUBJECT</u>	<u>NUREG-0737 ITEM</u>	<u>SUPPLEMENT I to NUREG-0737 ITEM</u>
Guidance for the Evaluation and Development of Procedures for Transients and Accidents	I.C.1	7.1, 7.2
Control Room Design Reviews	I.D.1	5.1, 5.2
Plant Safety Parameter Display Console	I.D.2	4.1, 4.2, 4.3 6.1.b
Upgrade Emergency Support Facilities	III.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

Item Number	Response	Activity Number (See Attachment 3)
4.1.a	The engineering documents used to procure and install SPDS will incorporate these general requirements.	932, 934 936
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 will be prepared during the Engineering Phase of the project and will be submitted by the end of the 3rd Quarter of 1984.	933
4.2.b	Appropriate Technical Specification change requests will be submitted at least 90 days prior to the completion of installation.	935
4.3	SPDS design will be integrated into the assessment phase of the CRDR. The design will be considered as an input to revision of the EOP's.	932, 914
5.1.a	The objective of the control room design review will be utilized in the FPC plan which was completed in the 3rd Quarter of 1983.	910 Complete
5.1.b	FPC will complete a review of the control room 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 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

ATTACHMENT 2 (Cont'd.)

Item Number	Response	Activity Number (See Attachment 3)
5.2.a	FPC will submit a program plan within two (2) months after the start of the Review. This was completed in the 4th Quarter of 1983.	913 Complete
5.2.b	FPC will submit a summary report of the completed assessment. This is scheduled for the 2nd Quarter of 1985.	915
5.2.g	FPC will not begin the control room upgrade until the staff has issued a SER and FPC has addressed any open items. We will provide a detailed schedule for Control Room modifications and operator training by July 1, 1985.	916
6.1.a	The requirements of Regulatory Guide 1.97 will be considered during the Compliance Study and Systems Study Phase of this project. Results of these studies will be integrated in our Control Room Design review.	950, 952
6.1.b	FPC will satisfy the requirements of this paragraph in the systems study.	952
6.1.c	Same as 6.1.b.	952
6.1.d	Same as 6.1.b.	952
6.2	FPC will submit a report describing its compliance with the requirements of this paragraph and showing FPC's position on all items in Regulatory Guide 1.97 in the 3rd Quarter of 1984. Identified deviations from the requirements of RG 1.97 will initiate the engineering phase of FPC's compliance and allow FPC to submit a detailed procurement schedule by January 2, 1985 and a schedule for installation and training by February 28, 1986.	953, 954, 956, 958
7.1.a	FPC is committed to using human factored, function oriented EOP's.	Complete
7.1.b	FPC has prepared Technical Guidelines.	919 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 was completed by the end of the 3rd Quarter of 1983.	920 Complete
7.1.d	Training on the upgraded EOP's was completed prior to the 1st Quarter of 1984.	920 Complete
7.1.e	Implementation was completed by the 1st Quarter of 1984.	920 Complete
7.2.a	FPC has submitted Technical Guidelines.	919 Complete

ATTACHMENT 2 (Cont'd.)

Item Number	Response	Activity Number (See Attachment 3)
7.2.b	FPC has submitted the Procedures Generation Package including a program for the validation of EOP's.	919 Complete
8.2.1.a	The general requirements for the TSC have been included in the design of the TSC.	Complete
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.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 (a) recall data display equipment was completed in the 1st Quarter of 1984; (b) the EDAS data display equipment installation schedule will be issued on or before July 2, 1984.	964 (a) Complete
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

ATTACHMENT 2 (Cont'd.)

Item Number	Response	Activity Number (See Attachment 3)
8.4.1.c	The accommodation requirement for the EOF has been included in the design of the EOF.	Complete
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.	Completed
8.4.1.f	The communications requirement for the EOF has been included in the design of the EOF. This was completed in the 3rd Quarter of 1983.	960 Complete
8.4.1.g	The data requirement for the EOF has been included in the design of the EOF. (a) This was installed by the end of 1983 and (b) a schedule for EOF personnel trained in EDAS operation by July 2, 1984.	962, 964 (a) Complete
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

