

**Florida  
Power**  
CORPORATION

May 4, 1984  
3F0584-03

Director of Nuclear Reactor Regulation  
Attention: Mr. John F. Stolz, Chief  
Operating Reactors Branch #4  
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  
Technical Specification Change Request No. 112  
Steam Generator Operating Level  
Exigent Approval Request

Dear Sir:

Florida Power Corporation (FPC) hereby requests that the subject Technical Specification Change Request (TSCR) as submitted on January 30, 1984, and supplemented on March 20, 1984, be granted on an exigent basis.

Crystal River Unit 3 is presently limited to 97% full power due to our Steam Generator level limitations as listed in the referenced Technical Specification. This 30 MW limitation is costing our customers approximately \$20,000 per day in replacement fuel cost, and is continuing to get more restrictive each day.

It should be noted that Steam Generator operating limits are applicable only to Toledo Edison and FPC since they are the only B&W plants with Standard Technical Specifications. Other B&W plants with plant-specific (custom) technical specifications do not generally have similar secondary side operating limits but instead use operationally-oriented limits that ensure the necessary super heated steam.

FPC has been active in pursuing this problem since mid last year and has participated with numerous other B&W owners and contractors in trying to find the proper solution.

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In mid 1983, FPC had estimated a one-year lead time before the change in Steam Generator level limits would be necessary. However, it became evident in December, 1983, that the level was increasing at a faster than anticipated rate and that plant generation would begin to be limited in the April to May, 1984, time frame. FPC completed our internal reviews and initially submitted the subject TSCR on January 30, 1984 with a requested approval date of March 1, 1984. Increased fouling has occurred despite best efforts by FPC in performing several "hot soaks" of the Steam Generator during recent plant shutdowns and evaluating other methods to decrease the fouling in the Steam Generator and thus the operating level. During the outage earlier last month, a fill-soak-boil/drain was performed on both Steam Generators during shutdown and startup as well as full cold, wet layup during the outage. Not even this effort resulted in a measurable decrease in the Steam Generator operating levels.

During the NRC review of this TSCR, one question from the Mechanical Engineering Branch was identified. This dealt with the concern of raising the Steam Generator level above the "aspirator ports" and possibly overstressing the tube-to-lower-tubesheet interface. Since this would have lead to less than acceptable super-heated steam, FPC considered this an operational problem (as do custom technical specification B&W plants) and not a licensing problem. In an effort to expedite the NRC review and approval process, FPC internally reviewed a supplement to the TSCR which limited the Steam Generator operating level so that the "aspirator ports" could not be flooded and submitted it on March 20, 1984. At that time, FPC documented that Crystal River Unit 3 was limited to 98% full power and requested that the subject TSCR be pursued on an exigent or emergency basis. The power limiting operation had begun in February, 1984, which was two months earlier than our previous prediction.

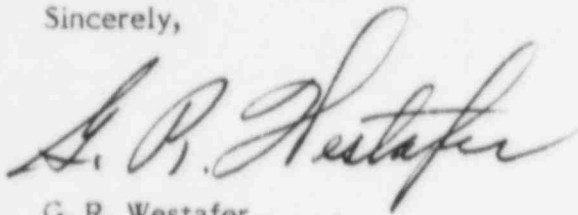
The TSCR was reviewed and license amendment noticed in the Federal Register on April 25, 1984, with the proposed implementation date of May 25, 1984. The approval of this exigent request could implement the license amendment on May 9, 1984.

The present plant operation is limited by both the Steam Generator operating level restrictions and the condenser temperature rise limitations of the Environmental Protection Agency (EPA). FPC is concurrently pursuing permanent EPA approval for a change in the condenser temperature rise limitations. However, when the license amendment is implemented, the plant can achieve full power operation with more frequent condenser cleaning than is now warranted because of the Steam Generator operating level restrictions.

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Your most expeditious review and approval of this request is necessary so that Florida Power Corporation can give its customers safe, cost effective power from the Crystal River Unit 3 nuclear power plant.

Sincerely,

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

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

RMB/feb

xc: Mr. J. P. O'Reilly  
Regional Administrator, Region II  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
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Atlanta, GA 30303