

# Florida Power

CORPORATION  
Crystal River Unit 3  
Docket No. 90-302

May 26, 1995  
3F0595-19

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Subject: Control Complex Habitability Envelope Design Basis

Gentlemen:

On March 21, 1995, Florida Power Corporation (FPC) made a 10 CFR 50.72 telephone report (Event #28564) associated with the potential for not having maintained the Control Complex Habitability Envelope (CCHE) within its design basis. We have not yet completed all of the assessments necessary to determine, with certainty, the most appropriate definition of that design basis. Further, recent industry/NRC interaction associated with the revised accident source terms (NUREG-1465) are likely to allow significant changes in some of the events mitigated by these same design features. Nevertheless, certain corrective actions will be appropriate regardless of the outcome of these assessments. The purpose of this letter is to provide a summary of some of the corrective actions we have or will be taking and to promote a constructive dialogue regarding certain of the open items that require NRC concurrence or feedback.

One of these items is associated with whether or not breaches of the CCHE, above whatever final limit is calculated, constitute operation outside the design basis per 10 CFR 50.72 and/or entry into LCO 3.0.3. Related design features (toxic gas instrumentation, radiation detectors, etc) are allowed to be out of service for at least one (1) hour even if the functions (both trains) are unavailable. Thus, a rationale exists to support some allowed outage time for the CCHE. We understand that there are or will be internal NRC discussions on this subject and look forward to a constructive dialogue with you after those discussions have reached an appropriate juncture.

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Ultimately, such an allowance is an appropriate Technical Specification (TS) feature. The attachment to this letter is a model TS treatment that we plan to submit in coming weeks. Such a TS may be appropriate for most plants whether they employ a standard pressurized control room or other designs like Crystal River Unit 3 (CR-3). We are providing the draft TS to the NRC, but not submitting it at this time for formal review to allow for feedback from the industry/NRC TSIP effort, as well as to allow FPC to more fully develop the supporting technical basis. We will work through our NRR Project Manager to gain any preliminary feedback as may be appropriate.

While the CCHE is principally a structure composed of walls, ceilings and floors, our current concern is with the doors which provide access to and from the CCHE. The most common CCHE integrity problem that faces FPC is a CCHE breach caused by a door ajar, i.e. the door is essentially shut, but not closed tightly enough to seal the opening. Considering the low probability of an event that challenges the CCHE and the very conservative modeling assumptions used in assessing the consequences of that event, FPC believes that some period must be allowed for a door breach to be restored before immediate reports are made or actions taken that would require plant mode changes.

In the interim, FPC will continue to take actions to improve the reliability of the CR-3 CCHE as outlined below. If we find a breach in excess of our limits, we will return it to an acceptable configuration within one (1) hour and we will report it in accordance with 10 CFR 50.72 as operation outside the design basis. LER 95-04 will be supplemented to indicate any additional breaches.

Immediate and interim corrective actions include:

1. Personnel have been reminded, by various means, that compliance with this requirement is an important obligation from both a safety and compliance perspective;
2. Operations will add a check of the CCHE integrity to their normal shift rounds;
3. Roving fire watch personnel now check each CCHE door (C101, C301, C503, C508, C701, and C802) to assure their closure approximately every hour;
4. CCHE envelope doors will be inspected on a periodic basis to help assure they retain the ability to perform their design function;
5. A reduction in the use of the most damage-prone doors has been implemented by the locking of Door C301 (preventing ingress without a key but allowing egress), located on Elevation 124' which provides ingress from the Turbine Building to the Control Complex Stairwell. Three of six CCHE doors are locked or otherwise secured to limit/control traffic.;

requirements of the CCHE, thereby enhancing the timeliness of reportability and actions associated with the CCHE;

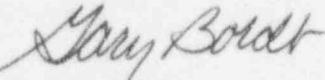
7. Replacement doors are being designed, procured, and installed; and,
8. Additional corrective action recommendations or actions may be developed as applicable.

Additional analytical, configuration, and administrative optional actions being addressed include:

1. Reducing, relocating or eliminating toxic gas sources. This is considered to be a long term option;
2. Refining the analysis to take credit for elevation differences, which are appropriate for a toxic gas heavier than air; and,
3. Elimination of some standard analysis assumptions associated with the radiation source term, potentially taking credit for some recent source term work (NUREG-1465). This effort is also considered to be a long term option.

The efforts outlined above constitute the key items of an appropriate action plan to resolve this issue. FPC management is taking aggressive steps to prevent recurrence of this problem and is confident that improved performance will continue.

Sincerely,



G. L. Boldt.  
Vice President  
Nuclear Production

GLB/KRW/JWT:ff

Attachment

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