

**Florida  
Power**  
CORPORATION

October 3, 1984  
3F1084-04

Mr. Harold R. Denton  
Office of Nuclear Reactor Regulation  
Attn: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

SUBJECT: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
ASME Section XI, Relief Request #100

Dear Mr. Denton:

The current Inservice Inspection program at Crystal River Unit 3 (CR-3) is based on the 1974 Edition through Summer 1975 Addenda of ASME Boiler and Pressure Vessel Code Section XI.

Pursuant to CR-3 Technical Specification 4.0.5.a. and 10 CFR 50.55a(g)(6)(i), Florida Power Corporation (FPC) requests that relief be granted from the inspection requirements of Code Sections IWA, IWB, IWC and IWD, Article 5000, System Hydrostatic Testing, 1974 Edition through Summer 1975 Addenda. FPC proposes to adopt the requirements of Code Sections IWA, IWB, IWC and IWD, Article 5000, System Hydrostatic Testing, 1980 Edition through Winter 1981 Addenda as alternate inspections. The 1980 Edition through Winter 1981 Addenda is currently referenced in 10 CFR 50.55a(b)(2).

As noted in the attached relief request, the 1974 Edition through Summer 1975 Addenda is very restrictive with regard to the media used in the performance of hydrostatic testing to verify pressure boundary integrity. These restrictions would force FPC to perform the testing in a less prudent fashion than is available by using the later code edition, and it is for this reason the relief is requested.

Relief from this requirement will not affect the safe operation of Crystal River Unit 3. The adoption of proposed inspection requirements from a later edition of the code adequately demonstrates that the requirements of 10 CFR 50.55a(g)(6)(i) are met. Since this will dictate the planning efforts for the 1985 refueling outage, your prompt attention to this matter is requested.

Florida Power Corporation has enclosed, per 10 CFR 170, an exemption application fee of one hundred fifty dollars (\$150.00, check #670382).

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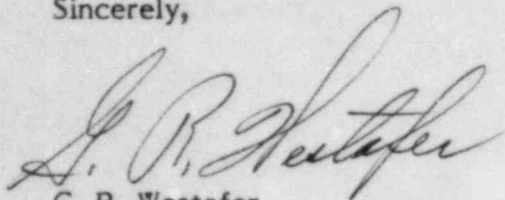
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Additionally, for your information, several other relief requests are currently being developed by Florida Power Corporation which will also affect the testing to be performed during Refuel V. These will be submitted for your review no later than October 31, 1984.

Sincerely,



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

GRW:jel  
Attachments

cc: Mr. J. P. O'Reilly  
Regional Administrator, Region II  
U.S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
101 Marietta St., N.W., Suite 2900  
Atlanta, GA 30323

**FLORIDA POWER CORPORATION  
INSERVICE INSPECTION  
RELIEF REQUEST #100**

Reference Code: ASME Boiler and Pressure Vessel Code, Section XI, 1974 Edition through Summer 1975 Addenda

**I. Component for which exemption is requested:**

Class 1, 2 and 3 piping and associated components.

**II. Reference Code Requirement that has been determined to be impractical:**

Article 5000 of Code Sections IWA, IWB, IWC and IWD, System Hydrostatic Testing, 1974 Edition through Summer 1975 Addenda.

**III. Basis for Requesting Relief:**

The 1974 Edition through Summer 1975 Addenda contains very restrictive requirements in reference to the hydrostatic test program. For example, it does not allow the use of system contained fluid as a pressurizing medium and would require that Florida Power Corporation introduce water into the diesel fuel oil lines for the test. Further, this Edition of the Code makes no allowance for pneumatic tests in lieu of the hydrostatic tests. An example of where this requirement would be impractical is hydrostatic testing of the Reactor Building spray caustic storage tanks. Hydrostatic testing would require flushing of the system prior to the test, which would unnecessarily produce a large volume of chemical waste. However, pneumatic testing would not produce this waste.

**IV. Alternate Examination:**

Florida Power Corporation proposes to adopt Article 5000 of Code Sections IWA, IWB, IWC and IWD of the 1980 Edition through Winter 1981 Addenda, System Hydrostatic Testing. This Edition allows the use of contained media for hydrostatic tests and pneumatic tests.

**V. Implementation Schedule:**

The system hydrostatic tests will be completed at or near the end of the first inspection interval.