

**Florida  
Power**  
CORPORATION

December 14, 1984  
3F1284-11

Mr. H. R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Crystal River Unit 3  
Docket No. 30-302  
Operating License No. DPR-72  
Technical Specification Change Request No. 82, Supplement 4

Dear Sir:

Enclosed are three (3) originals and forty (40) copies of Technical Specification Change Request No. 82, Supplement 4, requesting amendment to Appendix A of Operating License No. DPR-72. As part of this request, proposed replacement pages for Appendix A are enclosed.

As provided for by Generic Letter 83-27, Florida Power Corporation is requesting a change to specific Technical Specifications to allow an extension of seven 18 month surveillance requirements which are to be performed during shutdown. Due to an 85% capacity factor for this cycle and a 90% capacity factor year-to-date, we have been unable to perform all 18 month surveillances required prior to the fuel cycle completion. Therefore, Florida Power Corporation is now facing a shutdown for the sole purpose of accomplishing these surveillances.

Florida Power Corporation anticipated this condition during the licensing of this cycle and requested extension of all 18 month surveillances. The staff denied this encompassing request and issued the above referenced Generic Letter which instructed Licensees to request only specifically needed surveillance extensions.

We are requesting relief for the following equipment:

1. Low Steam Generation Pressure (Steam Line Rupture Matrix)
2. Pressurizer Level (Remote Shutdown)
3. Steam Generator Pressure (Remote Shutdown)

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PDR

*Appl w/check  
#694920*

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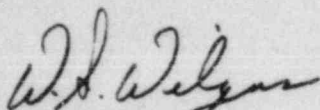
4. Pressurizer Level (Post-Accident)
5. Steam Generator Outlet Pressure (Post-Accident)
6. Startup Feedwater Flow
7. Power Operated Relief Valve

It should be noted that some of these instrument strings will be modified or replaced during Refuel V. Therefore, the calibration will be performed on the new instrumentation.

Florida Power Corporation requests that this Amendment Request be noticed in the Federal Register as soon as possible to allow for timely resolution. Approval by February 1, 1985 (to allow for necessary procedure revisions, reviews, etc.) will support our continued operation past February 14, 1985 which is the most limiting surveillance interval (including the maximum allowable extension of 25% of the surveillance interval).

An amendment application fee of one hundred fifty dollars (\$150), as required by 10CFR170, has been included with this Change Request.

Sincerely,



W.S. Wilgus, Vice President  
Nuclear Operations

PGH/ddl

Enclosures

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

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF )  
 )  
FLORIDA POWER CORPORATION ) DOCKET No. 50-302

CERTIFICATE OF SERVICE

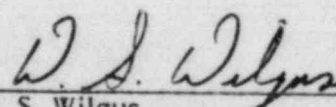
W. S. Wilgus deposes and says that the following has been served on the Designated State Representative and the Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,  
Board of County Commissioners  
of Citrus County  
Citrus County Courthouse  
Inverness, FL 32650

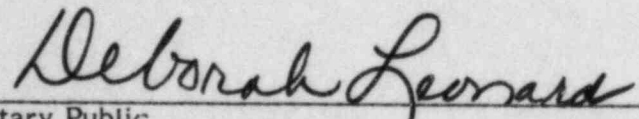
Administrator  
Radiological Health Services  
Department of Health and  
Rehabilitative Services  
1323 Winewood Blvd.  
Tallahassee, FL 32301

A copy of Technical Specification Change Request No. 82, Supplement 4, requesting amendment to Appendix A of Operating Licensing No. DPR-72.

FLORIDA POWER CORPORATION

  
\_\_\_\_\_  
W. S. Wilgus  
Vice President  
Nuclear Operations

SWORN TO AND SUBSCRIBED BEFORE ME THIS 14th day of December, 1984.

  
\_\_\_\_\_  
Notary Public

Notary Public, State of Florida at Large  
My Commission Expires: November 19, 1986

(NOTARIAL SEAL)

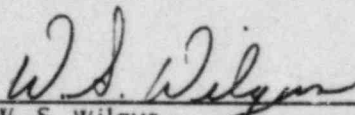




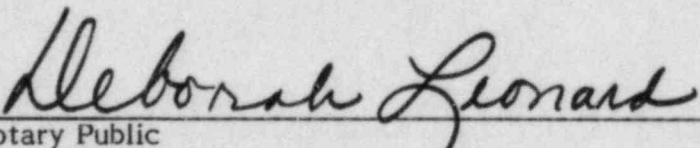
STATE OF FLORIDA

COUNTY OF PINELLAS

W. S. Wilgus states that he is the Vice President, Nuclear Operations for Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
W. S. Wilgus  
Vice President  
Nuclear Operations

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 14th day of December, 1984.

  
\_\_\_\_\_  
Notary Public

Notary Public, State of Florida at Large,

My Commission Expires: November 19, 1986

**FLORIDA POWER CORPORATION  
CRYSTAL RIVER UNIT 3  
DOCKET NO. 50-302/LICENSE NO. DPR-72  
REQUEST NO. 82, SUPPLEMENT NO. 4  
TWO YEAR CYCLE IMPACT**

**LICENSE DOCUMENT INVOLVED:**      Technical Specifications

**PORTIONS:**

3.3.2.1	Engineered Safety Feature Actuation System Instrumentation
3.3.3.5	Remote Shutdown Instrumentation
3.3.3.6	Post-Accident Instrumentation
3.4.3.2	Power-Operated Relief Valve

**DESCRIPTION OF REQUEST:**

This submittal requests that the 18 month calibration frequency requirement for the following Specifications be waived for Cycle V until Refuel V:

4.3.2.1.1(4.b.1)	Steam Line Rupture Matrix, Low Steam Generator Pressure
4.3.3.5(4)	Remote Shutdown Instrument, Pressurizer Level
4.3.3.5(6)	Remote Shutdown Instrument, Steam Generator Pressure
4.3.3.6(7)	Pressurizer Level
4.3.3.6(8)	Steam Generator Outlet Pressure
4.3.3.6(11)	Startup Feedwater Flow
4.4.3.2.1	Power-Operated Relief Valve Calibration

Specifically, the following footnote should apply to the components above:

#The specified 18 month calibration frequency may be waived for Cycle V provided the surveillance is performed during Refuel V.

**REASON FOR REQUEST:**

On March 31, 1983, Florida Power Corporation submitted Technical Specification Change Request No. 82, Attachment D, to the staff requesting an extension of all 18 month frequency surveillances to 24 months. On June 20, 1983, the staff found this change to be unacceptable and specified that the surveillances should be performed, to the extent possible, during mid-cycle outages. Crystal River Unit 3 has operated very well this cycle with only a few, short mid-cycle outages. Because we were unable to perform these surveillances, which require a shutdown, during the cycle, we are requesting an extension to Refuel V.

**EVALUATION OF REQUEST:**

The last time the subject calibrations were performed was late March or early April of 1983. The current interval, including the allowed 25 percent extension, will end in mid-February of 1985 (February 14, 1985). Refuel V is expected to begin on March 9, 1985. Thus, this Change Request will allow operation beyond the allowed interval (22.5 months) for less than one month. Daily, monthly, and quarterly surveillances will continue to be performed. This change will not significantly reduce plant safety.