

# Florida Power

CORPORATION  
Crystal River Unit 3  
Docket No. 50-302

May 26, 1992  
3F0592-11

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

Subject: Bulletin 88-08: Thermal Stresses in Piping  
Connected to Reactor Coolant Systems

References: A. NRC to FPC letter, dated February 6, 1992 (3N0292-01)  
B. FPC to NRC letter, dated August 30, 1988 (3F0888-21)  
C. FPC to NRC letter, dated September 13, 1989 (3F0989-07)

Dear Sir:

Florida Power Corporation (FPC) has reviewed the NRC's assessment of our responses to the subject bulletin (Reference A) and has discussed it extensively with our Project Manager and other members of the NRC staff. The letter and discussions indicated the NRC did not understand FPC's actions with regard to Bulletin 88-08 and its Supplements. This letter will restate FPC's actions and requests the NRC to re-review our disposition of the bulletin's recommendations.

Bulletin 88-08 noted the potential for thermal stratification induced damage to unisolable portions of the RCS due to leakage past various interfaces with other systems. The initial bulletin focused on a 1987 event at Farley associated with the normal charging system. The supplements generally expanded the concern to other interfaces. Crystal River Unit 3 (CR-3) had an event in 1982 which was similar to the Farley event. As a result of our event, we had taken extensive corrective actions long before Bulletin 88-08 was issued. FPC's first response (Reference B) was almost completely a review of our past corrective actions in the context of the suggested actions in the bulletin. In doing so however, we failed to explicitly state that we had reviewed the RCS interfaces for the potential for thermal stratification. In fact, we had extensively reviewed similar configurations to the NRC staff's satisfaction 6 years before the publication of the bulletin as part of our follow-up to the 1982 event. We did not re-review the interfaces in response to the bulletin or its first two supplements. When Supplement 3 came out, FPC noted that the scope had expanded past that of our previous work and, therefore, we conducted a complete review of RCS interfaces against objective criteria that we communicated to the staff in our second response (Reference C). FPC concluded that the potential for adverse

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thermal effects remained limited to the high pressure injection/make-up (MU/HPI) lines. These reviews satisfied Action Item 1 of the Bulletin.

Action Item 2 of the Bulletin would have required an interim nondestructive examination of potentially affected interfaces. This was never relevant for CR-3.

The corrective action for the 1982 event at CR-3 was to modify the MU/HPI lines by moving the check valves, which isolate the MU/HPI from the RCS, farther from the nozzle/safe-end region which had experienced the failure. The piping arrangement was thoroughly instrumented, monitored, and analyzed to demonstrate the fatigue life of the new configuration. Additionally, the thermal sleeves associated with this nozzle were modified (lengthened) and re-rolled. To assure that this rolled sleeve did not loosen, the CR-3 ISI program was augmented to periodically check this interface. These actions are consistent with Action Item 3.

Action Item 4 dealt with the scheduling of the various Action Items and was never relevant for CR-3 since there were no actions for us.

Reference A reflects rather negatively on FPC's actions based on the misunderstanding of our response. Therefore, FPC requests that it be withdrawn and that our responses in References B and C be reviewed in light of the summary provided above.

We are confident that we have taken appropriate actions which are responsive to the Bulletin and all of its Supplements. Most of these actions were taken based on FPC's management of the resolution of our own experience rather than in response to the Bulletin. It is FPC's practice to explicitly state in our response when we do not plan on following the recommendations of generic communications. Thus, when we have not taken exception to a bulletin, generic letter, or similar correspondence and the Staff's review indicates that our actions are not acceptable, we would appreciate the opportunity to discuss our position before a negative review is placed on the docket. In this instance, a simple teleconference or meeting could have resolved FPC's position more effectively.

Sincerely,



P. M. Beard, Jr.  
Senior Vice President  
Nuclear Operations

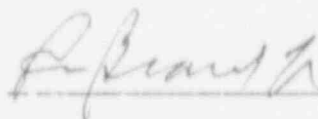
PMB/KRW/JWT

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

STATE OF FLORIDA

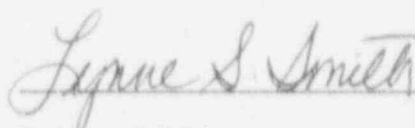
COUNTY OF CITRUS

P. M. Beard, Jr. states that he is the Senior 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.



P. M. Beard, Jr.  
Senior Vice President  
Nuclear Operations

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 26th day of May, 1992.



Notary Public

Notary Public, State of Florida at Large,

Notary Public, State of Florida at Large

My Commission Expires

My Commission Expires, Oct. 18, 1995  
~~Bonded thru Agent's Notary Brokerage~~