

**Florida  
Power**  
CORPORATION

Crystal River Unit 3  
Docket No. 50-302

50-302

June 10, 1992  
3F0692-13

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: Request for Temporary Waiver of Compliance

Florida Power Corporation, Crystal River Unit 3, is presently in a Refueling Outage. In order to minimize outage duration, steam generator activities have been scheduled parallel to refueling activities. Compressed air is needed as it will be used as a breathing air supply and for support of robotics associated with steam generator tube plugging.

Technical Specification 3.9.4, Refueling Operations, Containment Penetrations, requires each penetration providing direct access from the containment atmosphere to the outside atmosphere be either 1) closed by an isolation valve, blind flange, or manual valve, or 2) be capable of being closed by an operable automatic containment purge and exhaust isolation valve. This Specification, as written, prohibits opening of the Station Air Valves during refueling activities since the LCO applicability is during core alterations or movement of irradiated fuel within the containment.

A temporary waiver of compliance is requested for Specification 3.9.4 which would allow administrative controls be utilized for station air valves and temporary connection air valves. The administrative controls would consist of a dedicated operator stationed at the valve, who would be assigned responsibility of closing the valve when requested to do so by the control room.

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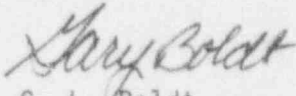
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It is requested that this temporary waiver of compliance be granted for a period not to exceed seven days of cumulative core alteration and fuel movement time in the reactor building.

Attachment 1 to this letter details the justification for this requested temporary waiver of compliance.

Sincerely,



G. L. Boldt  
Vice President, Nuclear Production

Attachment

xc: G. C. Lainas, Assistant Director for Region II Reactors  
Regional Administrator, Region II  
Senior Resident Inspector

ATTACHMENT 1  
TEMPORARY WAIVER OF COMPLIANCE  
CONTAINMENT PENETRATIONS

- 1) Discussion of the requirements for which the temporary waiver of compliance is requested:

Crystal River Unit 3 (CR-3) Technical Specification 3.9.4, Refueling Operations - Containment Penetrations, states that each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:

- Closed by an isolation valve, blind flange, or manual valve, or
- Be capable of being closed by an OPERABLE automatic containment purge and exhaust isolation valve

during CORE ALTERATIONS or movement of irradiated fuel within the containment.

CR-3 Technical Specification 3.6.1.1, Containment Integrity, and Specification 3.6.3.1, Containment Isolation Valves, include provisions for exercising administrative control over manual isolation valves.

A temporary waiver of compliance is requested for current CR-3 Specification 3.9.4 which would allow administrative control of station air valves and temporary connection air valves that are used for building isolation.

- 2) Discussion of the circumstances surrounding the situation including the need for prompt action, and a description of why the situation was not avoided:

The scope of the steam generator tube inspection expanded due to finding several tubes with greater than 60% through-wall indication. As a result, all tubes not previously inspected are included in the current schedule. The increased effort translated into a longer schedule for steam generator work, which required the steam generator work to overlap with refueling activities. Station air and temporary connected air are required to perform the steam generator tube plugging work and, therefore, may impact critical path for startup from Refuel 8. Compressed air is used as a breathing air supply and for support of robotics associated with the steam generator tube plugging.

2) (Continued)

As a result of an increased sensitivity regarding shutdown risks, CR-3 has developed a heightened awareness which lead to identifying a potential concern in the area of the containment penetrations for compressed air.

3) A discussion of compensatory measures:

This waiver of compliance will allow for compensatory measures for operators to perform manual isolation of reactor building penetrations in lieu of an automatic function. Dedicated individuals will be assigned the single responsibility of closing the appropriate air isolation valves upon control room orders. These individuals will be in direct communication with the control room at all times.

4) A preliminary evaluation of the safety significance and potential consequences of the proposed request:

In order for a direct reactor building (RB) atmosphere to outside atmosphere path to exist the following conditions must exist:

1. An open line to the RB atmosphere must exist, and
2. An open line to outside atmosphere must exist, and
3. Air pressure must degrade to less than RB atmosphere.

Normal air system configuration is such that it is a closed pressurized system with supply lines provided to specific components such as breathing air stations and air powered tools. When properly operated, these devices minimize the potential for creating a direct path from the containment atmosphere to outside atmosphere.

Therefore, there is no reduction in safety or increase in potential consequences of utilizing this temporary waiver, since administrative controls are used in lieu of automatic actuation.

5) Duration of Request:

This temporary waiver of compliance is requested for a period not to exceed seven days of cumulative core alteration and fuel movement time in the reactor building.

- 6) The basis for the licensee's conclusion that the request does not involve a significant hazards consideration:

This request does not involve a significant hazards consideration since the use of administrative controls for specific RB isolation valves is consistent with the requirements established in Technical Specifications 3.6.1.1, Containment Integrity, and 3.6.3.1, Containment Isolation Valves.

Operation of the facility in accordance with the requested action would not involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated.

The probability of occurrence for an accident requiring building isolation is not affected.

The probability of increasing the consequences associated with any accident or event requiring building isolation, atmosphere to atmosphere, is not increased because:

1. Normal configuration and operation of air systems does not provide a direct path from RB atmosphere to outside atmosphere, and
2. Stationing a dedicated individual at the isolation valves ensures immediate closure.

Operation of the facility as proposed would not create the possibility of a new or different kind of accident than was previously evaluated. Assurance of immediate valve closure is maintained by requiring a dedicated individual stationed at the valve who is in continuous communication with the control room.

Operation of the facility in accordance with the requested waiver would not involve a reduction in the margin of safety. Containment isolation is assured through the use of a dedicated individual to provide the isolation function in the event of an accident requiring isolation of the affected penetrations.



- 7) The basis for the Licensee's conclusion that the request does not involve irreversible environmental consequences:

This request involves establishing a temporary administrative control over the isolation of reactor building penetrations which supply compressed air to the reactor building during refueling operations. The controls provided will assure reactor building isolation can be quickly accomplished to prevent direct access from the containment atmosphere to the environment. Therefore, no increase in the amounts, and no change in the types of any effluents that could be released off site will result from the implementation of this request, and no increase in individual or cumulative occupational radiation exposure will occur.

- 8) Confirmation that the actions by the licensee have been reviewed and approved by the Plant Review Committee:

The action requested in this temporary waiver of compliance was reviewed and accepted by the Plant Review Committee on June 10, 1992, Meeting No. 92-24, Item No. 892. There were no significant comments or concerns regarding this request.