



Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 56-302

November 4, 1992
3F1192-01

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

Subject: Technical Specification Administrative Controls

References: A. FPC to NRC letter, 3F0887-07, dated August 10, 1987
B. NRC to FPC letter, 3N0588-27, dated May 25, 1988
C. NRC Memorandum from C. I. Grimes dated December 20, 1991

Dear Sir:

Florida Power Corporation (FPC) filed an exemption request (Reference A) on August 10, 1987 which addressed 10 CFR 50.36. In particular, it requested the NRC to allow the relocation of certain administrative requirements currently contained in facility Technical Specifications which duplicate other regulatory requirements or license conditions (plans covered under 10 CFR 50.54). The NRC, in Reference B, deferred consideration of this request pending consideration in the generic Technical Specification Improvement effort. However, the generic activities focussed on the more technical aspects of STS content. In December 1991 (Reference C), the NRC (Dr. Murley, Bill Russell, et al) and Industry executives considered the inclusion of this request in the ongoing improvement effort. While both the NRC and Industry executives recognized the validity of this effort, it was determined that such efforts should be deferred until a later phase of the program.

It was recognized that FPC was one of the lead plants in implementing the overall Improved Technical Specifications (ITS) and therefore, would have an opportunity to readdress the issue during plant specific implementation. FPC has elected to do so and thereby, act as the lead plant in redefining the content of the Administrative Controls Chapter. It is our understanding that the NRC would consider a broader implementation for other lead or follow-on plants.

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FPC is now in the process of finalizing Crystal River Unit 3's plant-specific specifications based on NUREG 1430. As part of this effort, we wish to begin actual discussions on the proper scope of the Administrative Controls chapter. Attachment 1 is a markup of the Administrative Controls Chapter Table of Contents noting which sections FPC proposes to relocate. It is requested that this proposal be the subject of a meeting between FPC and appropriate NRC review branches at a mutually convenient opportunity in the near future.

Please note FPC recognizes that since the new STS require some content be retained in the Administrative Control Chapter, an exemption to 10 CFR 50.36 is no longer required. The results of our discussions can simply be factored into the CR-3 Lead Plant Technical Specifications that we will be finalizing in 1992-1993.

Sincerely,

P. M. Beard, Jr. for

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

PMB:jbc
Attachment

xc: Regional Administrator
Project Manager
Senior Resident Inspector