

JUN 06 1985

DMB-016

Docket No. 50-302

DISTRIBUTION

~~Docket File~~

NRC PDR

L PDR

ORB#4 Rdg

HThompson

OELD

EJordan

JPartlow

ACRS-10

RIngram

HSilver

Gray File

EBrach

HOornstein

LRubenstein

Mr. Walter S. Wilgus
Vice President, Nuclear Operations
Florida Power Corporation
ATTN: Manager, Nuclear Licensing
& Fuel Management
P. O. Box 14042; M.A.C. H-2
St. Petersburg, Florida 33733

Dear Mr. Wilgus:

By letter dated August 31, 1984, you proposed delay of installation of the portion of the reactor coolant system water level instrumentation which connects to the reactor vessel head (reactor vessel head level trend system, or RVHLTS) until Refuel VI rather than Refuel V as previously committed, based on utilization of manpower and financial resources during Refuel V. In our letter dated October 10, 1984, we confirmed our previous verbal request for additional justification for this change.

Your letter of February 1, 1985 stated that the purpose of the proposed delay is to provide additional time for dialogue with NRC regarding the value of the RVHLTS and whether it should be installed at all. You based your substantive argument primarily on the results of the Once Through Integral Systems (OTIS) tests performed in April and May of 1984, and concluded that the upper head level trending system is no longer needed since it has been demonstrated that hot leg gases can be removed and natural circulation cooling can be established by opening the high point vents on indication that the fuel clad temperature has reached 1400°F. You also point out that an upper head bubble will not interfere with core cooling and that the subcooling margin based on core exit temperature will be a more reliable and earlier indicator for core cooling protection. The lack of accuracy of the upper head system is cited as a potential source of confusion to the operator. Negative safety effects and expense associated with the upper head system are also cited.

While some of your arguments have merit, they fail to recognize other considerations developed during the initial review, e.g., the purpose of the upper head inventory trending monitor is for indication of the approach to inadequate core cooling (core uncovering) and for monitoring the effectiveness of recovery operations such as emergency coolant injection or the cited venting operations. Under many circumstances, the upper head instrumentation will provide an earlier indication of coolant loss than the subcooling margin instrumentation. Operators should be trained regarding the accuracy of the instrument - the measurement is intended to trend coolant inventory, not to measure the level. Other adverse factors cited are not new information.

8506180181 850606
PDR ADOCK 05000302
P PDR

Mr. Wilgus

-2-

In summation, while you have cited new test data to support your position, we see no unexpected results or new information that would bear directly on the arguments already considered during the Commission review which led to issuance of the December 10, 1982 Order for FPC to install a coolant inventory trending system.


Therefore, we do not concur with your requested deferral of installation of the RVHLTS. It is our understanding that you are presently proceeding with the installation of this system and that the installation will be complete by the end of the current refueling shutdown.

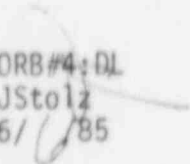
Sincerely,

***ORIGINAL SIGNED BY
JOHN F. STOLZ***

John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

cc: See next page


ORB#4:DL
HSilver;cr
6/6/85


ORB#4:DL
JStolz
6/6/85

Mr. W. S. Wilgus
Florida Power Corporation

Crystal River Unit No. 3 Nuclear
Generating Plant

cc:

Mr. R. W. Neiser
Senior Vice President
and General Counsel
Florida Power Corporation
P. O. Box 14042
St Petersburg, Florida 33733

Bureau of Intergovernmental Relations
660 Apalachee Parkway
Tallahassee, Florida 32304

Mr. Wilbur Langely, Chairman
Board of County Commissioners
Citrus County
Inverness, Florida 36250

Nuclear Plant Manager
Florida Power Corporation
P. O. Box 219
Crystal River, Florida 32629

Mr. Robert B. Borsum
Babcock & Wilcox
Nuclear Power Generation Division
Suite 220, 7910 Woodmont Avenue
Bethesda, Maryland 20814

Mr. Tom Stetka, Resident Inspector
U.S. Nuclear Regulatory Commission
Route #3, Box 171
Crystal River, Florida 32629

Dr. J. Nelson Grace, Regional Administrator
U.S. Nuclear Regulatory Commission, Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Mr. Uray Clark, Administrator
Radiological Health Services
Department of Health and
Rehabilitative Services
1323 Winewood Blvd.
Tallahassee, Florida 32301

Administrator
Department of Environmental Regulation
Power Plant Siting Section
State of Florida
2600 Blair Stone Road
Tallahassee, Florida 32301

Attorney General
Department of Legal Affairs
The Capitol
Tallahassee, Florida 32304