

**Florida
Power**
CORPORATION

June 6, 1985
3F0685-03

Director of Nuclear Reactor Regulation
Attention: Mr. Hugh L. Thompson Jr., Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington DC 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Potential Licensing Delays Affecting the CR-3 Restart

Dear Sir:

In February of 1985, representatives of Florida Power Corporation (FPC) met with you and members of your staff to discuss the status of Licensing issues affecting the Crystal River plant. The meeting was followed by a March 7th letter to Mr. John Stolz (copy attached) itemizing the open issues and the priority of those issues based on the restart requirements from our refueling outage which began on March 9, 1985. Of the 35 issues listed, the majority are required for restart, yet only two have been resolved and docketed by the NRC. We believe FPC has been very responsive in providing the NRC with information to get the issues resolved, but FPC has a major concern that the lack of NRC closure concerning many of the issues, along with the pre-noticing requirements of the Scholly Amendment will impact the heatup and startup of Crystal River Unit 3 (CR-3).

Many of the proposed Technical Specification changes and exemption requests will take effect as we enter Mode 4 during heatup. Our present schedule shows the approximate date for entering Mode 4 as July 15, 1985. This means that final pre-noticing of these items must occur within the next few days. Our attempts to expedite these items through meetings and phone calls have not produced the desired results. FPC requests your personal involvement in order to provide the necessary NRC resources and direction for resolving these startup related submittals.

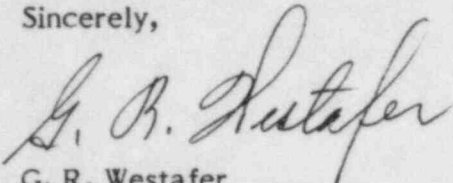
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3F0685-03
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Should you have any questions, please contact my office.

Sincerely,



G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

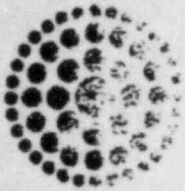
GRW/feb

Attachment

cc: Mr. Gus Lainas
Assistant Director for Operating Reactors
Operating Reactors Branch #4
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Project Manager
Mr. Harley Silver
Operating Reactors Branch #4
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555



**Florida
Power**
CORPORATION

March 7, 1985
3F0385-07

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
FPC Issues Schedule

Dear Sir:

As discussed in the meeting on February 21, 1985, between yourself, Mr. Harley Silver of your staff, and Messrs. R. M. Bright and K. R. Wilson of my staff, attached is an itemized list of issues of which Florida Power Corporation (FPC) requests resolution. This list is provided to facilitate your prioritization of the necessary manpower to meet the needed approval dates.

We recognize that the list is subject to change and will revise it as necessary. A weekly teleconference is proposed to review the list for recent changes and to identify near-term priorities. A monthly meeting is also proposed to review the total list and discuss strategy for upcoming items.

The list contains two footnotes which require further explanation:

- (1) The single asterisks are provided to identify those items which have 10 CFR 50.59 concerns. Several modifications are being worked in response to rules, orders, etc. which would require prior NRC approval due to elimination of requirements currently in the technical specifications. Appropriate change requests under 10 CFR 50.90 have been provided as indicated. We intend to proceed with the modifications upon entry into the non-applicable mode for the associated equipment and have requested approval of the license amendments prior to entry into the new equipments proposed applicable mode. If this is inconsistent with the Staff's application of 10 CFR 50.59(a)(1)(i), please inform us immediately of the alternative you require.

8503120257
BR

March 7, 1985

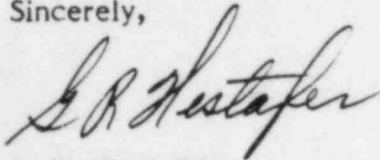
3F0385-07

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- (2) The double asterisks highlight those items we believe require a meeting in the immediate future. We request that you evaluate the need for such meeting from the Staff's perspective and that you identify a proposed schedule.

We would appreciate your supplying the following information for all items that we will add to the list for our mutual benefit: missing tac numbers, responsible review branch(es), reviewer(s) (where direct interface with your prior approval might be beneficial), noticing status, and any additional information you may think would help us understand the status or you would like from FPC.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. R. Westafer".

G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

RMB/feb

REFUEL & MAR TECHNICAL SPECIFICATIONS

<u>TAC NUMBER</u>	<u>SUBMITTED</u>	<u>IDENTIFICATION/DESCRIPTION</u>	<u>PRIORITY/ REQ'D BY</u>	<u>BASIS FOR PRIORITY</u>
N/A	N/A	TSCRN xxx ES Actuation Tests. Resolve over pressurization potential during plant integrated test and HPI flow balancing test.	Prior to Mode 4	
N/A	01/23/85	TSCRN 122 EFW Initiation & Control provides operability and surveillance requirements for the new system and replaces current rupture matrix requirements.	Prior to Mode 4	Refuel V MAR
	02/02/85	TSCRN 131 Recombiner Capability delegates six containment isolation valves, adds eight new ones.	*Prior to Mode 4	Refuel V MAR
M56096	08/30/84	TSCRN 124 Remote shutdown replaces old equipment being removed with new equipment.	*Prior to Mode 3	Refuel V MAR
	April	TSCRN xxx Reload Report	Prior to Mode 2	Refuel V MAR
	02/27/85	TSCRN 130 Fire Service System correct Technical Specifications for Appendix R Modifications	*Prior to Mode 4	Refuel V MAR

*See Cover Letter

POTENTIAL PROBLEM AREAS

<u>TAC NUMBER</u>	<u>SUBMITTED</u>	<u>IDENTIFICATION/DESCRIPTION</u>	<u>PRIORITY/ REQ'D BY</u>	<u>BASIS FOR PRIORITY</u>
M56093	09/28/84	TSCRN 127 RETS Clarifications revising O ₂ H ₂ monitor action statement to allow continued operation.	High	Potential to cause a S/D if O ₂ H ₂ monitor inoperable.
M54892	04/23/84	TSCRN 110 Operation of Cont. Iso. Valves allows operating certain valves otherwise required to be isolated.	High	Potential to cause S/U delay.
	02/14/85	TSCRN 126 RCS Press/Temp limits of 8 EFPY and schedule.	Startup +85 EFPD	Current curves only go to 5 EFPY.
M55176	05/31/84	TSCRN 120 3.0.4 Applicability	Moderate	Potential to cause S/U delay.
M56094	07/25/84	TSCRN 123 Cable tunnel sump pump, removes requirement for pump.	Low	Waste of manpower-LEs.
	07/25/84	TSCRN 103, Rev. 2 Administrative Controls revise Specifications to be consistent with current organization.	Moderate	So Tech Specs match organization.
	11/18/81	TSCRN 83 RCS controlled leak rate correct Technical Specifications to reflect continued leak rate of 32 GPM.	High	NRC omission from Refuel IV Restart package
M56095	08/30/84	TSCRN 92 Seismic instrumentation correct Technical Specifications to exempt head seismic instrumentation from operability requirements.	Low	So Tech Specs reflect actual use.
	01/24/85	TSCRN 129 ES Corrections correct Technical Specifications to reference appropriate response time and functional units.	Moderate	So Tech Specs match installed system.

POTENTIAL PROBLEM AREAS

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M54445	11/09/84	TSCRN 125 DH removal flow requirements. Clarify Technical Specifications to be consistent with verbal NRC interpretation.	Low	With NRC concurrence verbal, simply a house-keeping change.
M55825	12/19/84	TSCRN 121 Auxiliary Bldg. Ventilation provide time restrictions for removing complete system from operation for maintenance.	Moderate	So maintenance can be performed on system.
	02/26/85	10 CFR 20.203 (f) Labeling Interpretation a. Verbal concurrence b. Formal concurrence	ASAP	We plan to utilize during shutdown for Refuel V.
	02/21/85	CR-3 GDC-4 Partial exemption (technical report)	**October, 1985	To allow procurement of new snubbers
M56092	10/03/84	Relief Request #100 - Relief to allow the use of the 1980 ASME Code requirements for hydrostatic testing. a. Verbal b. Formal	Complete Restart	Needed for ISI just prior to and during outage.
M56092	10/31/84	Relief Request #110 - Relief requested from volumetric examination requirements of 10% of the peripheral control rod drive mechanism housing welds. a. Verbal b. Formal	ASAP Restart	Needed for ISI during the outage.

**See Cover Letter

POTENTIAL PROBLEM AREAS

<u>TAC NUMBER</u>	<u>SUBMITTED</u>	<u>IDENTIFICATION/DESCRIPTION</u>	<u>PRIORITY/ REQ'D BY</u>	<u>BASIS FOR PRIORITY</u>
M56092	10/31/84	Relief Request #120 - Relief requested from the requirement to hydrostatically test the chilled water header. a. Verbal b. Formal	ASAP Restart	Needed for ISI during the outage.
M56092	10/31/84	Relief Request #130 - Relief requested from the requirement to perform visual and volumetric examinations of the RCP casing welds and interior surfaces. a. Verbal b. Formal	ASAP Restart	Needed for ISI during the outage.
M56092	10/31/84	Relief Request #140 - Relief requested from the requirement to volumetrically examine the reactor vessel support skirt. a. Verbal b. Formal	ASAP Restart	Needed for ISI during the outage.
M56092	10/31/84	Relief Request #140 - Relief requested from the requirement to perform surface examinations of the core flood nozzle to-safe and safe end-to-pipe welds a. Verbal b. Formal	ASAP Restart	Needed for ISI during the outage.
MD4549	10/31/84	IST (Pump and Valve Testing), NRC concerns addressed in responses to their questions. Awaiting action by NRC which is to set up meeting to resolve any remaining concerns.	**Prior to Startup	Needed to comply with Technical Specification 4.0.5.
M54798	04/12/84	Change pump inservice testing from monthly to quarterly.	Startup	Reduce manpower and pump wear.

SAME
ITEM?

**See Cover Letter

POTENTIAL PROBLEM AREAS

<u>TAC NUMBER</u>	<u>SUBMITTED</u>	<u>IDENTIFICATION/DESCRIPTION</u>	<u>PRIORITY/ REQ'D BY</u>	<u>BASIS FOR PRIORITY</u>
M42512	N/A	Environmental qualification (10 CFR 50.49) a. Concurrence with treatment of RG 1.97 b. Scheduler Relief on March 31, 1985 1. Verbal 2. Formal	Startup Complete 03/31/85	FPC could be viewed in violation of law otherwise. NRC addressing generically FPC will be in violation of rule on this date.
M55950	09/24/84	Technical Exceptions to (Appendix R) a. Initial Verbal b. Revised submittal by FPC c. Reconfirmed verbal (change in reviewers) d. Formal approval	Complete Complete ASAP TED-NRC	12/11/84 Extremely substantial outage impact ID plant specific schedule
M55950 (?)	10/05/84	Appendix R - Scheduler Exemptions a. Verbal on original package b. Verbal on revised package c. Formal Approval	Complete ASAP TED-NRC	Extremely substantial outage and financial impact. NRC (per GL 85-01) to ID plant specific schedule.
M45124	02/01/85	NUREG-0737, Item II.F.2.3 Inadequate Core Cooling Instrumentation Head Portion Exemption	03/15/85	To be able to install the head portion of the ICC during Refuel V if the extension is not granted.
M56196	10/22/84	RV Head Vent Exemption	03/31/85	To be able to answer Generic Letter 81-14, "Natural Circulation Cooldown" in a timely manner to close it out.

POTENTIAL PROBLEM AREAS

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N/A	02/27/85	DCRDR Report, Delay	03/15/85	To include comments of the DCRDR audit team as published in their report - lead time needed so that a report can be submitted by April 3, 1985 as presently ordered.
M49668	02/27/85	Reactor Coolant Pump Trip	06/01/85	So that procedures can be changed to implement the new RC Pump Trip criteria.
M56091	10/04/84	High Energy Lines for Blowdown of OTSG		FPC has been requested to furnish additional information.