

**Florida
Power**
CORPORATION

May 24, 1985
3F0585-18

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Technical Specification Change Request No. 130, Rev. 1

Dear Sir:

Florida Power Corporation (FPC) hereby submits the enclosed three (3) originals and forty (40) copies of Technical Specification Change Request No. 130, Rev. 1, requesting amendment to Appendix A of Operating License No. DPR-72. As part of this request, the proposed replacement pages for Appendix A are enclosed.

This submittal requests that the tables of fire detection instrumentation, deluge and sprinkler systems, and fire hose stations be transferred from the Technical Specifications to the Crystal River Unit 3 Fire Protection Plan. In addition, a license condition is proposed to control changes to the Fire Protection Plan. With this submittal, we are withdrawing the request included in Revision 0 that would have amended action (a.) of Specification 3.7.11.4.

The Crystal River Unit 3 Fire Protection Plan (The Plan) provides the overall description of the fire protection program for the plant. The Plan is written in accordance with 10 CFR 50.48(a) and identifies the staff positions responsible for implementation of the program, specifies the administrative controls and policies to prevent fires or limit their severity, specifies the training requirements for general employees and fire brigade members. The Plan describes the features employed to limit fire damage and protect safe shutdown capability (i.e., manual and automatic fire detection and suppression systems as installed per Appendix R). The Plan also contains a description of the Quality Assurance requirements and controls which assure continued effectiveness of the implementation and control of the program.

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Documents which support and implement The Plan which are not specifically a part of The Plan are:

- a) The CR-3 Fire Hazards Analysis,
- b) 10 CFR 50, Appendix R, Fire Study-Analysis of Safe Shutdown Capability,
- c) Remote Shutdown Systems Description, and
- d) CR-3 Implementing Procedures.

These documents contain the analysis, design, and implementation details of the program features described in The Plan.

Pursuant to the telephone conference between members of the NRC Staff and FPC Licensing on May 15, 1985, FPC provides the following commitments.

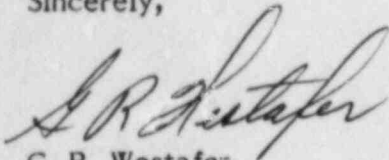
- 1) The Crystal River Unit 3 Fire Protection Plan will contain, in addition to the 10 CFR 50.48(a) requirements described above, all administrative controls previously provided via submittals dated June 22, July 11, and December 19, 1977, May 30 and June 23, 1978, January 9 and 26, February 14 and 27, and April 5, 1979. The Plan will also contain administrative controls specified in your safety evaluation report supporting License Amendment No. 23 dated July 27, 1979 and Fire Protection Safety Evaluation Report Supplement No. 1 of October 14, 1980. These controls represent the BTP-9.5-1, Appendix A program of fire protection previously accepted for CR-3 by the NRC staff.
- 2) FPC will provide the NRC staff with a copy of the Fire Protection Plan prior to startup for Cycle 6. FPC will provide a certification under oath and affirmation that The Plan contains the administrative controls referenced above.
- 3) The Plan will clearly and specifically identify the fire detectors, fire suppression systems and fire hose stations provided for protection of safe shutdown capability to which the fire protection Technical Specifications apply. Examples of The Plan sections which identify Technical Specification equipment will be provided for your information prior to start-up.

Florida Power Corporation requests approval of this change request prior to Mode IV operation currently scheduled during July. In conjunction with this request, please notify FPC of the effective date of this change in advance in order to support timely implementation of the change.

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An amendment application fee, check number 721937, of one hundred fifty dollars (\$150), as required by 10 CFR 170, was previously included with the original Change Request submitted on February 17, 1985.

Sincerely,



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

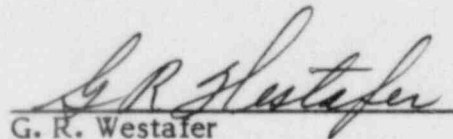
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Enclosures

cc: Dr. J. Nelson Grace
Regional Administrator, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 2900
Atlanta, GA 30323

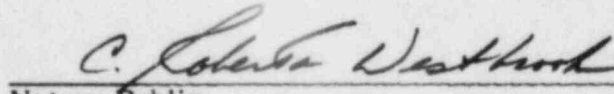
STATE OF FLORIDA
COUNTY OF PINELLAS

G. R. Westafer states that he is the Manager, Nuclear Operations Licensing and Fuel Management 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.



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

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 24th day of May, 1985.



Notary Public

Notary Public, State of Florida at Large,
My Commission Expires: June 10, 1986

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF)

FLORIDA POWER CORPORATION)

DOCKET No. 50-302

CERTIFICATE OF SERVICE

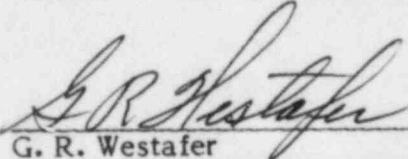
G. R. Westafer deposes and says that the following has been served on the Designated State Representative and the Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,
Board of County Commissioners
of Citrus County
Citrus County Courthouse
Inverness, FL 32650

Administrator
Radiological Health Services
Department of Health and
Rehabilitative Services
1323 Winewood Blvd.
Tallahassee, FL 32301

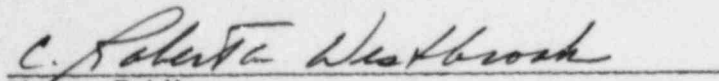
A copy of Technical Specification Change Request No. 130 requesting amendment to Appendix A of Operating Licensing No. DPR-72.

FLORIDA POWER CORPORATION



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

SWORN TO AND SUBSCRIBED BEFORE ME THIS 24th DAY OF MAY 1985.


Notary Public

Notary Public, State of Florida at Large
My Commission Expires: June 10, 1986

(NOTARIAL SEAL)

FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72
REQUEST NO. 130, REVISION 1
FIRE SERVICE SYSTEM TECHNICAL SPECIFICATIONS

LICENSE DOCUMENT INVOLVED: Technical Specifications and Crystal River Unit 3
Nuclear Generating Plant Facility Operating License

PORION:	3.3.3.7	Fire Detection Instrumentation
	3.7.11.2	Deluge and Sprinkler Systems
	3.7.11.4	Fire Hose Stations

DESCRIPTION OF REQUEST:

This submittal requests that the tables of fire detection instrumentation, deluge and sprinkler system, and fire hose stations be moved from the Technical Specifications to the Crystal River Unit 3 Fire Protection Plan. A license condition is proposed to control changes to the Fire Protection Plan.

REASON FOR REQUEST:

This change will allow timely implementation of the limiting condition for operation for additional and revised detection and suppression systems. These systems are being added to or modified by 10 CFR 50 Appendix R. Currently, Florida Power Corporation expects the final designation of the new and modified fire protection equipment by the end of Refuel V. Since final designation is necessary in order to update current Technical Specification pages, very little time will be available to process a Technical Specification change within the NRC. By deleting these tables from the Technical Specification, formal amendment processing at the last minute is avoided. If these tables are not deleted or revised, the Technical Specifications will be inaccurate due to these Appendix R modifications.

EVALUATION OF REQUEST:

While this change may decrease the degree of control to which the tables currently are subject, the new level of control will be appropriate for this type of equipment. Controls include:

1. The proposed license condition.
2. Specification 6.8.1 requires the maintenance of a Fire Protection Program Plan.
3. Changes to the Plan, and hence the subject tables require a Plant Review Committee and Nuclear Plant Manager Review prior to implementation.
4. The Plan is periodically audited pursuant to Specification 6.1.3 and 6.5.2.9.g.

This Plan is readily available to NRC Inspectors for comment and enforcement. Additionally, changes in the detection and suppression systems such as location, type, etc., would be changes to the facility, such changes will be subject to the provisions of 10 CFR 50.59.

FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72
REQUEST NO. 130, REVISION 1
SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

DESCRIPTION OF REQUEST:

To comply with the requirements of 10 CFR 50.48 and Appendix R, Florida Power Corporation is modifying the facility fire protection features. These modifications affect equipment described in the Technical Specifications for Fire Detection Instruments, Deluge and Sprinkler Systems, and Fire Hose Stations to the extent that the Technical Specifications will not be correct. To resolve this, the Amendment moves the equipment lists for the above fire protection features from the Technical Specifications to the Fire Protection Plan where the lists can be updated in a timely manner. This Amendment also proposes a License Condition which specifies when and how changes can be made to the Fire Protection Plan.

BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION:

The Commission has provided guidance concerning the application of the standards for making a no significant hazards consideration determination by providing certain examples (48 FR 14870). The example that the proposed Amendment fits is: "(vii) A change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations." The Commission revised 10 CFR 50.48 and Appendix R on November 19, 1980 to become effective on February 17, 1981. These regulations revised the requirements for fire protection features. The changes proposed herein correct the Technical Specifications such that the license conforms to the changes in 10 CFR 50.48 and Appendix R. For this reason, we have determined that this Amendment involves no significant hazards consideration.