

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 96-382

September 23, 1996
3F0996-14

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

Subject: Technical Specification Change Request No. 206, Revision 0
Engineered Safeguards Actuation System Automatic Actuation Logic

Dear Sir:

Florida Power Corporation (FPC) hereby submits Technical Specification Change Request No. (TSCRN) 206 requesting amendment to Operating License No. DPR-72. This change request deletes a note for the Surveillance Requirement for the Engineered Safeguard Actuation System Automatic Actuation Logic. This change is necessary because the existing note is not appropriate for the conditions that exist during the test.

Revised basis pages are also included.

Sincerely,

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

Attachments

PMB:AEF

xc: Regional Administrator, Region II
Senior Resident Inspector
NRR Project Manager

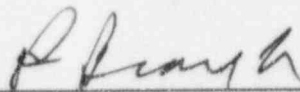
300082

ATTACHMENT TO LETTER NO. 3F0996-14

STATE OF FLORIDA

COUNTY OF CITRUS

P. M. Beard, Jr. states that he is the Senior Vice President, Nuclear Operations 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.

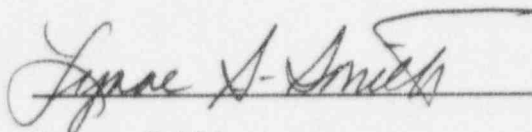


P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 23rd day of SEPTEMBER, 1996.

LYNNE S. SMITH

Notary Public (print)



Notary Public

Notary Public, State of Florida at Large,

My Commission Expires: _____



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER)

FLORIDA POWER CORPORATION)

DOCKET NO. 50-302

CERTIFICATE OF SERVICE

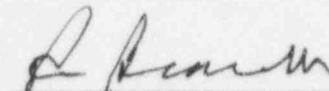
P. M. Beard, Jr. deposes and says that the following has been served on the Designated State Representative and Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,
Board of County Commissioners
of Citrus County
Citrus County Courthouse
Inverness, FL 34450

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

A copy of Technical Specification Change Request No. 206, Revision 0.

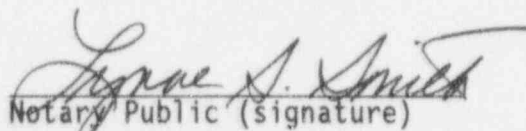
FLORIDA POWER CORPORATION



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

SWORN TO AND SUBSCRIBED BEFORE ME THIS 23rd DAY OF SEPTEMBER, 1996

LYNNE S. SMITH
Notary Public (print)


Notary Public (signature)

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



FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72
REQUEST NO. 206, REVISION 0
ENGINEERED SAFEGUARDS ACTUATION SYSTEM AUTOMATIC ACTUATION LOGIC

LICENSEE DOCUMENT INVOLVED: Technical Specifications

PORTION: Surveillance Requirement 3.3.7.1

DESCRIPTION OF REQUEST:

SR 3.3.7.1 The NOTE preceding the Surveillance Requirement is deleted.

REASON FOR REQUEST:

The NOTE states:

"When an ESAS automatic actuation logic matrix is placed in an inoperable status solely for performance of this Surveillance, entry into associated Conditions and Required Actions may be delayed for up to 8 hours, provided the associated ES function is maintained."

Because of the design of the Engineered Safeguards Actuation System (ESAS) and the way the CHANNEL FUNCTIONAL TEST is performed, maintenance of the "associated ES function" is not possible. When the automatic actuation logic for a particular function is placed in "test," for either the "A" or "B" ES train, the associated components for that train are blocked from actuation in response to a valid automatic or manual actuation. Thus, the NOTE, as currently written, does not provide the relief intended.

EVALUATION OF REQUEST:

Performance of the CHANNEL FUNCTIONAL TEST for the ESAS automatic actuation logic is done by ES function. During the test, that function is bypassed while the actuation matrices are tested. The three ES functions tested (high pressure injection, low pressure injection, and reactor building isolation and cooling) are tested separately. During the time they are bypassed, the associated end devices will not respond to either an automatic or manual actuation of the ESAS function. Deleting the Note will eliminate possible confusion over the need to enter the applicable Condition.

The Required Action for Condition A of the Specification ("One or more automatic actuation logic matrices inoperable") allows one hour to place the component(s) in the ES configuration or declare them inoperable. This time is adequate to complete testing of the individual test groups, including the time needed to assess potential equipment failures. In the event of a failure of an individual ES actuation matrix, the affected equipment is placed in the ES configuration or declared inoperable until repaired while the remaining matrices are returned to an OPERABLE configuration.

SHOLLY EVALUATION OF REQUEST:

Florida Power Corporation (FPC) has reviewed the requirements of 10 CFR 50.92(c) as they relate to the proposed deletion of the NOTE for SR 3.3.7.1 (Engineered Safety Features Actuation System Automatic Actuation Logic CHANNEL FUNCTIONAL TEST) and considers the proposed change does not involve a significant hazards consideration. In support of this conclusion, the following analysis is provided:

1. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated because unavailability of equipment is recognized in the design of the plant and in the Technical Specifications. The probability and consequences of accidents previously evaluated are bounded by the evaluations done for the allowed outage time of the associated functions.
2. The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated because the bypassing of ES functions for testing purposes does not place the plant in a configuration which would allow the possibility of a new or different kind or accident to be created.
3. The proposed change will not involve a significant reduction to the margin of safety because deleting the NOTE does not effect the way the test is performed. The test is required by the Technical Specifications and will still be performed in the same manner. Thus, there is no change in the unavailability of the system as a result of this change and the margin of safety is not reduced.