

**Florida  
Power**  
CORPORATION

July 17, 1985  
3F0785-12

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  
Alternative Shutdown Capability

- References: 1) FPC letter to NRC, #3F1082-32, dated October 29, 1982
- 2) NRC letter to FPC, #3N0183-05, dated January 6, 1983, "Crystal River Unit 3 Safety Evaluation Report Appendix R to 10 CFR 50"
- 3) FPC letter to NRC, #3F0585-11, dated May 17, 1985

Dear Sir:

By Reference 1, Florida Power Corporation (FPC) proposed design features of a Dedicated Remote Shutdown Panel (DRSP) to meet the requirements of 10 CFR 50 Appendix R, Sections III.G.3 and III.L. In Reference 2, the NRC staff provided a safety evaluation of FPC's proposed design, concluding that the Remote Shutdown Panel satisfied those requirements with one exception. The exception was resolved with FPC's commitment to install a source range neutron flux monitor at the Remote Shutdown Panel.

In Reference 3, FPC provided clarifying information relative to the Remote Shutdown System design described briefly in your Safety Evaluation Report. Ongoing review of our total effort for compliance with 10 CFR 50 Appendix R, Sections III.G, J, L and O has raised concern that additional clarification is required.

8507220399 850717  
PDR ADOCK 05000302  
F PDR

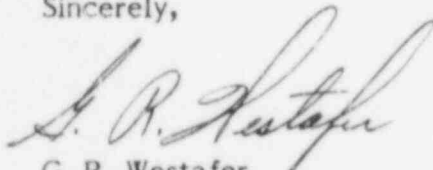
A006  
1/0

July 17, 1985  
3F0785-12  
Page 2

FPC has installed a Dedicated Remote Shutdown Panel with alternative shutdown capability essentially as described in Reference 1, meeting the requirements of Appendix R, Sections III.G.3 and III.L.1. The panel also contains additional capability provided for operator flexibility and process monitoring which exceeds the minimum requirements and necessary to perform the functions listed in Section III.L.1. Not all the redundant capability and control provided by the panel for functions over and above the minimum required have been protected for all fire scenarios. Specifically, a cable spreading room fire may disable some of the components. Regardless of the scenario, FPC has provided a Dedicated Remote Shutdown Panel that assures at least one train of equipment will remain operable for a fire in the control room, cable spreading room, or HVAC equipment room concurrent with a loss of offsite power; two trains will remain operable for certain scenarios.

FPC is confident that our Dedicated Remote Shutdown Panel meets the requirements of Appendix R, Sections III.G and III.L and exceeds the minimum acceptable capabilities for alternative shutdown. We are concerned, however, that without this clarifying information, the safety evaluation report description of our Remote Shutdown System may be interpreted to indicate that FPC has provided redundant shutdown capabilities for all scenarios. Should you have any questions or require further information, please contact this office.

Sincerely,



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

SCP/feb