

**Florida
Power**
CORPORATION

July 17, 1985
3F0785-23

Director of Nuclear Reactor Regulation
Attention: Mr. Gus Lainas, Assistant Director
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
Regulatory Effectiveness Review

Dear Sir:

Your letter of June 18, 1985 transmitted to Florida Power Corporation (FPC) the result of our January 7-11, 1985 Regulatory Effectiveness Review (RER). We have discussed with your staff some potentially significant irregularities in the transmittal of this report as well as the delay experienced in our receipt (the letter was received on July 3, 1985 although it was dated June 18, 1985).

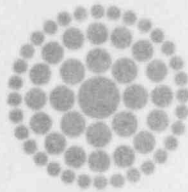
This delay as well as the resources necessary to resolve restart issues associated with compliance with 10 CFR 50.48 (Appendix R) and the number and scope of open items in the RER will require longer than the requested time of July 18, 1985 to prepare an appropriate response. Therefore, our response will be submitted by September 1, 1985.

Finally, although the report does not squarely address the issue, it is apparent the staff has changed its position(s) based upon an unpublished guidance in the security area. Conversations with members of the NMSS staff indicate that staff no longer accepts HPI cooling as an acceptable transient mitigation configuration. This is inconsistent with our FSAR, Revision 4 of our Model

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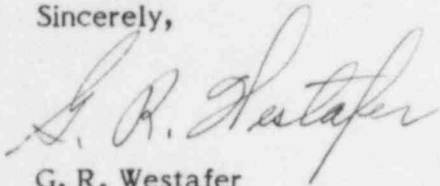
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Amended Security Plan and many docketed analyses/discussions. FPC considers this action to constitute a plant specific backfit. Your required actions pursuant to Generic Letter 84-08 and subsequent requirements will be a necessary input to our September 1, 1985 response. The timeliness of your response will ensure that we can meet our commitment.

Sincerely,

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

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

KRW/feb