

JUN 19 1985

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Florida Power Corporation  
ATTN: Mr. W. S. Wilgus  
Vice President Nuclear Operations  
P. O. Box 14042, M.A.C. H-2  
St. Petersburg, FL 33733

Gentlemen:

SUBJECT: CRYSTAL RIVER 3 TECHNICAL SPECIFICATION CHANGE REQUEST NO. 128 -  
ENGINEERED SAFEGUARDS (ES) EQUIPMENT TESTS

By letters dated May 1, 1985 and June 14, 1985, Florida Power Corporation (FPC) requested Technical Specification (TS) changes covering certain ES equipment tests to resolve conflicts with commitments made to provide increased protection against possible low temperature overpressurization during such tests. Included in these requests is a one-time waiver of the 18-month frequency requirement for TS Sections 4.8.1.1.2.c.3 and c.5 until Mode 3 during the startup for Cycle 6. Also included is authorization to perform tests covered by those sections in Mode 3.

We have reviewed the safety aspects of this request and conclude the following:

1. There is no reason to believe that the reliability of the diesel generators will be significantly affected during the period of time until the plant reaches Mode 3 and the testing can be completed. Other required diesel generator tests will have been successfully completed.
2. Core decay heat is very low considering that fuel heat has been decaying for at least 3 months.

In view of the above, we believe that the requirement for TS Sections 4.8.1.1.2.c.3 and c.5 has no safety significance and no enforcement action will be taken provided that:

1. The remaining surveillance testing specified in TS 4.8.1.1.2 will be completed for one emergency diesel generator prior to movement of fuel. Therefore, aside from the testing specified in TS 4.8.1.1.2.c.3 and c.5, the diesel generator will be fully operable.
2. Surveillances required by TS 4.8.1.1.2.c.3 and c.5 will be completed in Mode 3 prior to entering Mode 2.

Sincerely,

Original signed D. Verrelli

Roger D. Walker, Director  
Division of Reactor Projects

cc: (See page 2)

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PDR ADOCK 05000302  
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Florida Power Corporation

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cc: E. M. Howard, Director  
Site Nuclear Operations  
P. F. McKee, Nuclear Plant Manager  
G. R. Westafer, Manager  
Nuclear Operations Licensing  
and Fuel Management

bcc: G. Lainas  
J. Stolz  
H. Silver  
R. Walker  
V. Brownlee  
V. Panciera  
NRC Resident Inspector  
Document Control Desk  
State of Florida

RII

VPanciera:jk  
6/18/85

RII

HCD /  
VBrownlee  
6/18/85