

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1): CRYSTAL RIVER UNIT 3 DOCKET NUMBER (2): 05000302 PAGE (3): 1 OF 10

TITLE (4):

DEVIATION FROM ADMINISTRATIVE CONTROLS FOR LOW TEMPERATURE OVER-PRESSURI

EVENT DATE (5): MONTH DAY YEAR 1 2 1 1 8 4 8 4 LER NUMBER (6): SEQUENTIAL NUMBER REVISION NUMBER 0 2 3 0 1 0 2 1 0 8 6 REPORT DATE (7): MONTH DAY YEAR 1 0 8 6 OTHER FACILITIES INVOLVED (8): FACILITY NAMES DOCKET NUMBER(S) N/A 0 5 0 0 0 0 N/A 0 5 0 0 0 0

OPERATING MODE (9): 1 THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11):
POWER LEVEL (10): 0.9 3
20.402(b) 20.405(c) 50.73(a)(2)(iv) 73.71(b)
20.405(a)(1)(i) 50.36(a)(1) 50.73(a)(2)(v) 73.71(a)
20.405(a)(1)(ii) 50.36(a)(2) 50.73(a)(2)(vi) X OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iii) 50.73(a)(2)(i) 50.73(a)(2)(viii)(A)
20.405(a)(1)(iv) 50.73(a)(2)(ii) 50.73(a)(2)(viii)(B)
20.405(a)(1)(v) 50.73(a)(2)(iii) 50.73(a)(2)(ix) Voluntary

LICENSEE CONTACT FOR THIS LER (12): NAME P. G. Haines, Site Nuclear Licensing TELEPHONE NUMBER 904 795-3802

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13):

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14): YES (If yes, complete EXPECTED SUBMISSION DATE) X NO EXPECTED SUBMISSION DATE (15): MONTH DAY YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

The Safety Evaluation Report prepared by the NRC in support of License Amendment 21 describes several administrative controls to prevent low temperature overpressurization events at Crystal River Unit 3. Subsequent to committing to those controls, Florida Power Corporation identified on December 11, 1984 that they are in conflict with some existing plant practices. It should be noted that other administrative controls are in place that have successfully prevented low temperature overpressurization events.

Corrective actions include submission of a request for change to applicable Technical Specifications.

LER 84-023 is submitted voluntarily for information.

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U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

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TEXT (If more space is required, use additional NRC Form 366A 2) (17)

EVENT DESCRIPTION

On several occasions during the operation of the plant, the High Pressure Injection (BQ) pumps and discharge valves have been tested in Modes 4 or 5, thus deviating from several letters of commitment and the Safety Evaluation Report on Amendment 21 to Technical Specifications. This was identified by a Quality Programs Audit on December 11, 1984. Those deviations were discovered by a routine internal audit and were previously reported in LER 83-50 dated December 22, 1983 as a failure to perform surveillance testing prior to mode ascension.

By letters dated December 2, 1976; February 17, 1977, and January 5, 1978, Florida Power Corporation committed to several administrative controls to help provide Reactor Coolant System low temperature overpressure protection (LTOP). These administrative controls are cited in the NRC's Safety Evaluation Report for License Amendment 21. The particular controls at issue here are summarized below:

1. High Pressure Injection (HPI) discharge valves (MUV-23, MUV-24, MUV-25, MUV-26) may be closed and "racked out" when below 280 degrees Fahrenheit (Modes 4, 5, and 6).
2. During shutdown, the HPI pumps (MUP-1A, MUP-1B, MUP-1C) will be tested only when the reactor vessel head is removed.

The above commitments are in conflict with the following Technical Specifications:

1. Specification 4.5.2.g requires (following a system modification) an HPI flow balance test during shutdown at a system pressure of 600 psig. This test cannot be performed with the HPI discharge valves closed and breakers "racked out," nor can the required system pressure be attained with the reactor vessel head removed.
2. Specification 4.5.2.f requires HPI valves to be tested during shutdown by injection of a test signal. Again, "racked out" breakers preclude the performance of this test.
3. Specification 4.8.1.1.2.c.3 requires that Engineered Safeguards equipment (including HPI pumps) be actuated and loaded onto a running Emergency Diesel Generator. It is not desirable to perform this test in Mode 6 due to the potential for overfilling the fuel transfer canal and the resultant increase in Reactor Building airborne activity. Furthermore, the test would be difficult to control with the HPI valve breakers "racked out."

In deviation from the administrative controls discussed above, Crystal River Unit 3 has performed HPI valve and pump testing in Modes 4 or 5. Careful review reveals that such testing is permitted under the applicable Technical Specifications.

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Florida Power Corporation has reviewed our original commitments regarding administrative controls to prevent low temperature overpressurization, and has identified additional deviations outlined in Attachment I.

As a result of this review the original commitments will be revised and clarified such that the original intent is maintained while still allowing operation within the limits of other commitments. Attachment I provides a complete summary of the original and revised commitments regarding administrative controls for low temperature overpressure protection. It should be considered as superseding any previous commitments regarding this matter.

SAFETY CONSIDERATIONS

The Safety Evaluation Report for Amendment 21 granted credit for certain administrative controls as a supplement to the Overpressure Mitigating System. During the performance of surveillance procedures pertaining to ECCS components, the probability of an overpressurization occurrence may have increased beyond that considered in the evaluation report. At no time, however, were the pressure/temperature limits of Specification 3.4.9.1 exceeded. Furthermore, the deviations cited resulted in no violations of Technical Specifications since all applicable surveillance requirements were satisfied. Other administrative controls apart from those discussed above have successfully prevented any low temperature overpressurization events.

CORRECTIVE ACTION

A request for changes to the applicable Technical Specifications such that they conform to previous commitments has been issued by the NRC.

To prevent future deviations due to an over restrictive commitment, certain original commitments have been revised to relieve the restricting aspect while maintaining the original intent and level of protection. Refer to Attachment I of this report.

Because of the potential impact upon plant operation, applicable procedures are being reviewed and revised on a priority bases.

- 1) Applicable procedures have been prioritized based upon anticipated use, significance and outage schedule;
- 2) Based upon the established priority, procedures are being reviewed and revised such that procedures which will be performed during the current outage will be revised, if required prior to startup.
- 3) The remaining applicable procedures not addressed by 1 and 2 above will be reviewed for LTOP commitments by July 30, 1986.

This LER is submitted for information. This is the first time that deviations from administrative controls for low temperature overpressure protection have been identified.

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TEXT (if more space is required, use additional NRC Form 388A 2/117)

ATTACHMENT I

The scope of the following commitments address administrative controls for normal plant operation during cooldowns, heatups, and shutdown operation. These commitments are NOT applicable anytime the reactor coolant system is open to the reactor building atmosphere and adequate relieving capacity is available (adequate capacity-equivalent or greater than the relieving capacity of the PORV).

- 1) ORIGINAL COMMITMENT - A dual setpoint is utilized for the pilot-actuated relief valve to provide overpressure protection during start-up and shutdown conditions. The low setpoint is enabled by actuation of a switch in the control room during the plant cooldown prior to start-up of the Decay Heat Removal System at 280 degrees F. RCS temperature. (FPC letter to NRC, dated February 2, 1977, section 3.1.)

DEVIATION - Because the cooldown/heatup procedure directs the low pressure setpoint to be enabled below 550 psig, the potential for deviation existed.

REVISED COMMITMENT - Crystal River Unit 3 will manually enable the PORV Low Pressure Setpoint (550 psig) during cooldown at 250 degrees F. and enable the PORV Normal Pressure Setpoint (2450 psig) during heatup at 280 degrees F.

REASON - The commitment is being revised because the original commitment was overly restrictive during cooldown. These temperatures are based on the reactor coolant system pressure/temperature curves and our original commitment. The commitment with respect to heatup is based on the pressure/temperature curve in our Technical Specification with an additional margin similar to the margin allowed in the heatup commitment. This is possible because the cooldown is less restrictive than the heatup curve.

- 2) ORIGINAL COMMITMENT - Maintenance on the pilot-actuated relief valve located on the pressurizer will be performed only when the Reactor Coolant System is in modes five or six and is at steady state conditions. (Response No. 6 in FPC letter dated December 2, 1976.)

If the pilot actuated relief valve has been removed from service during a plant cooldown because of malfunction or intolerable high leakage, one of the two redundant overpressure protection methods has been removed. For all credible pressure increasing events, the control room operator has sufficient time to terminate the event before 550 psig pressure is reached. To provide redundant protection in this situation for failure of the makeup control valve, the pressurizer level will be controlled automatically at 180 inches or below during cooldown. By maintaining this level in the pressurizer and the makeup tank level at or below the high alarm level (86 inches), the RCS pressure will not exceed 550 psig in the event of makeup valve failure even without operator action to terminate the transient. (Response No. 14 in FPC letter date February 17, 1977.)

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TEXT (If more space is required, use additional NRC Form 366A (11/77))

The pilot actuated relief valve will be tested during shutdown using methods and procedures in accordance with Section XI of the ASME Boiler and Pressure Vessel Code. (Response No. 13 in FPC letter dated February 17, 1977.)

DEVIATION - Because we enter mode 6 when the first vessel head bolt is de-tensioned, it is possible PORV maintenance may have been performed without having vessel head completely removed.

REVISED COMMITMENT - Maintenance and/or testing on the pilot-operated relief valve located on the pressurizer will not be performed when the reactor coolant temperature is below 280 degrees unless all of the following conditions are met:

1. The pressurizer level is less than or equal to 180 inches;
2. The makeup tank level is less than or equal to 86 inches;
3. The reactor coolant pressure is less than or equal to 250 psig;
4. High pressure injection is isolated per commitment five within this LER;
5. The core flood tanks are isolated or depressurized per commitment seven within this LER.

REASON - The original commitment was overly restrictive because it did not recognize that maintenance of the PORV could occur during mode 4 under appropriate conditions. Furthermore it allowed testing/maintenance during mode 5 without imposing appropriate additional restrictions. With the above conditions met, the operator will have at least ten (10) minutes to take appropriate action if the makeup control valve fails to open. (Refer to letter dated February 17, 1977, figure 1.)

- 3) ORIGINAL COMMITMENT - As an alternative to limiting the makeup tank volume, we propose to limit the maximum pressurizer level during plant cooldown to 180 inches or below. (Response No. 9 in FPC letter dated February 17, 1977.)

During the start-up and shutdown conditions at temperature below the Decay Heat Removal System "cut-in" temperature, a level above the high-high level alarm point will be permitted only at RCS pressures of 100 psig or less. (Section 3.1(2) of FPC letter dated February 17, 1977.)

Crystal River Unit 3 will always operate with a steam or nitrogen gas bubble in the pressurizer; no operation will involve a "solid water" condition. (FPC letter dated December 2, 1976.)

DEVIATION - None.

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REVISED COMMITMENT - Crystal River Unit 3 will maintain the pressurizer level at or below 180 inches during cooldowns and heatups when the reactor coolant pressure is below 550 psig and above 100 psig; pressurizer level will be maintained below 275 inches when the reactor pressure is below 100 psig.

REASON - This revision clarifies the original commitment. The allowance to go up to 275 inches when below 100 psig is based on the analysis in the letter dated February 17, 1977, figure 1A.

- 4) ORIGINAL COMMITMENT - FPC will maintain the makeup tank level at or below the high level alarm of 86 inches during cooldown. (Response No. 9 in FPC letter dated February 17, 1977.)

DEVIATION - No known deviations. The cooldown procedure specifically requires that the makeup tank level be maintained below 86 inches. However, under certain conditions the level may have exceeded the high level alarm.

REVISED COMMITMENT - FPC will maintain the makeup tank level at or below a level of 86 inches during cooldown.

REASON - The original wording is being clarified because of concern that it might be interpreted as requiring the high level alarm to always remain at 86 inches. Dropping the reference to a steam or nitrogen bubble in the pressurizer will not diminish our commitments. Maintaining the water in the pressurizer within the stated ranges continues to assure a "bubble" in the pressurizer.

- 5) ORIGINAL COMMITMENT - The circuit breakers for the normally closed HP injection motor operated valves will be "locked out" during plant cooldown prior to the start-up of the Decay Heat Removal System. The breakers would not be "locked" in during the plant heatup until RCS temperature reaches 280 degrees F. (Response No. 7 in FPC letter dated February 17, 1977.)

The circuit breakers for the four normally closed HP Injection motor-operated valves are "locked out" in the closed position during plant cooldown prior to start-up of the Decay Heat Removal System. This is accomplished by opening and tagging the selector switch in the control room and locking out and tagging the breakers located at the Motor Control Center. The operator has indication that power has been removed as the status lights in the control room will be off, (Response No. 12 in FPC letter dated February 17, 1977.)

DEVIATION - Refer to LER event description.

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TEXT (If more space is required, use additional NRC Form 366A 2/17)

REVISED COMMITMENT - Motor operated valves MUV-23, MUV-24, MUV-25, and MUV-26 will be closed and de-energized with their circuit breakers "red tagged" in the "locked reset" position to the Nuclear Shift Supervisor whenever the reactor coolant temperature is below 265°F. If maintenance, testing, or other plant conditions require operation of these valves, the following requirements will be met:

1. Double valve isolation on the main and recirculation discharge lines is maintained between injection trains, and
2. The HP injection pump in the affected train is de-energized with its circuit breaker "locked out" and "red tagged" to the Nuclear Shift Supervisor, and
3. The HP injection pump suction or discharge valve in the affected train is de-energized with its circuit breaker in the "locked reset" position and "red tagged" to the Nuclear Shift Supervisor.

REASON - The original commitment was too restrictive because 280 degrees F. is a mode change above which the valves must be operable; therefore, a temperature BELOW the mode change (280 degrees F.) is needed to provide a reasonable band in which to perform the required actions for de-energizing and tagging the associated circuit breakers. A temperature of 265 degrees F. provides such a band while still providing adequate administrative control. The exemption for double valve isolation allows single train valve maintenance to be performed while maintaining full protection.

- 6) ORIGINAL COMMITMENT - No testing of the HPI pumps during shutdown as required by CR-3 Technical Specifications, will be performed except when the reactor vessel head is physically removed from the vessel. (Response No. 7 in FPC letter dated February 17, 1977.)

DEVIATION - Refer to LER event description.

REVISED COMMITMENT - No testing of the HPI pumps (normal operation of a single makeup pump is exempted) will be performed when the reactor coolant temperature is below 280 degrees F. UNLESS double valve isolation is maintained between the RCS and all flow paths from the pump(s) being tested.

REASON - The original commitment was too restrictive because it prohibited routine pump testing when the plant was shutdown. The revised commitment allows testing while still providing adequate protection against low temperature overpressurization. The allowance to use double valve isolation to test the HPI pumps was submitted to the NRC in a letter dated July 8, 1985, and accepted in the SER for amendment number 79 dated July 23, 1985.

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TEXT (if more space is required, use additional NRC Form 365A 2/117)

- 7) ORIGINAL COMMITMENT - At 700 psig or less, the core flood tank motor operated block valves, CFV-5 and CFV-6, will be closed and the breakers placed in the "locked out" position and tagged in accordance with CP-115. (Response No. 7 in FPC letter dated February 17, 1977.)

DEVIATION - We perform the ASME section XI core flood check valve test by de-pressurizing the RCS below core flood tank pressure (625 psig to 575 psig) until the check valves open. After verifying that the check valves open, the block valves are closed and de-energized. Consequently during each test, the block valves may not have been closed until RCS pressure is below 575 psig.

REVISED COMMITMENT - Whenever the core flood tank pressure is greater than or equal to the maximum allowable RC pressure for existing RC temperature; the core flood tank motor operated block valves, CFV-5 and CFV-6, will be closed and their breakers locked out and red tagged to the Nuclear Shift Supervisor.

REASON - To allow testing to the core flood tank check valves as required by ASME section XI, FPC opens the block valves at an RCS pressure below the maximum pressure (625 psig) of the core flood tanks. Additionally the original commitment prohibited draining the core flood tanks through the core flood isolation valves even if the core flood tank pressure was outside the regions of concern. The revised commitment allows testing and draining of the Core Flood System while ensuring that these activities do not cause a low temperature overpressurization event.

- 8) ORIGINAL COMMITMENT - During cooldown the engineered safeguards actuation of the HP Injection system is bypassed at 1750 psig. If this function is not performed by the operator, he will receive an alarm. During heatup the reverse of the operating step above, takes place. (FPC letter dated January 5, 1978.)

DEVIATION - In the past we have bypassed the Engineered Safeguard actuation below a pressure of 1700 psig.

REVISED COMMITMENT - During cooldown the engineered safeguard actuation of the HP Injection system is bypassed when reactor coolant system pressure is between 1500 psig and 1700 psig. If this function is not performed by the operator, he will receive an alarm. During heatup the system actuation bypass is reset within the same pressure range.

REASON - Technical Specifications do not allow bypassing above 1700 psig. A pressure of 1500 psig corresponds to the actuation set point; therefore, the system should be bypassed before reaching 1500 psig. The intent of the original commitment is maintained because the pressure band stated is still outside the pressure/temperature ranges of concern regarding low temperature overpressurization.

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TEXT (If more space is required, use additional NRC Form 366A 2/117)

- 9) ORIGINAL COMMITMENT - As part of our cooldown procedure, the pressurizer heater banks will be placed in the off position during cooldown to prevent erroneous energizing of the heaters. This function is performed by the operator from the control room. (Response No. 12 in FPC letter dated February 17, 1977.)

DEVIATION - No known deviations. The cooldown procedure specifically requires that these heaters be turned off during cooldown. Under transient conditions, however, we may have energized these heaters to maintain RCS pressure control.

REVISED COMMITMENT - Whenever all of the following conditions exist (concurrently) the pressurizer heater banks will be selected to the off position:

1. During a normal plant cooldown, AND
2. Reactor coolant pressure is above 475 psig, AND
3. Reactor coolant temperature below 220 degrees F.

REASON - The original commitment was overly restrictive because it did not allow the use of pressurizer heaters for pressure control during any phase of the cooldown. With the RCS pressure at 475 psig or below and the pressurizer heaters erroneously left on, the RCS pressure will not reach 550 psig within the ten (10) minutes allotted for no operator action. (Refer to the analysis previously submitted in our letter dated February 17, 1977.)

- 10) ORIGINAL COMMITMENT - The cooldown, shutdown, start-up and testing of CR-3 are performed in accordance with approved plant operating procedures and Technical Specifications. The operator must initial each step of an operating procedure until completed. Following completion of a procedural section, the shift supervisor checks to see that all steps were performed and then signs the procedure indicating his acceptance. Procedural steps requiring the removal of equipment from operation or the locking out of pump and valve breakers, etc., must be performed in accordance with procedure CP-115, In-Plant Equipment Clearance and Switching Orders. This procedure requires that the operator must obtain from the shift supervisor an In-plant Equipment Clearance Order prior to removing equipment from service or locking out breakers of pumps and valves. Once the Equipment Clearance Order has been executed by the operator the equipment will be tagged in accordance with CP-115. For electrical purposes, red tags are placed on all open switches or control handles when these switches are not to be closed. For mechanical purposes, a red tagged device shall not be operated or moved from its tagged position. In the case of locking out breakers of pumps and valves, red tags are placed on both the control room breaker switches and at the breaker location. Once this equipment has been placed under these administrative restrictions, the status of this

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APPROVED OMF NO. 315G-0104

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equipment cannot be changed until the Shift Supervisor issues the appropriate Equipment Clearance Order allowing the change of status. (Response No. 11 in FPC letter dated February 17, 1977.)

DEVIATION - None.

REVISED COMMITMENT - Normal plant cooldowns and heatups are performed in accordance with approved procedures. Initialing of steps within these procedures will ensure LTOP commitments are performed.

REASON - The original commitment is being revised to make it more concise. The red tagging of equipment to ensure LTOP commitments continue to be met per the original commitment are now addressed in the specific revised commitments.