

**Florida
Power**
CORPORATION

November 15, 1985
3F1185-17

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
NUREG-0737, Supplement 1
Regulatory Guide 1.97

Dear Sir:

Nuclear Regulatory Commission (NRC) letter dated October 24, 1985 (3N1085-12) requested additional information to support our justification for exceptions to Regulatory Guide 1.97 items previously submitted. This letter addresses the six (6) remaining items listed in the letter. Florida Power Corporation (FPC) has reviewed the Technical Evaluation Report (TER) and has not found any incorrect assumptions or commitments beyond the original intent.

Item 1. Pressurizer Level - the licensee should provide additional analyses to support the deviation from the recommended range (Section 3.3.10).

Response 1. This item is presently being addressed in the B&W Owners Group Instrument and Controls Working Group on a generic basis.

The present status is: A draft of additional justification is due to be issued by B&W for review by the Working Group on November 15, 1985. The Working Group will review the draft at its December 4, 1985 meeting.

Allowing for one review and comment cycle, the schedule for completion of the additional justification by the Working Group is March 1, 1986.

FPC's schedule for submittal to the NRC is April 1, 1986.

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Item 2. Pressurizer Heater Status - the licensee should provide the instrumentation recommended by Regulatory Guide 1.97 (Section 3.3.11).

Response 2. This item is presently being addressed in the B&W Owners Group Instrument and Controls Working Group on a generic basis.

The present status is: A draft of additional justification is due to be issued by B&W for review by the Working Group on November 15, 1985. The Working Group will review the draft at its December 4, 1985 meeting.

Allowing for one review and comment cycle, the schedule for completion of the additional justification by the Working Group is March 1, 1986.

FPC's schedule for submittal to the NRC is April 1, 1986.

Item 3. Safety/Relief Valve Positions or Main Steam Flow - the licensee should install instrumentation to monitor safety/relief valve position or main steam flow (Section 3.3.14).

Response 3. FPC understands the NRC concern about this item and is presently reviewing previous studies to re-evaluate our position.

At this time, the final detail design of all other Regulatory Guide 1.97 upgrades is under review by the project team. Final issue of those design packages is due to the field not later than December 31, 1985, after which the project team can establish our new course of action, obtain management approval, and provide the new instrumentation information.

This information will be provided to the NRC along with the information on pressurizer level and heater status by April 1, 1986.

Item 4. Component Cooling Water Flow to ESF System - The licensee should verify that the alternate instrumentation is Category 2 (Section 3.3.17).

Response 4. As stated in the FPC August 21, 1984 letter (3F0884-07), Page 45, this variable is Type D Category 2. The alternate instrumentation that has been ruled acceptable by the interim TER is being upgraded to Category 2 during Refuel VI in 1987.

Item 5. Condenser Air Removal System Exhaust - The licensee should change the existing range to conform with Regulatory Guide or justify the deviation (Section 3.3.21).

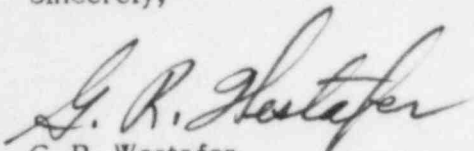
Response 5. As stated in the FPC August 21, 1984 letter (3F0884-07), Page 55, the condenser air removal system exhausts into the Auxiliary Building system exhaust in which the activity is monitored again as it is released. The range of the radiation monitor in the Auxiliary Building Vent is 10^{-6} to 10^3 uci/cc. FPC considers the range of this second monitor adequate to cover the anticipated plant radiological releases.

Item 6. Noble Gas from the Steam Generator Safety Relief Valves or Atmospheric Dump Valves - the licensee should provide additional justification for this deviation (Section 3.3.22).

Response 6. Two main steam line monitors are being relocated and recalibrated to provide monitoring of noble gas activity in atmospheric releases. The relocation and recalibration have proved necessary to meet our NUREG-0737 requirements. As a consequence, we are revising our previous submittal (August 21, 1984 (3F0884-07), Page 57) to reflect these changes. A copy of the revised Regulatory Guide 1.97 Compliance Table is attached. To specifically address the concerns in the interim TER, we offer the following responses:

- a. The CR-3 range will now include the R.G. 1.97 required range.
- b. The monitors will be Category 2 instrumentation.
- c. The procedure for determining duration of releases and mass of steam per unit time will be provided in our revised position on Safety/Relief Valve Position (see Response 3).

Sincerely,


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

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Attachment