

**Florida
Power**
CORPORATION

March 14, 1988
3F0388-08

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Technical Specification 4.0.2.b

Dear Sir:

Technical Specification (TS) 4.0.2.b requires that each surveillance requirement be performed within the specified time interval with a total maximum combined interval time for any 3 consecutive tests not to exceed 3.25 times the specified surveillance interval. This requirement is currently being applied literally. However, this application neglects time spent in refueling outages. As a result normal surveillance intervals end up being shortened to ensure compliance with TS 4.0.2.b. Refueling interval surveillances, for example, have ended up being reduced from 18 months to 12 months. This was due to the inclusion, in the surveillance due date calculation, of 6 months worth of refueling/maintenance outages that occurred within the previous 2 consecutive test intervals. This practice has in the past caused FPC and NRC resources to be unnecessarily expended.

FPC does not believe the intent of this specification was to cause normal surveillance intervals to be reduced. Rather, its intent was to assure that allowable extensions to the surveillance interval were not abused. Therefore, the following application is proposed. The total interval time for any 3 consecutive tests would not include time spent during those intervals in non-applicable modes. This total maximum combined interval time for any 3 consecutive tests would then be limited to less than 3.25 times the specified surveillance interval. This application is consistent with TS 4.0.1 which requires that surveillance requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation.

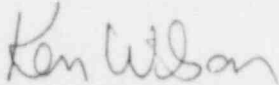
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FPC requests concurrence be provided concerning this proposed application of TS 4.0.2.b. This proposed application meets the intent of the specification and will allow both FPC and NRC resources be better utilized. Your attention in this matter is appreciated. Should you have any questions please do not hesitate to contact this office.

Sincerely,



K.R. Wilson
Manager, Nuclear Licensing

DGG/dhø

xc: Dr. J. Nelson Grace
Regional Administrator, Region II

Mr. T.F. Stetka
Senior Resident Inspector