



**Florida
Power**
CORPORATION
Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72

D809
J. O'Brien

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RULES & DIR. BRANCH
US NRC

January 10, 2000
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Mr. David L. Meyer
Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop T-6 D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Revised Criteria for Post Accident Sampling Systems
64 Fed. Reg. 66213 (November 24, 1999)

Florida Power Corporation (FPC) appreciates the opportunity to comment on the subject notice regarding the revised criteria for Post Accident Sampling Systems (PASS). FPC is in agreement with the comments provided on behalf of the nuclear energy industry by the Nuclear Energy Institute (NEI) as described in their letter to the NRC dated January 5, 2000.

In general, FPC concurs with the technical justifications of the Westinghouse and Combustion Engineering Owner's Groups that the elimination of PASS information would have no effect on the ability of offsite organizations to respond to an accident. FPC notes that there is one exception where the capability of the containment air PASS system may be useful to offsite organizations for emergency response planning. The one exception applies only to plants that would not be able to access a normal containment air sample point during the post-emergency phase of the accident, assuming reasonable remedial actions such as temporary shielding.

The situation where containment air sample results may be useful is during the planning involved with purging/venting of the containment. Many considerations pertaining to public protection are related to the estimated ground deposition levels following a purge. Issues such as the need for long term relocation or contamination of food and water supplies will depend heavily on the estimate of airborne particulate or iodine levels in the containment atmosphere. Knowledge of the containment airborne levels of particulates and iodines may dictate controls such as delay of the purge until wind directions are more favorable or the need to purge through a filtered release path.

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During the time frame that planning for purging the containment would occur following a core damage event (estimated as 5 to 60 days), sufficient time is available for most licensees to implement remedial actions such as temporary shielding to allow access to the normal containment air sampling locations. Such plants, including Crystal River Unit 3 (CR-3), would not have to maintain the containment air PASS for this purpose. However, there may be a subset of plants where the normal containment air sample points are in close proximity to sources of recirculated sump water such that access may be limited even assuming reasonable shielding efforts. It is recommended that these plants maintain the containment air grab sample capabilities of their PASS system.

Other than this one exception, FPC endorses the general conclusion that the benefits of the liquid and containment air PASS systems are negligible and the requirement for the systems can be deleted. Given the limited significance of the one exception, it is recommended that this one exception to maintain containment air grab sample capability be carried as a continuing commitment by the subset of licensees affected, and not as a regulatory requirement or order.

Please contact Mr. Sid Powell, Manager, Nuclear Licensing at (352) 563-4883, if you have any questions regarding our comments.

Sincerely,

Handwritten signature of S.L. Bernhoft, with the initials "FOR SLB" written to the right of the signature.

S.L. Bernhoft
Director, Nuclear Regulatory Affairs

SLB/twc

xc: Regional Administrator, Region II
Senior Resident Inspector
NRR Project Manager