



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 21, 2000

Mr. John Paul Cowan  
Vice President, Nuclear Operations  
Florida Power Corporation  
ATTN: Manager, Nuclear Licensing (NA1B)  
Crystal River Energy Complex  
15760 W. Power Line Street  
Crystal River, Florida 34428-6708

SUBJECT: CRYSTAL RIVER UNIT 3 - ISSUANCE OF AMENDMENT REGARDING  
EMERGENCY FEEDWATER INSTRUMENTATION (TAC NO. MA9186)

Dear Mr. Cowan:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 194 to Facility Operating License No. DPR-72 for Crystal River Unit 3 (CR-3). This amendment is in response to a Florida Power Corporation (FPC) request dated May 31, 2000. The CR-3 Improved Technical Specifications were revised regarding the required action to be taken for one or more Emergency Feedwater Initiation and Control System channels when up to two Reactor Coolant Pump status signals are inoperable.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

L. A. Wiens, Senior Project Manager, Section 2  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-302

Enclosures: 1. Amendment No. 194 to DPR-72  
2. Safety Evaluation

cc w/enclosures: See next page

NRR -058

November 21, 2000

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FLORIDA POWER CORPORATION  
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SEMINOLE ELECTRIC COOPERATIVE, INC.

DOCKET NO. 50-302

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. **194**  
License No. DPR-72

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Florida Power Corporation, et al. (the licensees), dated May 31, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

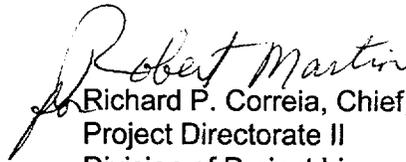
- E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. DPR-72 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 194, are hereby incorporated in the license. Florida Power Corporation shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Richard P. Correia, Chief, Section 2  
Project Directorate II  
Division of Project Licensing Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the  
Technical Specifications

Date of Issuance: November 21, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 194

TO FACILITY OPERATING LICENSE NO. DPR-72

DOCKET NO. 50-302

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

Remove Page

3.3-27  
3.3-28  
3.3-29  
B 3.3-96  
B 3.3-97

Insert Page

3.3-27  
3.3-28  
3.3-29  
B 3.3-96  
B 3.3-97



ACTIONS (continued)

| CONDITION  | REQUIRED ACTION  | COMPLETION TIME |
|--|--|-----------------|
| G. Required Action and associated Completion Time not met for Functions 1.c, 2, 3, or 4. | G.1 Reduce once through steam generator (OTSG) pressure to < 750 psig. | 12 hours        |

SURVEILLANCE REQUIREMENTS

-----NOTE-----  
Refer to Table 3.3.11-1 to determine which SRs shall be performed for each EFIC Function.  
-----

| SURVEILLANCE   | FREQUENCY                           |
|--|-------------------------------------|
| SR 3.3.11.1 Perform CHANNEL CHECK.   | 12 hours                            |
| SR 3.3.11.2 Perform CHANNEL FUNCTIONAL TEST.                               | 31 days                             |
| SR 3.3.11.3 Perform CHANNEL CALIBRATION.                                   | 24 months                           |
| -----NOTE-----<br>Only required to be performed in MODES 1 and 2.<br>----- |                                     |
| SR 3.3.11.4 Verify EFIC RESPONSE TIME is within limits.                    | 24 months on a STAGGERED TEST BASIS |

Table 3.3.11-1 (page 1 of 1)  
Emergency Feedwater Initiation and Control System Instrumentation

| FUNCTION                             | APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS | REQUIRED CHANNELS | SURVEILLANCE REQUIREMENTS                                | ALLOWABLE VALUE |
|--------------------------------------|--|-------------------|--|-----------------|
| <b>1. EFW Initiation</b>             |  |                   |  |                 |
| a. Loss of MFW Pumps                 | 1,2 <sup>(a)</sup> ,3 <sup>(a)</sup>           | 4                 | SR 3.3.11.1<br>SR 3.3.11.2<br>SR 3.3.11.3                | N/A             |
| b. OTSG Level - Low                  | 1,2,3  | 4 per OTSG        | SR 3.3.11.1<br>SR 3.3.11.2<br>SR 3.3.11.3<br>SR 3.3.11.4 | ≥ 0 inches      |
| c. OTSG Pressure - Low               | 1,2,3 <sup>(b)</sup>                           | 4 per OTSG        | SR 3.3.11.1<br>SR 3.3.11.2<br>SR 3.3.11.3                | ≥ 600 psig      |
| d. RCP Status                        | ≥ 10% RTP                                      | 4 per RCP         | SR 3.3.11.1<br>SR 3.3.11.2<br>SR 3.3.11.3                | NA              |
| <b>2. EFW Vector Valve Control</b>   |  |                   |  |                 |
| a. OTSG Pressure - Low               | 1,2,3 <sup>(b)</sup>                           | 4 per OTSG        | SR 3.3.11.1<br>SR 3.3.11.2<br>SR 3.3.11.3                | ≥ 600 psig      |
| c. OTSG Differential Pressure - High | 1,2,3 <sup>(b)</sup>                           | 4                 | SR 3.3.11.1<br>SR 3.3.11.2<br>SR 3.3.11.3                | ≤ 125 psid      |
| <b>3. Main Steam Line Isolation</b>  |  |                   |  |                 |
| a. OTSG Pressure - Low               | 1,2,3 <sup>(b)(c)</sup>                        | 4 per OTSG        | SR 3.3.11.1<br>SR 3.3.11.2<br>SR 3.3.11.3<br>SR 3.3.11.4 | ≥ 600 psig      |
| <b>4. MFW Isolation</b>              |  |                   |  |                 |
| a. OTSG Pressure - Low               | 1,2,3 <sup>(b)(d)</sup>                        | 4 per OTSG        | SR 3.3.11.1<br>SR 3.3.11.2<br>SR 3.3.11.3<br>SR 3.3.11.4 | ≥ 600 psig      |

(a) When the RPS is not in shutdown bypass.

(b) When OTSG pressure ≥ 750 psig.

(c) Except when all MSIVs are closed and deactivated.

(d) Except when all MFIVs are closed and deactivated.

BASES

ACTIONS

B.1, B.2, and B.3 (continued)

With two EFW Initiation, Main Steam Line Isolation, or MFW Isolation protection channels inoperable, one channel must be placed in bypass (Required Action B.1). Bypassing another channel is not possible due to system interlocks. Therefore, the second channel must be tripped (Required Action B.2) to prevent a single failure from causing loss of the EFIC Function. The 1 hour Completion Time is adequate to perform the Required Actions and minimizes the period of time the plant is at risk due to this condition.

Required Action B.3 provides a limit on the period of time an EFIC instrumentation channel is allowed to remain in bypass. While this Condition appears to satisfy system single failure considerations, it was not analyzed as part of the plant's original licensing basis and it is possible this configuration would not satisfy all aspects of IEEE 279 single failure criteria. As a result, the 72 hour Completion Time was added to impose a limit on the period of time the plant is allowed to operate in this Condition. As such, the Completion Time is based on engineering judgment and the IEEE 279 recommendations.

C.1

With one or more RCPPMs or the associated RCP status signals for one or two RCPs inoperable, placing the affected RCP status signals for each EFIC channel in trip will ensure OPERABILITY of the RCP status Function for the EFIC instrumentation. Required Action C.1 can be performed for up to two inoperable RCPPMs or their associated status signals and still provide protection against an inadvertent EFIC actuation due to the subsequent generation of an additional actual or spurious RCP trip signal. The 4 hour Completion Time is adequate to perform the Required Actions.

D.1

The EFW Vector Valve Control Function is required to meet the single-failure criterion for both the function of providing EFW on demand and isolating an OTSG when required. These conflicting requirements result in the necessity for two valves in series, in parallel with two valves in series, and a four channel valve command system. Refer to LCO 3.3.14, "Emergency Feedwater Initiation and Control (EFIC) Emergency Feedwater (EFW)-Vector Valve Logic" for a discussion of the logic of the system.

With one EFW Vector Valve Control channel inoperable, the system cannot meet the single-failure criterion and still meet the dual functional criteria described above. This Condition is analogous to having one EFW train inoperable. Therefore, when one vector valve control channel is inoperable, the channel must be restored to OPERABLE status within 72 hours. This Condition and Completion Time combination is consistent with the Completion Time associated with the loss of one train of EFW.

continued)

BASES

ACTIONS  
(continued)

E.1, E.2, E.3, F.1, and G.1

If the Required Actions cannot be met within the associated Completion Time, the plant must be placed in a MODE or condition in which the requirement for the particular Function does not apply. This requires the operator to open the CRD trip breakers for Function 1.a, MODE 4 for Function 1.b, reduce power to less than 10% RTP for Function 1.d, and reduce OTSG pressure to less than 750 psig for all other Functions. The allowed Completion Times are reasonable, based on operating experience, to reach the specified conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE  
REQUIREMENTS

A Note indicates that the SRs for each EFIC instrumentation Function are identified in the SRs column of Table 3.3.11-1. All Functions are subject to CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, and CHANNEL CALIBRATION. The SG-Low Level Function is modeled in transient analysis, and is subject to response time testing. Response time testing is also required for Main Steam Line and MFW Isolation. Individual EFIC subgroup relays must also be tested, one at a time, to verify the individual EFIC components will actuate when required. Some components cannot be tested at power since their actuation might lead to reactor trip or equipment damage. These are specifically identified and must be tested when shut down. The various SRs account for individual functional differences and for test frequencies applicable specifically to the Functions listed in Table 3.3.11-1. The operational bypasses associated with each EFIC instrumentation channel are also subject to these SRs to ensure OPERABILITY of the EFIC instrumentation channel when required.

SR 3.3.11.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels

(continued)



UNITED STATES  
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 194 TO FACILITY OPERATING LICENSE NO. DPR-72  
EMERGENCY FEEDWATER INITIATION AND CONTROL INSTRUMENTATION

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NO. 50-302

1.0 INTRODUCTION

By letter dated May 31, 2000, Florida Power Corporation (licensee) submitted a license amendment request to amend the Crystal River Unit 3 (CR-3) Improved Technical Specifications (ITS) 3.3.11. The proposed revision would add a new Condition C that specifies the Required Action to be taken for one or more Emergency Feedwater Initiation and Control (EFIC) System channels with up to two Reactor Coolant Pump (RCP) status signals inoperable. The licensee also proposed to revise Table 3.3.11-1, Function 1.a and Function 1.d. The Bases for ITS 3.3.11 will be revised to reflect new Required Action C.1.

2.0 BACKGROUND

At CR-3, the status of the RCPs is monitored by reactor coolant pump power monitors (RCPPMs). Each RCP is monitored by two RCPPMs, configured in a one-out-of-two arrangement. The status signals generated by the RCPPMs for each RCP are sent to all four reactor protection system (RPS) channels. In each RPS channel, the status signals divide into two parallel signal paths. One path supplies pump status signal to the RPS channel contact monitor and then to RPS channel trip module if the signal exceeds the setpoint. The second path supplies pump status signal to the corresponding EFIC initiation module. The RPS trip function is based on a two-out-of-four logic, while the EFIC initiate module detects tripped status signals from all four RCPs for each EFIC initiation channel. The two trains of RCPPMs provide redundancy in that actuation of either train accomplishes the safety function of the EFIC system.

The RCPPMs provide protection against departure from nucleate boiling (DNB) when reactor power is greater than 2475 megawatt/thermal ( $Mw_{th}$ ). The RCPPM RPS trip is credited in the loss-of-coolant flow accident analysis for a loss of four RCPs. Due to the RCPPM RPS design, a loss of a single RCPPM for a single RCP would affect all four RPS channels. Therefore, Condition C was added to ITS 3.3.1 to provide Required Action and Complete Times for inoperable RCPPMs. This Condition maintains the RPS trip safety function when the single failure criterion is not met. In addition, Condition E was added to allow continued operation with

the requirements of Condition C not met provided reactor power is reduced to less than 2475 Mw<sub>th</sub> and all four RCPs are operating. The EFIC system was installed in 1985 and added to the CR-3 Technical Specifications on July 16, 1985, by license Amendment No. 78. The EFIC system utilizes the RCPPM pump status signals to automatically actuate emergency feedwater and control the steam generator level for natural circulation. This function is required to be operable when reactor power is greater than 10 percent. Unlike the RPS Conditions, the EFIC Conditions do not include a Condition to address the loss of a single RCPPM or its associated pump status signal for a single RCP that will result in a loss of single failure capability for all four EFIC channels. Neither the EFIC ITS, nor its Bases, specifically addressed the impact on the EFIC RCP status function resulting from bypassing one or more RCPPMs.

By not adequately addressing the conditions resulting from the inoperability of one or more RCPPMs or the associated RCP status signals, the potential existed for not performing the appropriate Required Actions under certain conditions of RCPPM inoperability. This condition was reported in License Event Report (LER) 99-003 on July 1, 1999. The licensee determined that, in 1995, CR-3 had operated in a condition prohibited by the ITS. Specifically, from September 2, 1995, until October 14, 1995, CR-3 operated with one RCPPM for one RCP in bypass. Although this condition is addressed by ITS 3.3.1, "Reactor Protection System (RPS) Instrumentation," this condition also applied to ITS 3.3.11, "Emergency Feedwater Initiation and Control (EFIC) System Instrumentation." The licensee did not recognize the applicability of ITS 3.3.11 and as a result, the Limiting Condition for Operation (LCO) for the EFIC System instrumentation was not met. As part of the corrective actions taken for LER 99-003, clarifying information concerning the RCPPMs was added in ITS Bases 3.3.1, "RPS Instrumentation," and ITS Bases 3.3.11, "EFIC Instrumentation." The clarifying information ensures consistent entry into the appropriate ITS Conditions when RCPPMs are inoperable.

### 3.0 EVALUATION

Conditions C and E of the RPS Instrumentation technical specifications address the actions to be taken for the RPS RCP status function in the event of one or more inoperable RCPPMs for one RCP. With one or more RCPPMs for one RCP inoperable, Condition C requires placing the inoperable RCPPM(s) in a tripped condition within 4 hours. If Required Action and associated Completion Time of ITS 3.3.1, Condition C are not met, ITS 3.3.1 Condition E requires the plant to be in a MODE or condition in which the RCP status function for the RPS is not required to be OPERABLE. To achieve this status, four RCPs must be verified to be in operation and thermal power must be reduced to less than 2475 Mw<sub>th</sub> within 1 hour, or a plant shutdown must be commenced. The Required Actions of ITS 3.3.1, Condition E, are based on analysis which demonstrates adequate protection of DNB limits is maintained for loss-of-coolant flow accidents under these conditions. Thus, under these conditions, the RCPPM function is no longer required for RPS.

ITS 3.3.1, Condition E, allows one or both RCPPMs for all RCPs to be bypassed indefinitely with thermal power below 2475 Mw<sub>th</sub>. With one RCPPM bypassed, the single failure requirement for EFIC operability is not met. With both RCPPMs for one RCP bypassed, EFIC will not initiate on loss of all four RCPs. Therefore, ITS 3.3.1, Condition E, may cause the RCP status function for all four EFIC instrumentation channels to become inoperable.

The proposed change to ITS 3.3.11, "Emergency Feedwater Initiation and Control (EFIC) System Instrumentation," provides specific actions to be taken to ensure the operability of the EFIC RCP status function under the condition discussed above. The proposed changes require the RCP status signals sent to the EFIC Initiate Modules for the affected RCPs to be placed in trip within four hours. Since these signals are in parallel with affected RCP status signals sent to the RPS contact monitors, this action can be performed for multiple RCP status signals without causing a reactor trip. In addition, since the emergency feedwater actuation signal associated with the RCPs requires all four RCP status signals to be tripped, this action can be performed for up to two affected RCPs while still providing protection against an inadvertent EFIC actuation due to the subsequent generation of an additional actual or spurious RCP trip signal. If the Required Action and associated Completion Time of proposed ITS 3.3.11, Condition C, are not met, ITS 3.3.11 Condition F (current ITS 3.3.11 Condition E) requires thermal power to be reduced to less than 10% Rated Thermal Power within 6 hours. This places the plant in a MODE or condition in which the EFIC RCP status function is not required to be OPERABLE.

The proposed change to ITS Table 3.3.11-1, Function 1.d, will clarify the arrangement of the RCP status signals provided to EFIC by changing the wording in the required channels column for Function 1.d. from "4" to "4 per RCP." This change will ensure consistency between Table 3.3.11-1 and the information provided in Bases Section B3.3.11.

The proposed change to ITS Table 3.3.11-1, Function 1.a, will properly characterize the source of the loss of main feedwater pump signals to EFIC. As currently explained in Bases Section B3.3.11, the individual RPS channels act as the sensors for the EFIC signals for a loss of main feedwater pumps. Deleting the reference to control oil pressure and changing the allowable value for the loss of main feedwater pumps signal from " $\geq 55$  psig" to "NA" is intended to eliminate possible misunderstanding of the signal source for a loss of main feedwater pumps and ensure consistency between Table 3.3.11-1 and Bases Section B3.3.11. This proposed change to Function 1.a was identified as an enhancement to the EFIC Instrumentation Specification in the Root Cause Analysis conducted for LER 99-003.

#### 4.0 SUMMARY

The proposed change to ITS 3.3.11 provides specific actions to be taken to ensure continued operability of the RCP status function for the EFIC instrumentation in the event one or more RCPs or the associated RCP status signals become inoperable. The proposed changes to Table 3.3.11-1 clarify the RCP status signal arrangement to EFIC and the source of the Loss of Main Feedwater pump signals to EFIC. The staff finds the proposed changes acceptable.

#### 5.0 STATE CONSULTATION

Based upon a letter dated March 8, 1991, from Mary E. Clark of the State of Florida, Department of Health and Rehabilitative Services, to Deborah A. Miller, Licensing Assistant, U.S. Nuclear Regulatory Commission (NRC), the State of Florida does not desire notification of issuance of license amendments.

## 6.0 ENVIRONMENTAL CONSIDERATIONS

The amendment changes requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding (65 FR 43047). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

## 7.0 CONCLUSION

Based on its review of the licensee's proposal, the staff has determined that the changes will provide reasonable assurance of continued operability of the RCP status function for the EFIC instrumentation in the event one or more RCPs or the associated RCP status signals become inoperable, and thus are acceptable. The staff concludes that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: H. Li, EEIB, NRR

Date: November 21, 2000

Mr. John Paul Cowan  
Florida Power Corporation

**CRYSTAL RIVER UNIT NO. 3**

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