



Florida Power

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

December 21, 2000
3F1200-06

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Clarification of Fire Protection Program Change Process

- References:
1. FPC to NRC letter, 3F0291-08, dated February 22, 1991, Technical Specification Change Request No. 165, "Fire Service System"
 2. NRC to FPC letter, 3N0193-14, dated January 22, 1993, Issuance of License Amendment (No. 147) re: "Fire Service System"

Dear Sir:

By Reference 1, Florida Power Corporation (FPC) requested deletion of fire protection requirements from the Crystal River Unit 3 (CR-3) technical specifications and replacement of operating License Condition 2.C.(9) which defines the change control process for the Fire Protection Program. Amendment No. 147 to the CR-3 operating license, Reference 2, approved the technical specification revisions and modified the license condition as requested in Reference 1. The change control process for the Fire Protection Program was discussed in Reference 1 and in the Safety Evaluation Report (SER) accompanying Amendment No. 147.

During a recent review of a change to the CR-3 Fire Protection Plan it was determined that a portion of the change process described in the SER should be clarified to more accurately reflect the process as described in Reference 1. The needed clarification is provided in the attachment.

This letter clarifies an existing commitment. No revisions to existing regulatory commitments or new regulatory commitments are made in this submittal. If you have any questions regarding this submittal, please contact Mr. Sid Powell, Supervisor, Licensing & Regulatory Programs at (352) 563-4883.

Sincerely,

J. H. Terry
Manager, Engineering

JHT/rer

Attachment

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

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Clarification of Fire Protection Program Change Process Crystal River Unit 3

- References:
1. FPC to NRC letter, 3F0291-08, dated February 22, 1991, "Technical Specification Change Request No. 165, "Fire Service System"
 2. NRC to FPC letter, 3N0193-14, dated January 22, 1993, Issuance of License Amendment (No. 147) re: "Fire Service System"

Background

In Reference 1, Florida Power Corporation (FPC) requested that certain fire protection requirements be relocated from the Crystal River Unit 3 (CR-3) technical specifications to the Fire Protection Plan (FPP) and described the process for revising the FPP. The description stated that 10 CFR 50.59 would be used to revise the FPP and clarified that changes would be effective after review by the Plant Review Committee (PRC) and approval by the Director, Nuclear Plant Operations (DNPO). Reference 2, Amendment No. 147 to the CR-3 operating license, approved the relocation of the fire protection requirements and modified License Condition 2.C.(9) to describe the process for making changes to the Fire Protection Program. The modified License Condition 2.C.(9) states:

"The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire."

Section 3.0 of the Safety Evaluation Report (SER) accompanying Amendment No. 147 discussed the administrative controls to be used for revising the FPP and implementing procedures. It was stated that:

"In addition, the technical review responsibilities of the Director, Nuclear Operations and the Plant Review Committee include the review of the Fire Protection Program and implementation procedures and submittal of recommended changes."

This statement implies that the DNPO and the PRC are required to review all changes to the Fire Protection Program and implementation procedures. CR-3 procedures require PRC review only when an evaluation pursuant to 10 CFR 50.59 is required, based on a safety assessment screen. The following discusses the process described in Reference 1 that is used for reviewing proposed changes to the Fire Protection Program and implementation procedures and clarifies when PRC review and DNPO approval are required.

Fire Protection Program Change Review Process

The CR-3 Fire Protection Program consists of the FPP and implementing procedures. Proposed changes to the FPP are evaluated using a two-phased process. The first phase determines whether the proposed changes involve a decrease in the effectiveness of the Fire Protection Program as required by 10 CFR 50.48, and whether they would adversely affect the ability of the plant to achieve and maintain safe shutdown in the event of a fire as required by License Condition 2.C (9). The Fire Protection Engineer performs this review. If a decrease of effectiveness is involved, and the change is needed, a submittal to the NRC requesting approval is prepared. If no decrease in effectiveness is involved the change proceeds to the second phase, which is the review pursuant to 10 CFR 50.59. Proposed changes are screened to determine whether a 10 CFR 50.59 evaluation is required. PRC

review and DNPO approval are needed only for those FPP changes that are determined to require a 10 CFR 50.59 evaluation.

Requiring PRC review of only those FPP changes that require a 10 CFR 50.59 evaluation is consistent with the process outlined in NRC Regulatory Issue Summary 99-02, "Relaxation of Technical Specification Requirements for PORC Review of Fire Protection Program Changes," dated October 13, 1999.

In an unrelated matter, FPC considers it appropriate to take this opportunity to note changes to the names and functions of the organizations involved with the review of FPP revisions made as a result of the recent share exchange transaction between Florida Progress Corporation and Carolina Power & Light. Final Safety Analysis Report (FSAR) revisions made to reflect the completion of the share exchange transaction replaces "Plant Review Committee" and "PRC" with "Plant Nuclear Safety Committee" and "PNSC". The "Director, Nuclear Power Operations" and "DNPO" has been replaced with "Plant General Manager". The revised FSAR states that the Nuclear Assessment Section (NAS) reviews procedure revisions made pursuant to 10 CFR 50.59. Changes to the FPP and its implementing procedures made pursuant to 10 CFR 50.59 would be included. The FSAR identifies PNSC responsibilities, including review of proposed procedure changes that have been determined to require a license amendment. The proposed PNSC charter includes review of changes to the Fire Protection Plan or its implementing procedures that have been initially determined to decrease effectiveness of the plan. This review by PNSC provides a level of control comparable to that discussed in FPC's request (Reference 1) and in the SER of Amendment No. 147. FPC considers that no changes to the SER of Amendment No. 147 are needed as a result of these name and function changes.