



Crystal River Nuclear Plant  
Docket No. 50-302  
Operating License No. DPR-72

Ref: 10 CFR 50.90

February 21, 2001  
3F0201-01

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

Subject: License Amendment Request #266, Revision 0  
Safety Limit Violations and Administrative Controls

Dear Sir:

Florida Power Corporation (FPC) hereby submits License Amendment Request (LAR) #266, Revision 0, requesting changes to the Crystal River Unit 3 (CR-3) Facility Operating License No. DPR-72 in accordance with 10 CFR 50.90. The changes proposed by LAR #266 revise various administrative actions, requirements, and responsibilities contained in Improved Technical Specifications (ITS) 2.0, "Safety Limits," and ITS 5.0, "Administrative Controls," to reflect the recent CR-3 Nuclear Operations re-organization and the amended requirements of 10 CFR 50.72, 10 CFR 50.73 and 10 CFR 50.59.

FPC is currently revising the CR-3 Final Safety Analysis Report and applicable administrative procedures to address these organizational and regulatory changes. The revised documents will ensure that the actions and responsibilities contained in ITS 2.0 and ITS 5.0 will be performed by the appropriate individuals and/or functional groups within the Nuclear Operations organization in accordance with the amended regulations. However, in order to minimize the time that differences exist between the requirements in the ITS and the guidance provided in other CR-3 documents, FPC is requesting NRC approval of LAR #266 by June 2001 with a 60 day implementation period.

This letter establishes no new regulatory commitments.

If you have any questions regarding this submittal, please contact Mr. Sid Powell, Supervisor, Licensing and Regulatory Programs at (352) 563-4883.

Sincerely,

Dale E. Young  
Vice President, Crystal River Nuclear Plant

DEY/jal

A-001

Attachments:

- A. Description of Proposed Changes, Reason for Request, and Evaluation of Request
- B. No Significant Hazards Consideration Determination
- C. Environmental Impact Evaluation
- D. Proposed Revised Improved Technical Specifications and Bases Change Pages -  
Strikeout / Shadow Format
- E. Proposed Revised Improved Technical Specifications and Bases Change Pages -  
Revision Bar Format

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

**STATE OF FLORIDA**

**COUNTY OF CITRUS**

Dale E. Young states that he is the Vice President, Crystal River Nuclear Plant for Progress Energy; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
Dale E. Young  
Vice President  
Crystal River Nuclear Plant

The foregoing document was acknowledged before me this 21 day of February, 2001, by Dale E. Young.

  
\_\_\_\_\_  
*LISA A. MORRIS*  
Signature of Notary Public  
State of Florida



LISA A. MORRIS  
Notary Public, State of Florida  
My Comm. Exp. Oct. 25, 2003  
Comm. No. CC 879691

\_\_\_\_\_  
(Print, type, or stamp Commissioned  
Name of Notary Public)

Personally Produced  
Known Y -OR- Identification \_\_\_\_\_

**FLORIDA POWER CORPORATION**

**CRYSTAL RIVER UNIT 3**

**DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72**

**ATTACHMENT A**

**LICENSE AMENDMENT REQUEST #266, REVISION 0  
Safety Limit Violations and Administrative Controls**

**Description of Proposed Changes, Reason for Request, and  
Evaluation of Request**

**LICENSE AMENDMENT REQUEST NO. 266, REVISION 0  
SAFETY LIMIT VIOLATIONS AND ADMINISTRATIVE CONTROLS**

**Description of Proposed Changes**

Crystal River Unit 3 (CR-3) proposes to revise Improved Technical Specifications (ITS) 2.0, "Safety Limits," and ITS 5.0, "Administrative Controls," as follows:

1. Section 2.2, "SL Violations" - Actions 2.2.4, 2.2.5, 2.2.6 and 2.2.7 will be deleted.
2. Bases Sections B 2.1.1 and B 2.1.2 will be revised to reflect the proposed changes to ITS 2.0.
3. Section 5.1, "Responsibility" - "Director, Nuclear Plant Operations (DNPO)" in the first paragraph of Section 5.1.1 and "DNPO" in the second paragraph of Section 5.1.1 will be changed to "Plant General Manager." "Nuclear Shift Supervisor (NSS)" in Section 5.1.2 will be changed to "Control Room Supervisor."
4. Section 5.2, "Organization" - "Chief Nuclear Officer" in Section 5.2.1, Paragraph b., will be changed to "Vice President - Crystal River Nuclear Plant." Paragraph b. will be revised to read as follows: "The Vice President - Crystal River Nuclear Plant shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety. The Vice President - Crystal River Nuclear Plant shall be responsible for the overall safe operation of the plant and shall have control over those onsite activities necessary for the safe operation and maintenance of the plant."
5. Section 5.6.2.3, "Offsite Dose Calculation Manual (ODCM)" - "Director, Nuclear Plant Operations" in Section 5.6.2.3, Item 2, will be changed to "Plant General Manager."
6. Section 5.6.2.17, "Technical Specifications (TS) Bases Control Program" - Paragraph b. will be changed from "A change to the updated FSAR or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59" to "A change to the updated FSAR or Bases that requires a License Amendment as defined in 10 CFR 50.59."
7. Section 5.8, "High Radiation Area" - "Shift Supervisor on duty" in the first paragraph of Section 5.8.2 will be changed to "Control Room Supervisor."

**Reason For Request**

Improved Technical Specifications (ITS) 2.0, "Safety Limits," and ITS 5.0, "Administrative Controls," assign various administrative actions and responsibilities to specific organizational positions and functional groups at Crystal River Unit 3 (CR-3). As a result of the acquisition of Florida Progress by Progress Energy, the Nuclear Operations organization at CR-3 has been restructured to align it with the Nuclear Operations organizations at the other Progress Energy plants. The position title changes resulting from this reorganization require changes to ITS 2.0 and ITS 5.0. In addition, changes to ITS 2.0 and ITS 5.0 are needed to address the recent

revisions to 10 CFR 50.72, 10 CFR 50.73, and the 10 CFR 50.59 rule changes that will be implemented in March of this year.

## **Evaluation of Request**

Actions 2.2.4, 2.2.5, 2.2.6 and 2.2.7 of ITS 2.0 specify administrative activities to be performed in the event of a Safety Limit violation. These activities include internal and external notifications, Licensee Event Report reviews and submittals, and restart constraints. In lieu of revising these administrative actions and/or the associated Bases Sections to reflect the new Nuclear Operations organization, and the revised requirements of 10 CFR 50.72 and 10 CFR 50.73, License Amendment Request (LAR) #266 proposes to delete Actions 2.2.4, 2.2.5, 2.2.6 and 2.2.7. Florida Power Corporation considers deletion of these actions to be acceptable based on the following considerations:

1. The actions being deleted are redundant to requirements contained in 10 CFR 50.36, 10 CFR 50.72, 10 CFR 50.73, Sections 1.7 and 12.8 of the CR-3 Final Safety Analysis Report (FSAR), and the CR-3 compliance procedure governing reportability requirements and the preparation and submittal of Licensee Event Reports.

The CR-3 FSAR and applicable administrative and compliance procedures are being revised to address the CR-3 reorganization and the recently implemented changes to 10 CFR 50.72 and 10 CFR 50.73. These revisions will ensure that the administrative actions, responsibilities and requirements currently specified in ITS 2.0 for a Safety Limit violation will be performed by the appropriate individuals and functional groups at CR-3 in accordance with the revised regulations.

2. The proposed changes will result in guidance for Safety Limit violations that is consistent with the guidance contained in NUREG 1430, "Standard Technical Specifications: Babcock and Wilcox Plants."

The proposed changes to ITS 5.0 replace the CR-3 position titles currently specified in Sections 5.1.1, 5.1.2, 5.2.1, 5.6.2.3 and 5.8 with the equivalent revised organization position titles. These proposed changes, which are entirely administrative in nature, will ensure consistency between the position-specific responsibilities identified in ITS 5.0 and the current CR-3 Nuclear Operations organization as described in Section 1.7 of the CR-3 FSAR.

ITS 5.6.2.7, "Technical Specifications (TS) Bases Control Program," currently requires NRC approval of Bases changes that involve an unreviewed safety question prior to implementation. The administrative change to ITS 5.6.2.7 proposed by LAR #266 will revise the wording of this criteria to reflect the language in the amended 10 CFR 50.59 rule that will be implemented in March of this year.

**FLORIDA POWER CORPORATION**

**CRYSTAL RIVER UNIT 3**

**DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72**

**ATTACHMENT B**

**LICENSE AMENDMENT REQUEST #266, REVISION 0  
Safety Limit Violations and Administrative Controls**

**No Significant Hazards Consideration Determination**

## No Significant Hazards Consideration Determination

Crystal River Unit 3 (CR-3) proposes to revise Improved Technical Specifications (ITS) 2.0, "Safety Limits," and ITS 5.0, "Administrative Controls," as follows:

1. Section 2.2, "SL Violations" - Actions 2.2.4, 2.2.5, 2.2.6 and 2.2.7 will be deleted.
2. Bases Sections B 2.1.1 and B 2.1.2 will be revised to reflect the proposed changes to ITS 2.0.
3. Section 5.1, "Responsibility" - "Director, Nuclear Plant Operations (DNPO)" in the first paragraph of Section 5.1.1 and "DNPO" in the second paragraph of Section 5.1.1 will be changed to "Plant General Manager." "Nuclear Shift Supervisor (NSS)" in Section 5.1.2 will be changed to "Control Room Supervisor."
4. Section 5.2, "Organization" - "Chief Nuclear Officer" in Section 5.2.1, Paragraph b., will be changed to "Vice President - Crystal River Nuclear Plant." Paragraph b. will be revised to read as follows: "The Vice President - Crystal River Nuclear Plant shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety. The Vice President - Crystal River Nuclear Plant shall be responsible for the overall safe operation of the plant and shall have control over those onsite activities necessary for the safe operation and maintenance of the plant."
5. Section 5.6.2.3, "Offsite Dose Calculation Manual (ODCM)" - "Director, Nuclear Plant Operations" in Section 5.6.2.3, Item 2, will be changed to "Plant General Manager."
6. Section 5.6.2.17, "Technical Specifications (TS) Bases Control Program" - Paragraph b. will be changed from "A change to the updated FSAR or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59" to "A change to the updated FSAR or Bases that requires a License Amendment as defined in 10 CFR 50.59."
7. Section 5.8, "High Radiation Area" - "Shift Supervisor on duty" in the first paragraph of Section 5.8.2 will be changed to "Control Room Supervisor."

Florida Power Corporation (FPC) has reviewed the proposed revisions to ITS 2.0, associated Bases Sections B 2.1.1 and B 2.1.2, and ITS 5.0 against the requirements of 10 CFR 50.92(c). The proposed changes do not involve a significant hazards consideration. In support of this conclusion, the following analysis is provided:

- (1) *Does not involve a significant increase in the probability or consequences of an accident previously analyzed.*

The proposed license amendment deletes redundant administrative requirements contained in ITS 2.0, "Safety Limits" and updates position titles in ITS 5.0, "Administrative Controls," to reflect the current CR-3 Nuclear Operations organization. The design functions of the structures, systems and components at CR-3, and the initial

conditions for the analyzed accidents at CR-3 will not be affected by the change. Therefore, the change will not increase the probability or consequences of an accident previously evaluated.

- (2) *Does not create the possibility of a new or different kind of accident from any accident previously analyzed.*

The changes proposed by this amendment are administrative in nature. The proposed amendment involves no changes to the design, function or operation of any structure, system or component at CR-3 and will not result in any new plant configurations. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) *Does not involve a significant reduction in the margin of safety.*

The proposed changes are administrative in nature. The safety margins established through the design and facility license, including the CR-3 Improved Technical Specifications will not be changed by the proposed amendment. In addition, the proposed changes will ensure that administrative requirements and responsibilities contained in the ITS are consistent with the current CR-3 Nuclear Operations organization as described in the CR-3 Final Safety Analysis Report and the requirements specified in 10 CFR 50.72, 10 CFR 50.73 and 10 CFR 50.59. Thus, the proposed amendment will not result in a reduction in the margin of safety.

**FLORIDA POWER CORPORATION**

**CRYSTAL RIVER UNIT 3**

**DOCKET NUMBER 50 - 302 / LICENSE NUMBER DPR - 72**

**ATTACHMENT C**

**LICENSE AMENDMENT REQUEST #266, REVISION 0**  
**Safety Limit Violations and Administrative Controls**

**Environmental Impact Evaluation**

## Environmental Impact Evaluation

10 CFR 51.22(c)(9) provides criteria for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration, (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (3) result in a significant increase in individual or cumulative occupational radiation exposure.

Florida Power Corporation has reviewed this license amendment request and has determined that it meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(c), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the proposed license amendment. The basis for this determination is as follows:

1. The proposed license amendment does not involve a significant hazards consideration as described previously in the no significant hazards evaluation for this license amendment request.
2. The changes proposed by this amendment delete redundant administrative requirements contained in Improved Technical Specifications (ITS) 2.0, "Safety Limits", and update position titles in ITS 5.0, "Administrative Controls," to reflect the current Crystal River Unit 3 Nuclear Operations organization. The proposed changes are administrative in nature, and do not affect any plant systems that are involved in the generation or processing of radioactive fluids. Therefore, the proposed license amendment will not result in a significant change in the types or increase in the amounts of any effluents that may be released off-site.
3. The proposed license amendment is administrative in nature. The changes proposed by this amendment do not involve equipment that interfaces with radiologically contaminated systems, and do not result in operator or other actions that could increase occupational radiation exposure. Therefore, the proposed license amendment will not result in a significant increase to the individual or cumulative occupational radiation exposure.

**FLORIDA POWER CORPORATION**

**CRYSTAL RIVER UNIT 3**

**DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72**

**ATTACHMENT D**

**LICENSE AMENDMENT REQUEST #266, REVISION 0  
Safety Limit Violations and Administrative Controls**

**Proposed Revised Improved Technical Specifications and Bases Change  
Pages**

**Strikeout / Shadow Format**

<del>Strikeout Text</del>	Indicates deleted text
Shadowed Text	Indicates added text

2.0 SLs

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2.2 SL Violations (continued)

2.2.3 In MODES 3, 4, and 5, if SL 2.1.2 is violated, restore compliance within 5 minutes.

~~2.2.4 With any SL violation, within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.~~

~~2.2.5 With any SL violation, within 24 hours, notify the appropriate Nuclear Operations senior management and the offsite reviewers specified in the Quality Assurance Plan.~~

~~2.2.6 With any SL violation, within 30 days, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the offsite reviewers specified in the Quality Assurance Plan, the Director, Nuclear Plant Operations and the Chief Nuclear Officer.~~

~~2.2.7 With any SL violation, operation of the plant shall not be resumed until authorized by the NRC.~~

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BASES (continued)

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APPLICABILITY (continued) In MODES 3, 4, 5, and 6, Applicability is not required, since the reactor is not generating significant THERMAL POWER.

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SAFETY LIMIT VIOLATIONS The following SL violation responses are applicable to the reactor core SLs.

2.2.1

If SL 2.1.1.1, SL 2.1.1.2, or SL 2.1.1.3 is violated, the requirement to go to MODE 3 places the plant in a MODE in which these SLs can not be violated.

The allowed Completion Time of 1 hour recognizes the importance of placing the plant in a MODE of operation where these SLs are not applicable and reduces the probability of fuel damage.

2.2.4

~~If SL 2.1.1.1, SL 2.1.1.2, or SL 2.1.1.3 is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 3).~~

~~The 10 CFR 50.72 part against which a Safety Limit violation would be reported is the declaration of any of the Emergency Classes specified in the Emergency Plan (10 CFR 50.72(a)(1)(i)).~~

2.2.5

~~If SL 2.1.1.1, SL 2.1.1.2, or SL 2.1.1.3 is violated, the appropriate Nuclear Operations senior management and the Nuclear General Review Committee (NGRC) shall be notified within 24 hours. This 24 hour period provides time for the plant operators and staff to take the appropriate immediate action and assess the condition of the plant before reporting to senior management.~~

(continued)

BASES

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~~SAFETY LIMIT~~ ~~2.2.6~~  
~~VIOLATIONS~~

~~(continued) If SL 2.1.1.1, SL 2.1.1.2, or SL 2.1.1.3 is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC in accordance with 10 CFR 50.73 (Ref. 4). A copy of the report shall also be provided to the NGRC, the Director, Nuclear Plant Operations, and the Chief Nuclear Officer.~~

~~The 10 CFR 50.73 part against which a Safety Limit violation would be reported is: 1) completion of a plant shutdown required by Technical Specifications, (10 CFR 50.73(a)(2)(i)(A)), 2) an event which resulted in an unanalyzed condition that significantly compromised plant safety, (10 CFR 50.73(a)(2)(ii)(A)), 3) any condition outside the design basis for the plant (10 CFR 50.73(a)(2)(ii)(B)), and 4) an event which resulted in an RPS actuation (10 CFR 50.73(a)(2)(iv)).~~

~~2.2.7~~

~~If SL 2.1.1.1, SL 2.1.1.2, or SL 2.1.1.3 is violated, operation of the plant shall not be resumed until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the plant enters the applicable MODES for these SLs (MODES 1 and 2).~~

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- REFERENCES
1. FSAR, Section 1.4.
  2. FSAR, Table 7-2.
  - ~~3. 10 CFR 50.72.~~
  - ~~4. 10 CFR 50.73.~~
  - ~~5. 10 CFR 50.36.~~
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BASES

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SAFETY LIMIT  
VIOLATIONS  
(continued)

2.2.3

If the RCS pressure SL is exceeded in MODE 3, 4, or 5, RCS pressure must be restored to within the SL value within 5 minutes.

Exceeding the RCS pressure SL in MODE 3, 4, or 5 is potentially more severe than exceeding this SL in MODE 1 or 2, since the reactor vessel temperature may be lower and the vessel material, consequently, less ductile. As such, pressure must be reduced to less than the SL within 5 minutes. This action does not require reducing MODES, since this would require reducing temperature, which would compound the problem by adding thermal gradient stresses to the existing pressure stress.

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2.2.4

~~If the RCS pressure SL is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 8).~~

~~The 10 CFR 50.72 part against which a Safety Limit violation would be reported is the declaration of any of the Emergency Classes specified in the Emergency Plan (10 CFR 50.72(a)(1)(i)).~~

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2.2.5

~~If the RCS pressure SL is violated, the appropriate Nuclear Operations senior management and the Nuclear General Review Committee (NGRC) shall be notified within 24 hours. This 24 hour period provides time for the plant operators and staff to take the appropriate immediate action and assess the condition of the plant before reporting to the senior management.~~

(continued)

BASES

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~~SAFETY LIMIT~~ ~~2.2.6~~  
~~VIOLATIONS~~

~~(continued)~~ If the RCS pressure SL is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC in accordance with 10 CFR 50.73 (Ref. 9). A copy of the report shall also be provided to the NGRC, the Director, Nuclear Plant Operations, and the Chief Nuclear Officer.

~~The 10 CFR 50.73 part against which a Safety Limit violation would be reported is: 1) completion of a plant shutdown required by Technical Specifications, (10 CFR 50.73(a)(2)(i)(A)), 2) an event which resulted in an unanalyzed condition that significantly compromised plant safety, (10 CFR 50.73(a)(2)(iv)).~~

~~2.2.7~~

~~If the RCS pressure SL is violated, operation of the plant shall not be resumed until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed by establishing limitations on ascending MODES or other specified conditions in the Applicability until the NRC review is complete.~~

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REFERENCES

1. FSAR, Section 1.4.
2. ASME Boiler and Pressure Vessel Code, Section III, Article NB-7000.
3. ASME Boiler and Pressure Vessel Code, Section XI, Articles IWA-5000 and IWB-5000.
4. BAW-10043, May 1972.
5. FSAR, Section 14.
6. ASME USAS B31.7, Code for Pressure Piping, Nuclear Power Piping, February 1968 Draft Edition.

(continued)

BASES

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- REFERENCES  
(continued)
- 7. 10 CFR 100.
  - ~~8. 10 CFR 50.72.~~
  - ~~9. 10 CFR 50.73.~~
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5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

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5.1.1 The **Plant General Manager** Director, Nuclear Plant Operations (DNPO) shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The **Plant General Manager** DNPO or his designee shall approve, prior to implementation, each proposed test, experiment or modifications to systems or equipment that affect nuclear safety.

5.1.2 The **Control Room Supervisor** Nuclear Shift Supervisor (NSS) shall be responsible for the control room command function. During any absence of the **Control Room Supervisor** NSS from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the **Control Room Supervisor** NSS from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

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5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

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5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions responsible for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communications shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These shall be documented in the FSAR;
- b. The ~~Vice President - Crystal River Nuclear Plant~~ Chief Nuclear Officer shall be an officer of the company and shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety. The ~~Vice President - Crystal River Nuclear Plant~~ Chief Nuclear Officer shall be responsible for the overall safe operation of the plant and shall have control over those onsite activities necessary for the safe operation and maintenance of the plant; and
- c. The individuals who train the operating staff, carry out health physics or perform quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. One auxiliary nuclear operator shall be assigned to the operating shift any time there is fuel in the reactor and

(continued)

## 5.6 Procedures, Programs and Manuals

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### 5.6.2.3 ODCM (continued)

2. For Iodine-131, Iodine-133, tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to a dose rate of 1500 mrem/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public beyond the site boundary due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

#### Licensee Initiated Changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and
  - b. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent dose, or setpoint calculations.
2. Shall become effective after review and acceptance by the on-site review function and the approval of the **Plant General Manager** Director, Nuclear Plant Operations; and

(continued)

## 5.6 Procedures, Programs and Manuals

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### 5.6.2.16 SFDP (continued)

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

### 5.6.2.17 Technical Specifications (TS) Bases Control Program

Changes to the Bases of the TS shall be made under appropriate administrative controls and reviewed according to the review process specified in the Quality Assurance Plan.

Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following:

- a. A change in the TS incorporated in the license; or
- b. A change to the updated FSAR or Bases that **requires a License Amendment** ~~involves an unreviewed safety question as defined in 10 CFR 50.59.~~

The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.

Proposed changes that meet the criteria of Specification 5.6.2.17.a or Specification 5.6.2.17.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71.

### 5.6.2.18 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

- SL 2.1.1.1 API Protective Limit
- LCO 3.1.1 SHUTDOWN MARGIN
- SR 3.1.7.1 API/RPI Position Indication Agreement
- LCO 3.1.3 Moderator Temperature Coefficient (MTC)
- LCO 3.2.1 Regulating Rod Insertion Limits
- LCO 3.2.2 AXIAL POWER SHAPING ROD (APSR) Insertion Limits

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(continued)

## 5.0 ADMINISTRATIVE CONTROLS

### 5.8 High Radiation Area

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5.8.1 Pursuant to 10 CFR 20, paragraph 20.1601(c), alternative methods are used to control access to high radiation areas. Each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation (measured at 30 cm) is  $> 100$  mrem/hr but  $< 1000$  mrem/hr, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device that continuously integrates the radiation dose in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel are aware of them.
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance.

5.8.2 In addition to the requirements of Specification 5.8.1, areas with radiation levels  $\geq 1000$  mrem/hr at 30 cm shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the **Control Room Supervisor** ~~Shift Supervisor on duty~~ or health physics supervision. Doors shall remain locked except during periods of access by personnel.

Direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

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(continued)

**FLORIDA POWER CORPORATION**

**CRYSTAL RIVER UNIT 3**

**DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72**

**ATTACHMENT E**

**LICENSE AMENDMENT REQUEST #266, REVISION 0  
Safety Limit Violations and Administrative Controls**

**Proposed Revised Improved Technical Specifications and Bases Change  
Pages**

**Revision Bar Format**

2.0 SLs

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2.2 SL Violations (continued)

2.2.3 In MODES 3, 4, and 5, if SL 2.1.2 is violated, restore compliance within 5 minutes.

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BASES

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APPLICABILITY (continued) In MODES 3, 4, 5, and 6, Applicability is not required, since the reactor is not generating significant THERMAL POWER.

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SAFETY LIMIT VIOLATIONS The following SL violation responses are applicable to the reactor core SLs.

2.2.1

If SL 2.1.1.1, SL 2.1.1.2, or SL 2.1.1.3 is violated, the requirement to go to MODE 3 places the plant in a MODE in which these SLs can not be violated.

The allowed Completion Time of 1 hour recognizes the importance of placing the plant in a MODE of operation where these SLs are not applicable and reduces the probability of fuel damage.

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- REFERENCES
1. FSAR, Section 1.4.
  2. FSAR, Table 7-2.
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BASES

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BASES

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SAFETY LIMIT  
VIOLATIONS  
(continued)

2.2.3

If the RCS pressure SL is exceeded in MODE 3, 4, or 5, RCS pressure must be restored to within the SL value within 5 minutes.

Exceeding the RCS pressure SL in MODE 3, 4, or 5 is potentially more severe than exceeding this SL in MODE 1 or 2, since the reactor vessel temperature may be lower and the vessel material, consequently, less ductile. As such, pressure must be reduced to less than the SL within 5 minutes. This action does not require reducing MODES, since this would require reducing temperature, which would compound the problem by adding thermal gradient stresses to the existing pressure stress.

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REFERENCES

1. FSAR, Section 1.4.
  2. ASME Boiler and Pressure Vessel Code, Section III, Article NB-7000.
  3. ASME Boiler and Pressure Vessel Code, Section XI, Articles IWA-5000 and IWB-5000.
  4. BAW-10043, May 1972.
  5. FSAR, Section 14.
  6. ASME USAS B31.7, Code for Pressure Piping, Nuclear Power Piping, February 1968 Draft Edition.
  7. 10 CFR 100.
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5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

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5.1.1 The Plant General Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The Plant General Manager or his designee shall approve, prior to implementation, each proposed test, experiment or modifications to systems or equipment that affect nuclear safety.

5.1.2 The Control Room Supervisor shall be responsible for the control room command function. During any absence of the Control Room Supervisor from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the Control Room Supervisor from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

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## 5.0 ADMINISTRATIVE CONTROLS

### 5.2 Organization

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#### 5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions responsible for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communications shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These shall be documented in the FSAR;
- b. The Vice President - Crystal River Nuclear Plant shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety. The Vice President - Crystal River Nuclear Plant shall be responsible for the overall safe operation of the plant and shall have control over those onsite activities necessary for the safe operation and maintenance of the plant; and
- c. The individuals who train the operating staff, carry out health physics or perform quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

#### 5.2.2 Unit Staff

The unit staff organization shall include the following:

- b. One auxiliary nuclear operator shall be assigned to the operating shift any time there is fuel in the reactor and

(continued)

## 5.7 Procedures, Programs and Manuals

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### 5.6.2.3 ODCM (continued)

2. For Iodine-131, Iodine-133, tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to a dose rate of 1500 mrems/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public beyond the site boundary due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

#### Licensee Initiated Changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and
  - b. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent dose, or setpoint calculations.
2. Shall become effective after review and acceptance by the on-site review function and the approval of the Plant General Manager; and

(continued)

5.7 Procedures, Programs and Manuals

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5.6.2.16 SFDP (continued)

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

5.6.2.17 Technical Specifications (TS) Bases Control Program

Changes to the Bases of the TS shall be made under appropriate administrative controls and reviewed according to the review process specified in the Quality Assurance Plan.

Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following:

- a. A change in the TS incorporated in the license; or
- b. A change to the updated FSAR or Bases that requires a License Amendment as defined in 10 CFR 50.59.

The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.

Proposed changes that meet the criteria of Specification 5.6.2.17.a or Specification 5.6.2.17.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71.

5.6.2.18 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

- SL 2.1.1.1 API Protective Limit
- LCO 3.1.1 SHUTDOWN MARGIN
- SR 3.1.7.1 API/RPI Position Indication Agreement
- LCO 3.1.3 Moderator Temperature Coefficient (MTC)
- LCO 3.2.1 Regulating Rod Insertion Limits
- LCO 3.2.2 AXIAL POWER SHAPING ROD (APSR) Insertion Limits

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5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area

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5.8.1 Pursuant to 10 CFR 20, paragraph 20.1601(c), alternative methods are used to control access to high radiation areas. Each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation (measured at 30 cm) is  $> 100$  mrem/hr but  $< 1000$  mrem/hr, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device that continuously integrates the radiation dose in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel are aware of them.
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance.

5.8.2 In addition to the requirements of Specification 5.8.1, areas with radiation levels  $\geq 1000$  mrem/hr at 30 cm shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Control Room Supervisor or health physics supervision. Doors shall remain locked except during periods of access by personnel.

Direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

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