



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

Ref: 10 CFR 50.90

March 28, 2001
3F0301-01

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

Subject: License Amendment Request #259, Revision 0
Control Complex Cooling System

Dear Sir:

Florida Power Corporation (FPC) hereby submits License Amendment Request (LAR) #259, Revision 0, requesting a change to the Crystal River Unit 3 (CR-3) Facility Operating License No. DPR-72 in accordance with 10 CFR 50.90. LAR #259 revises Improved Technical Specifications (ITS) 3.7.18, "Control Complex Cooling System," to allow a one-time increase in the Completion Time for restoring an inoperable Control Complex Cooling System train from 7 days to 35 days.

The Control Complex Cooling System consists of two 100% capacity trains, each containing a chiller, a chilled water pump, and a duct-mounted air-to-water heat exchanger. The results of a recently completed engineering assessment indicate that the tubes and tube support plates for both control complex chillers are approaching the end of their service lives. FPC estimates that 21 days will be needed to replace the tubes and tube support plates for each chiller. Since this duration is greater than the 7-day Completion Time specified by ITS 3.7.18 for restoring an inoperable Control Complex Cooling System train, refurbishment of the chillers in accordance with current ITS requirements can only be performed with the plant in Mode 5 or 6.

The 35-day Completion Time requested by LAR #259 would be sequentially applied once to each Control Complex Cooling System train, allowing FPC to complete the required chiller repairs without the need for a currently unscheduled Mode 5 maintenance outage or increases to the scope, duration and cost of the next two CR-3 refueling outages. FPC estimates that adding the refurbishment of one chiller to the 2001 refueling outage would add 6 days to the outage duration and increase the outage cost by \$4.5 million.

The acceptability of the changes proposed by this submittal is supported by both risk-informed and deterministic considerations. This information, as well as discussions of the defense-in-depth measures and contingency plans that will be in effect during the time that the chiller repairs are in progress, is provided in Attachment A of this submittal.

FPC requests approval of LAR #259 by November 30, 2001 with a 30-day implementation period. The requested approval date will support FPC's intention to begin chiller refurbishment activities in the first quarter of 2002.

A001

The CR-3 Plant Nuclear Safety Committee has reviewed this request and recommended it for approval.

Attachment F lists the new regulatory commitments established in this submittal.

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

Attachments:

- A. Description of Proposed Changes, Background, 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
- F. List of Regulatory Commitments

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

Dale E. Young
Vice President
Crystal River Nuclear Plant

The foregoing document was acknowledged before me this 28th day of March, 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

LISA A MORRIS

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

Personally Produced
Known X -OR- Identification _____

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

ATTACHMENT A

**LICENSE AMENDMENT REQUEST #259, REVISION 0
Control Complex Cooling System**

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

**LICENSE AMENDMENT REQUEST NO. 259, REVISION 0
CONTROL COMPLEX COOLING SYSTEM**

Description of Proposed Changes

Crystal River Unit 3 (CR-3) proposes to revise Improved Technical Specifications (ITS) 3.7.18, "Control Complex Cooling System," by adding a note to the Completion Time for Required Action A.2 that allows the Completion Time to be increased from 7 days to 35 days once for each Control Complex Cooling System train, and establish an expiration date of December 31, 2002 for applying the 35-day Completion Times. The note would also specify that the requirements of Limiting Condition for Operation (LCO) 3.0.4 are not applicable for Condition A during the requested 35-day Completion Time for each train. Bases Section B 3.7.18 will also be revised to reflect the proposed changes.

Background

The Control Complex Cooling System is designed to provide sufficient cooling to ensure operability of safety-related equipment located in the control room and other portions of the control complex, and satisfy control room/control complex personnel occupancy requirements. The system consists of two 100% capacity trains. Each train contains a chiller and chilled water pump powered from the same 1E electrical bus, and a duct-mounted air-to-water heat exchanger. Each train is capable of maintaining nominal control complex air temperature between 70°F and 80°F. A simplified diagram of the Control Complex Cooling System is provided as Figure 1.

The Control Complex Cooling System includes a number of design features to ensure the continued availability of adequate heat removal capacity in the event of system failures. In addition to the single failure capability provided by redundant full capacity trains, the system can be aligned to use combinations of equipment in both trains to meet system heat removal requirements in the event that different components in opposite trains are inoperable. Finally, backup cooling capability for vital equipment located in the control complex can be provided by the Appendix R Chilled Water System. This system, which consists of an air-cooled chiller and chilled water pump powered from the 1E electrical distribution system, can be manually aligned to supply chilled water for cooling the Engineered Safeguards (ES) 4160 volt and ES 480 volt switchgear rooms, the 1E battery charger and inverter rooms, the remote shutdown room, and the rooms housing the Emergency Feedwater Initiation and Control (EFIC) System cabinets. The Appendix R Chilled Water System is capable of providing 100% of the required heat removal for these areas.

ITS 3.7.18 currently requires two trains of control complex cooling to be operable in Modes 1, 2, 3, 4, and during movement of irradiated fuel assemblies. In the event that one or both trains are inoperable, but at least 100% of the cooling capability of a single operable control complex cooling train is available, ITS 3.7.18 Condition A requires the inoperable Control Complex Cooling System train(s) to be restored to operable status in 7 days.

Reason For Request

The Control Complex Cooling System chillers, which were placed into operation in 1974, are approaching the end of their service lives. An evaluation recently completed by Florida Power Corporation (FPC) and the chiller vendor, York International, has determined that the chiller

evaporator and condenser tubes and tube support plates, which are the limiting components in terms of continued reliable chiller operation, will require replacement in approximately the next 2 years.

FPC estimates that 21 days will be needed to complete the necessary repairs to each chiller. Since this duration is greater than the 7-day Completion Time specified by ITS 3.7.18 for restoring an inoperable Control Complex Cooling System train, refurbishment of the chillers in accordance with current ITS requirements can only be performed with the plant in Mode 5 or Mode 6 with no movement of irradiated fuel assemblies in progress. Based on this restraint, completion of the recommended repairs within the time frame discussed above will require either a currently unscheduled Mode 5 maintenance outage or the addition of these activities to the scope of the CR-3 refueling outages scheduled for the fall of this year and for 2003. Based on the schedule for the 2001 refueling outage and the current ITS 3.7.18 requirement for the Control Complex Cooling System to be operable during movement of irradiated fuel assemblies, FPC has estimated that adding the refurbishment of one of the chillers to the scope of the outage would increase the outage duration by 6 days. Based on daily outage labor and replacement power costs, this 6-day increase would add approximately \$4.5 million to the total cost of the outage.

The one-time 35-day Completion Times requested by License Amendment Request (LAR) #259 would provide FPC with an additional option for completing the chiller repairs by allowing the repairs to be performed with the plant in Mode 1. In addition to precluding the need for an unscheduled Mode 5 outage or increases to the scope/duration of the 2001 and 2003 refueling outages, this option would allow FPC to implement a more aggressive schedule for performing the needed chiller repairs and continue to ensure system reliability. It is FPC's intention, contingent on NRC approval of LAR #259, to refurbish the "B" train Control Complex Cooling System chiller during the first quarter of 2002 and complete required repairs to the "A" train chiller by the end of the second quarter of 2002. The requested 35-day Completion Times will allow sufficient time to complete the recommended repairs to each chiller and provide adequate margin to address emergent repair activities.

Information regarding the increase in risk associated with the proposed change, as well as a discussion of contingency plans and defense-in-depth measures that will be in effect while chiller repairs are in progress, is provided below.

The requirements of LCO 3.0.4 are applicable to the current ITS 3.7.18. In order to maximize the operational flexibility resulting from the increased Completion Time proposed by LAR #259, FPC is also requesting that the applicability of LCO 3.0.4 to ITS 3.7.18 Condition A be waived during the requested one-time 35-day Completion Time for each Control Complex Cooling System Train. This change would allow CR-3 to return to power operations in the event a forced shutdown or reactor trip occurs while the recommended chiller repairs are in progress.

Evaluation of Request

The 35-day Completion Time requested by LAR #259 will be applied once to each Control Complex Cooling System train to allow on-line performance of maintenance activities that will improve the reliability of the control complex chillers and extend their service lives. FPC will take the following steps to ensure an acceptable level of safety is maintained during performance of these repairs:

1. As discussed above, the Control Complex Cooling System includes a number of design features to ensure that adequate heat removal capacity is maintained in the event that individual system components become inoperable. These design features include redundant full capacity trains and the ability to use combinations of equipment in both trains to meet system heat removal requirements in the event that different components in opposite trains are inoperable. During the time that the recommended chiller repairs are in progress, maintenance and surveillance activities that have the ability to impact the availability of the redundant Control Complex Cooling System train, required support systems and/or backup systems will be controlled in accordance with the normal work controls process. As part of this process, weekly qualitative and quantitative risk assessments of scheduled on-line maintenance activities, and additional risk assessments of emergent work activities, will be performed in accordance with the guidance provided in CR-3 Compliance Procedure CP-253, "Power Operation Risk Assessment and Management." If the results of these assessments indicate an increase in risk, appropriate actions to control temporary and aggregate risk increases and minimize risk increases above the overall plant baseline will be implemented in accordance with CP-253.
2. During chiller maintenance activities, a portable 15-ton cooling unit will be staged and available to provide cooling for the control room in the unlikely event that normal cooling capability is lost. Procedural guidance for setup and operation of the unit is contained in CR-3 Maintenance Procedure MP-193, "Temporary Cooling to the Control Complex."
3. In addition to the portable cooling unit, defense-in-depth for a loss of normal cooling will be provided by the Appendix R Chilled Water System. Prior to starting chiller repairs, annual preventative maintenance will be performed on the Appendix R Chilled Water System in accordance with CR-3 Preventative Maintenance Procedure PM-139, "HVAC Equipment Check and Service." The procedural guidance for aligning the Appendix R Chilled Water System to provide cooling to the Control Complex is provided in CR-3 Operating Procedure OP-409, "Plant Ventilation System." Prior to the start of chiller repairs, refresher training on this guidance will be conducted to ensure all appropriate personnel are prepared to promptly place the system in service, if required.

FPC has evaluated the risk associated with having each control complex chiller out of service for 35 days using the current CR-3 Probabilistic Safety Assessment Model. The increase in core damage frequency (CDF) from the current ITS 7-day Completion Time was calculated to be $2.61E-08$ /year per chiller measured from a baseline CDF that assumes one chiller is in operation and the other is in standby. This small increase is based on the design features of the Control Complex Cooling System previously described in this submittal, and takes credit for use of the Appendix R Chilled Water System to provide backup cooling for control complex heat loads. Administrative controls, preventative maintenance activities and training related to the Appendix R Chilled Water System will be implemented to maximize both the availability of the Appendix R Chilled Water System during the chiller repairs, and the ability of the operators to promptly perform the required system lineups in response to a loss of normal Control Complex cooling.

Although not applicable to a one-time ITS change, FPC has evaluated the proposed change against the risk criteria provided in Regulatory Guide (RG) 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Current Licensing Basis," and RG 1.177, "An Approach for Plant-Specific, Risk-Informed

Decision Making: Technical Specifications." Based on these criteria, FPC has determined that the risk associated with the proposed one-time change to ITS 3.7.18 is not significant. The total change in CDF (5.22E-08/year for two chillers) and the total CDF (3.45E-06/year) associated with the proposed change satisfy the Region III acceptance guidelines of RG 1.174. In addition, the calculated core damage probability (CDP) of 5.22E-08 based on two one-time 35-day chiller maintenance outages is a small fraction of the 5E-07 criteria specified in RG 1.177 as a small quantitative impact on risk.

FPC considers the request for relief from the requirements of LCO 3.0.4 for ITS 3.7.18 Condition A to be consistent with the 35-day Completion Times proposed by LAR #259 in terms of providing operational flexibility without impacting risk, redundant train/support system/backup system availability, or the ability of the Control Complex Cooling System to perform its intended safety function. This change would allow CR-3 to return to power operation in the event a forced shutdown or reactor trip occurs while the recommended chiller repairs are in progress. The acceptability of conducting a reactor and plant startup and power escalation under these conditions is based on the following considerations:

1. Procedural guidance for these evolutions does not direct the performance of any activities that would impact the redundant Control Complex Cooling System train, the Appendix R Chilled Water System, or required support systems. Therefore, relief from the requirements of LCO 3.0.4 would not result in an increase in risk as a result of a decrease in redundant train, backup system or support system availability.
2. As discussed above, the Control Complex Cooling System is designed to provide sufficient cooling to ensure operability of safety-related equipment located in the control room and other portions of the control complex. Since the control complex safety-related equipment that is required to be operable in Mode 1 is the same as that required to be operable in Mode 3, performance of these evolutions would not increase the heat removal requirements for the remaining train of the Control Complex Cooling System. Therefore, relief from the requirements of LCO 3.0.4 would not result in a decrease in safety margin (e.g., the ability of the Control Complex Cooling System to perform its required safety function).

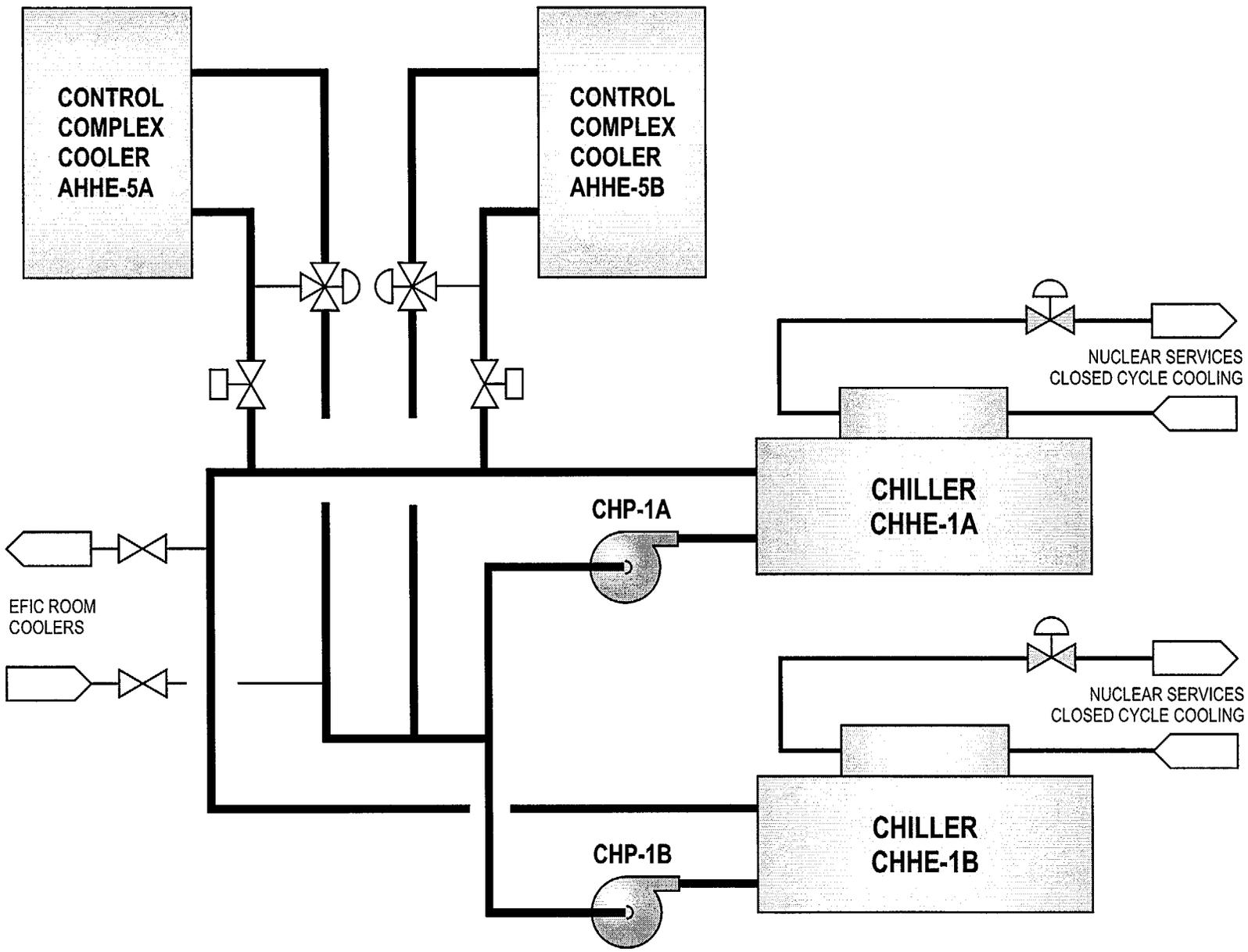


FIGURE 1 - CONTROL COMPLEX COOLING SYSTEM

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

ATTACHMENT B

**LICENSE AMENDMENT REQUEST #259, REVISION 0
Control Complex Cooling System**

No Significant Hazards Consideration Determination

No Significant Hazards Consideration Determination

Crystal River Unit 3 (CR-3) proposes to revise Improved Technical Specifications (ITS) 3.7.18, "Control Complex Cooling System," by adding a note to the Completion Time for Required Action A.2 that allows the Completion Time to be increased from 7 days to 35 days once for each Control Complex Cooling System train, and establish an expiration date of December 31, 2002 for applying the 35-day Completion Times. The note would also specify that the requirements of Limiting Condition for Operation (LCO) 3.0.4 are not applicable for Condition A during the requested 35-day Completion Time for each train. Bases Section B 3.7.18 will also be revised to reflect the proposed changes.

Florida Power Corporation (FPC) has reviewed the proposed revisions to ITS 3.7.18 and associated Bases Section B 3.7.18 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 Control Complex Cooling System is not an initiator of any design basis accident. The Control Complex Cooling System is designed to provide sufficient cooling to ensure operability of safety-related equipment located in the control room and other portions of the control complex under normal and accident conditions.

The proposed license amendment extends the Completion Time for restoring an inoperable Control Complex Cooling train from 7 days to 35 days on a one-time basis for each train to allow on-line refurbishment of the control complex chillers. The proposed amendment also specifies that the requirements of LCO 3.0.4 are not applicable to ITS 3.7.18 Condition A during the 35-day Completion Times. The design functions of the Control Complex Cooling System and the initial conditions for accidents that require the Control Complex Cooling System will not be affected by the change. The increased Completion Time requested by License Amendment Request (LAR) #259 results in slight increases in core damage frequency and core damage probability; however, these increases are well below values that are considered risk significant. Therefore, the change will not significantly 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 proposed amendment extends the Completion Time for restoring an inoperable Control Complex Cooling System train on a one-time basis for each train to allow on-line performance of maintenance activities that will improve chiller reliability. The proposed amendment will not result in changes to the design, physical configuration or operation of the plant. 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 license amendment increases the Completion Time for restoring an inoperable Control Complex Cooling System train from 7 days to 35 days on a one-time basis for each train. The proposed amendment also specifies that the requirements of Limiting Condition for Operation (LCO) 3.0.4 are not applicable to ITS 3.7.18 Condition A during the one-time 35-day Completion Times. The proposed changes will maintain operational flexibility while allowing on-line refurbishment of the control complex chillers to improve their reliability and extend their useful lifetimes, thus increasing the long-term margin of safety of the system.

The Control Complex Cooling System is designed to provide sufficient cooling to ensure operability of safety-related equipment located in the control room and other portions of the control complex under both normal and accident conditions. Either redundant train of the system is capable of performing this function; therefore, as long as one train is available, the margin of safety is maintained. Waiving the requirements of LCO 3.0.4 while the requested 35-day Completion Times are in effect will not impact the availability of the redundant system train, backup systems, or required support systems. In addition, since the heat removal requirements for the control room and other vital heat loads in the control complex are the same in Mode 1 as they are in Mode 3, allowing the plant to escalate Modes while chiller repairs are in progress will not impact the ability of the Control Complex Cooling System to fulfill its intended safety function. During the time that the required maintenance activities are being performed on each chiller, the availability of redundant system components will be maximized by administratively controlling preventive maintenance and surveillance activities performed on the Control Complex Cooling System and required support systems. Defense-in-depth measures will also be implemented to ensure the availability of temporary and permanently installed backup systems capable of providing cooling to the control room and the other vital equipment areas in the control complex. Although the increased Completion Time requested by LAR #259 results in a loss of redundancy and slight increases in core damage frequency and core damage probability, these increases are well below values that are considered risk significant. Therefore, this change does not involve a significant reduction in the margin of safety.

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CRYSTAL RIVER UNIT 3

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ATTACHMENT C

**LICENSE AMENDMENT REQUEST #259, REVISION 0
Control Complex Cooling System**

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 (FPC) 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 (LAR).
2. The proposed changes revise the Completion Time for restoring an inoperable Control Complex Cooling System train on a one-time basis for each train from 7 days to 35 days, and specify that the requirements of Limiting Condition for Operation (LCO) 3.0.4 are not applicable during each 35-day Completion Time. The Control Complex Cooling System does not interface with 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 change involves equipment that does not interface with radiologically contaminated systems. The proposed changes do not require 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

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ATTACHMENT D

**LICENSE AMENDMENT REQUEST #259, REVISION 0
Control Complex Cooling System**

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

Strikeout / Shadow Format

Strikeout Text	Indicates deleted text
Shadowed text	Indicates added text

BASES

ACTIONS

A.1 (continued)

With one or more components inoperable such that the cooling capability equivalent to a single OPERABLE train is not available, the facility is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be immediately entered.

With one or more Control Complex Cooling trains inoperable and at least 100% cooling capability of a single OPERABLE train available, the inoperable components must be restored to OPERABLE status within 7 days*. In this Condition, the remaining Control Complex Cooling System equipment is adequate to maintain the control complex temperature. Adequate cooling capability exists when the control complex air temperature is maintained within the limits for the contained equipment and components. However, the overall reliability is reduced because additional failures could result in a loss of Control Complex Cooling System function. The 7 day Completion Time is based on the low probability of an event occurring requiring the Control Complex Cooling System and the consideration that the remaining components can provide the required capabilities.

*On a one-time basis, each Control Complex Cooling System train may be inoperable for up to 35 days to allow performance of chiller refurbishment activities. LCO 3.0.4 is not applicable during each of the one-time 35-day Completion Times. The ability to apply the one-time 35-day Completion Time to each Control Complex Cooling System train will expire on December 31, 2002.

B.1 and B.2

During movement of irradiated fuel, if the required Action and Completion Times of Condition A can not be met, the Control Complex Cooling System must be placed in operation immediately. This action ensures that the remaining Control Complex Cooling System components are available, and that any active failure will be readily detected.

An alternative to Required Action B.1 is to immediately suspend activities that could release radioactivity that might require the isolation of the control room. This places the plant in a condition that minimizes accident risk. This does not preclude the movement of fuel to a safe position.

C.1 and C.2

In MODE 1, 2, 3, or 4, if the inoperable Control Complex Cooling System component cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner without challenging unit systems.

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FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

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ATTACHMENT E

**LICENSE AMENDMENT REQUEST #259, REVISION 0
Control Complex Cooling System**

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

Revision Bar Format

3.7.18 PLANT SYSTEMS

3.7.18 Control Complex Cooling System

LCO 3.7.18 Two Control Complex Cooling trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4,
During movement of irradiated fuel assemblies.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. One or more trains inoperable.</p> <p><u>AND</u></p> <p>At least 100% of the cooling capability of a single OPERABLE Control Complex Cooling train available.</p>	<p>A.1 Ensure adequate cooling capability from the Control Complex Cooling system in operation.</p> <p><u>AND</u></p> <p>A.2 Restore Control Complex Cooling trains(s) to OPERABLE status.</p>	<p>Immediately</p> <p>7 days*</p>
<p>B. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies.</p>	<p>B.1 Place available Control Complex Cooling System in operation.</p> <p><u>OR</u></p> <p>B.2 Suspend movement of irradiated fuel assemblies.</p>	<p>Immediately</p> <p>Immediately</p>

(continued)

*On a one-time basis, each Control Complex Cooling System train may be inoperable for up to 35 days to allow performance of chiller refurbishment activities. LCO 3.0.4 is not applicable during each of the one-time 35-day Completion Times. The ability to apply the one-time 35-day Completion Time to each Control Complex Cooling System train will expire on December 31, 2002.

BASES

ACTIONS

A.1 (continued)

With one or more components inoperable such that the cooling capability equivalent to a single OPERABLE train is not available, the facility is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be immediately entered.

With one or more Control Complex Cooling trains inoperable and at least 100% cooling capability of a single OPERABLE train available, the inoperable components must be restored to OPERABLE status within 7 days*. In this Condition, the remaining Control Complex Cooling System equipment is adequate to maintain the control complex temperature. Adequate cooling capability exists when the control complex air temperature is maintained within the limits for the contained equipment and components. However, the overall reliability is reduced because additional failures could result in a loss of Control Complex Cooling System function. The 7 day Completion Time is based on the low probability of an event occurring requiring the Control Complex Cooling System and the consideration that the remaining components can provide the required capabilities.

*On a one-time basis, each Control Complex Cooling System train may be inoperable for up to 35 days to allow performance of chiller refurbishment activities. LCO 3.0.4 is not applicable during each of the one-time 35-day Completion Times. The ability to apply the one-time 35-day Completion Time to each Control Complex Cooling System train will expire on December 31, 2002.

B.1 and B.2

During movement of irradiated fuel, if the required Action and Completion Times of Condition A can not be met, the Control Complex Cooling System must be placed in operation immediately. This action ensures that the remaining Control Complex Cooling System components are available, and that any active failure will be readily detected.

An alternative to Required Action B.1 is to immediately suspend activities that could release radioactivity that might require the isolation of the control room. This places the plant in a condition that minimizes accident risk. This does not preclude the movement of fuel to a safe position.

C.1 and C.2

In MODE 1, 2, 3, or 4, if the inoperable Control Complex Cooling System component cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner without challenging unit systems.

(continued)

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR - 72

ATTACHMENT F

**LICENSE AMENDMENT REQUEST #259, REVISION 0
Control Complex Cooling System**

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Florida Power Corporation (FPC) in this document. Any other actions discussed in the submittal represent intended or planned actions by FPC. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Supervisor, Licensing and Regulatory Programs of any questions regarding this document or any associated regulatory commitments.

Commitment	Due Date
A portable 15-ton cooling unit will be staged and available to provide cooling for the control room if normal cooling capability is lost.	While recommended chiller repairs are in progress.
Annual preventative maintenance will be performed on the Appendix R Chilled Water System in accordance with CR-3 Preventative Maintenance Procedure PM-139, "HVAC Equipment Check and Service."	Prior to starting recommended chiller repairs.
Refresher training on the procedural guidance for aligning the Appendix R Chilled Water System to provide cooling to the Control Complex will be the conducted to ensure all appropriate personnel are prepared to promptly place the system in service, if required.	Prior to starting recommended chiller repairs.