



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

Ref: 10 CFR 50.90

June 28, 2001
3F0601-07

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

Subject: Crystal River Unit 3 - Contingency Letter of Commitment Regarding License Amendment Request #252, Revision 0, Once Through Steam Generator Tube Surveillance Program, Tube Repair Roll (Re-Roll) Process (TAC No. MB1519)

References:

1. FPC to NRC Letter, 3F0301-02, dated March 21, 2001, "License Amendment Request (LAR) #252, Revision 0, Once Through Steam Generator Tube Surveillance Program, Tube Repair Roll (Re-Roll) Process"
2. NRC to FPC Letter, 3N0501-12, dated May 31, 2001, "Crystal River Unit 3 Proposed License Amendment Request No. 252, Once-Through Steam Generator Tube Surveillance Program, Tube Repair Roll Process" (TAC No. MB1519)

Dear Sir:

The purpose of this letter is to provide the NRC with contingency regulatory commitments regarding the implementation of License Amendment Request (LAR) #252, Revision 0, "Once Through Steam Generator Tube Surveillance Program Tube Repair roll (Re-roll Process" (Reference 1).

In Reference 2, Florida Power Corporation (FPC) was informed that the NRC staff's review of Topical Report BAW-2374, Revision 1, "Risk Informed Assessment of Once-Through Steam Generator Tube Thermal Loads Due to Breaks in Reactor Coolant System Upper Hot Leg Large Bore Piping," may not be completed in time to support the FPC requested approval date of August 30, 2001, for LAR #252. The contents of Reference 2, including the need for regulatory commitments from Crystal River Unit 3 (CR-3) similar to those previously made by Arkansas Nuclear One, Unit 1, were discussed during a telephone conference with the NRC on June 7, 2001.

The following commitments are provided as a contingency to be implemented if NRC review and approval of Topical Report BAW-2374, Revision 1, is not completed prior to the LAR #252 requested approval date:

1. Following each inservice inspection of steam generator tubes but prior to returning the CR-3 steam generators to service, FPC will verbally notify the NRC of the following:
 - a. Number of tubes with circumferential cracking indications inboard of the roll repair.

- b. Number of tubes with circumferential cracking indications in the original roll region, including the zone adjacent to the tube-to-sheet seal weld if no re-roll is present.
 - c. Determination of the best-estimate total leakage that would result from an analysis of the limiting Large Break Loss-of-Coolant Accident (LBLOCA) based on as-found circumferential cracking in the original tube-to-tubesheet rolls, tube-to-tubesheet re-roll repairs, and the zones adjacent to the seal welds.
2. Demonstrate that the primary-to-secondary leakage following a LBLOCA, as described in Appendix A to Topical Report BAW-2374, Revision 1 is acceptable based on the as-found condition of the steam generators. This is required to demonstrate that adequate margin and defense-in-depth are maintained. For the purpose of this evaluation, "acceptable" means a best estimate of the leakage expected due to a LBLOCA where that leakage would not result in a significant increase of radionuclide release (e.g., in excess of 10 CFR 100 limits). A summary of this evaluation shall be provided to the NRC following completion of steam generator tube inservice inspection with the report required by Improved Technical Specification 5.7.2.e.

The commitments provided above do not affect the proposed Improved Technical Specification 5.6.2.10, the No Significant Hazards Consideration Determination or the Environmental Impact Evaluation provided in Reference 1. Additionally, these commitments will be terminated upon NRC approval of the aforementioned topical report.

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/lvc

Attachment

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

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 June, 2001, by Dale E. Young.



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

Lisa A Morris
Signature of Notary Public
State of Florida

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

Personally Known X -OR- Produced Identification _____

List of Regulatory Commitments

The following table identifies those actions committed to by Florida Power Corporation in this document. Any other actions discussed in the submittal represent intended or planned actions by Florida Power Corporation. 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.

ID Number	Commitment	Commitment Date
3F0601-07-1	<p>Following each inservice inspection of steam generator tubes but prior to returning the CR-3 steam generators to service, FPC will verbally notify the NRC of the following:</p> <ul style="list-style-type: none"> a. Number of tubes with circumferential cracking indications inboard of the roll repair. b. Number of tubes with circumferential cracking indications in the original roll region, including the zone adjacent to the tube-to-sheet seal weld if no re-roll is present. c. Determination of the best-estimate total leakage that would result from an analysis of the limiting Large Break Loss-of-Coolant Accident (LBLOCA) based on as-found circumferential cracking in the original tube-to-tubesheet rolls, tube-to-tubesheet re-roll repairs, and the zones adjacent to the seal welds. 	Prior to MODE 4
3F0601-07-2	<p>Demonstrate that the primary-to-secondary leakage following a LBLOCA, as described in Appendix A to Topical Report BAW-2374, Revision 1 is acceptable based on the as-found condition of the steam generators. This is required to demonstrate that adequate margin and defense-in-depth are maintained. For the purpose of this evaluation, "acceptable" means a best estimate of the leakage expected due to a LBLOCA where that leakage would not result in a significant increase of radionuclide release (e.g., in excess of 10 CFR 100 limits). A summary of this evaluation shall be provided to the NRC following completion of steam generator tube inservice inspection with the report required by Improved</p>	90-Days after breaker closure following restart