



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

Ref: 10 CFR 50.90

September 7, 2001
3F0901-05

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

Subject: Crystal River - Unit 3 – Editorial Corrections to License Amendment Requests #262, #266 and #267

- References:
1. FPC to NRC letter, 3F0801-03, dated August 28, 2001, Crystal River – Unit 3 – License Amendment Request #262, Revision 2, “Alternative Source Term and Control Room Emergency Ventilation System” (TAC No. MB0241)
 2. FPC to NRC letter, 3F0601-08, dated June 27, 2001, Crystal River Unit 3 –Submittal of Editorial Correction to License Amendment Request #266, Revision 0, “Safety Limit Violations and Administrative Controls”
 3. FPC to NRC letter, 3F0201-01, dated February 21, 2001, License Amendment Request #266, Revision 0, Safety Limit Violations and Administrative Controls
 4. FPC to NRC letter, 3F0601-06, dated June 20, 2001, Crystal River Unit 3 – License Amendment Request #267, Revision 2, Supplemental Risk-Informed Information in Support of License Amendment Request #267
 5. NRC to FPC letter, 3N0801-14, dated August 30, 2001, Crystal River Unit 3 – Issuance of Amendment Regarding Containment Leakage Rate Testing Program (TAC NO. MB1349)

Dear Sir:

Florida Power Corporation (FPC) hereby submits editorial corrections for License Amendment Requests (LARs) submitted in References 1, 3 and 4. The editorial changes to References 1 and 4 are corrections of typographical errors to the numbering of Improved Technical Specifications (ITS) 5.6.2.19. The typographical errors for Reference 4 were issued in Amendment 197 (Reference 5). The editorial change to Reference 3 is being made to match the wording of NUREG-1430, Revision 2, Standard Technical Specifications Babcock and Wilcox Plants. The editorial corrections in this letter supersede the request made in Reference 2.

These editorial corrections do not change the associated Environmental Impact Evaluations or the No Significant Hazards Consideration Determinations for the referenced LARs.

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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,


Sherry L. Bernhoft
Manager, Regulatory Affairs

SLB/pei

Attachments:

- A. Description and Justification for Proposed Changes
- B. LAR #262 Proposed Revised Improved Technical Specifications Page
- C. LAR #266 Proposed Revised Improved Technical Specifications Pages
- D. Amendment 197 (LAR #267) Proposed Revised Improved Technical Specifications Page

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

STATE OF FLORIDA

COUNTY OF CITRUS

Sherry L. Bernhoft states that she is the Manager, Regulatory Affairs, Crystal River Nuclear Plant for Progress Energy; that she 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 her knowledge, information, and belief.

Sherry L. Bernhoft

Sherry L. Bernhoft
Manager, Regulatory Affairs

The foregoing document was acknowledged before me this 7th day of September, 2001, by Sherry L. Bernhoft.

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 Known X -OR- Produced Identification _____

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT - 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

ATTACHMENT A

Description and Justification for Proposed Changes

Description and Justification of Proposed Changes

The two paragraphs of Improved Technical Specifications (ITS) 5.6.2.19 located on page 5.0-23A should be labeled “c” and “d.” In License Amendment Request (LAR) #262, these paragraphs were lettered “a” and “b.” In LAR #267 (and issued in License Amendment 197), these same paragraphs were labeled “e” and “f.” No change to the lettering of these paragraphs was intended in either LAR. The corrected pages for these LARs are included in Attachments B and D, respectively. Please note that the corrected page in Attachment B for LAR #262 includes ITS changes approved in Amendment 197 (LAR #267) that were not included in the original submittal because the changes were still pending approval.

Attachment C includes revisions to changes requested in LAR #266 to ITS 5.6.2.17, page 5.0-22. In the second paragraph, the word “involve” is replaced by the word “require.” In paragraph b, the phrase “requires a License Amendment as defined in 10 CFR 50.59” is changed to “requires NRC approval pursuant to 10 CFR 50.59.” These changes revise the wording to match the wording in NUREG-1430, Revision 2, Standard Technical Specifications Babcock and Wilcox Plants. This change is purely editorial for consistency with the NUREG and does not change the intent of the proposed change.

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

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ATTACHMENT B

LICENSE AMENDMENT REQUEST #262

Proposed Revised Improved Technical Specifications Page

5.6 Procedures, Programs and Manuals

5.6.2.19 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) (continued)

- c. The reactor vessel pressure and temperature limits, including those for heatup and cooldown rates, shall be determined so that all applicable limits (e.g., heatup limits, cooldown limits, and inservice leak and hydrostatic testing limits) of the analysis are met.
- d. The PTLR, including revisions or supplements thereto, shall be provided upon issuance for each reactor vessel fluency period.

5.6.2.20 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program," dated September 1995, as modified by the following exception:

- 1. NEI 94-01-1995, Section 9.2.3: The first Type A test performed after the November 7, 1991 Type A test shall be performed no later than November 6, 2006.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 54.2 psig. The containment design pressure is 55 psig.

The maximum allowable primary containment leakage rate, L_a , at P_a , shall be 0.25% of primary containment air weight per day.

Leakage Rate acceptance criteria are:

- 1. Containment leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the Type B and Type C Tests and $\leq 0.75 L_a$ for Type A Tests.
- 2. Air lock testing acceptance criteria are:
 - a. Overall air lock leakage range is $\leq 0.05 L_a$ when tested at $\geq P_a$.
 - b. For each door, leakage rate is $\leq 0.01 L_a$ when tested at ≥ 8.0 psig.

The provisions of SR 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

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ATTACHMENT C

LICENSE AMENDMENT REQUEST #266

Proposed Revised Improved Technical Specifications Pages

Strikeout Text	Indicates deleted text
Shadowed text	Indicates added text

5.6 Procedures, Programs and Manuals

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 ~~require~~ 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 NRC approval pursuant to~~ 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

(continued)

5.7 Procedures, Programs and Manuals

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 require 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 NRC approval pursuant to 10 CFR 50.59.

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

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(continued)

FLORIDA POWER CORPORATION

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ATTACHMENT D

AMENDMENT 197 (LAR #267)

Proposed Revised Improved Technical Specifications Page

5.6 Procedures, Programs and Manuals

5.6.2.19 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) (continued)

- c. The reactor vessel pressure and temperature limits, including those for heatup and cooldown rates, shall be determined so that all applicable limits (e.g., heatup limits, cooldown limits, and inservice leak and hydrostatic testing limits) of the analysis are met.
- d. The PTLR, including revisions or supplements thereto, shall be provided upon issuance for each reactor vessel fluency period.

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- 1. NEI 94-01-1995, Section 9.2.3: The first Type A test performed after the November 7, 1991 Type A test shall be performed no later than November 6, 2006.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 54.2 psig. The containment design pressure is 55 psig.

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Leakage Rate acceptance criteria are:

- 1. Containment leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the Type B and Type C Tests and $\leq 0.75^a L_a$ for Type A Tests.
- 2. Air lock testing acceptance criteria are:
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 - b. For each door, leakage rate is $\leq 0.01 L_a$ when tested at ≥ 8.0 psig.

The provisions of SR 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.