



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

Ref: 10 CFR 50.90

September 28, 2001
3F0901-09

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

Subject: Crystal River Unit 3 – Clarifications to Safety Evaluation Report (SER) to License Amendment No. 198 (TAC No. MB1519)

References:

1. NRC to FPC letter, 3N0901-02, dated September 10, 2001, Crystal River Unit 3 – Issuance of Amendment Regarding Re-roll Repair for Once Through Steam Generator Tubing (TAC No. MB1519)
2. FPC to NRC letter, 3F0601-07, dated June 28, 2001, 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)
3. FPC to NRC letter, 3F0301-02, dated March 21, 2001, License Amendment Request #252, Revision 0, Once Through Steam Generator Tube Surveillance Program, Tube Repair Roll (Re-Roll) Process

Dear Sir:

The purpose of this letter is to provide clarifications regarding the Safety Evaluation Report (SER) to License Amendment No. 198 for Crystal River Unit 3 (CR-3), Reference 1.

Florida Power Corporation's (FPC's) review of the SER noted several inconsistencies between the SER and the information provided by FPC in References 2 and 3. The inconsistencies are noted below.

Page 5 of the SER, Section 3.2 states:

“In addition, a post-slip leak rate is applied without taking credit for the original roll or the tube-to-tubesheet weld.”

For CR-3, Appendix B of Topical Report BAW-2303P, Revision 4, “OTSG Repair Roll Qualification Report,” clarifies that no re-rolls placed in qualified locations are predicted to slip during faulted accident transients. Therefore, as long as the re-rolls are placed in the specified qualified locations, the following conclusions can be drawn:

- At CR-3 slippage is not a concern.
- Non-slip leak rates can be used.
- No inspection of the seal weld is required.

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Page 13 of the SER, Section 3.4.1.6 states:

"The SG tubes will continue to be inspected and plugged or repaired as required by the CR-3 ITS. This will include inspections of the pressure boundary components, including the original tube-to-tubesheet roll transition region and fillet weld or the tube-to-tubesheet reroll transition region, as appropriate."

The statement above implies that the CR-3 Once Through Steam Generator (OTSG) Tube Inspection Program requires inspection of the OTSG tube-to-tubesheet seal welds. The OTSG Tube Inspection Program does not require inspection of the seal welds. The qualification testing described in Topical Report BAW-2303P, Revision 4, took no credit for the seal weld. Section 5.2.4 of the topical report states:

"The purpose of the slip tests was to verify that the repair roll could withstand axial loads during normal operation (NOP) and accident conditions without benefit from the original roll or the tube-to-tubesheet weld."

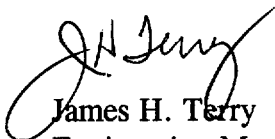
Another minor inconsistency includes statements throughout the SER mentioning FPC as having performed specific aspects of the re-roll qualification program. FPC was a participant of the qualification program performed by Framatome Technologies, Inc. as a member of the B&W Owners Group.

These clarifications do not change the associated Environmental Impact Evaluation, the No Significant Hazards Consideration Determination, or the issued Improved Technical Specification pages.

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,



James H. Terry
Engineering Manager

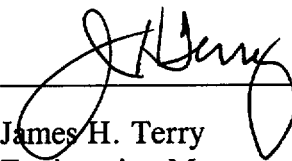
JHT/lvc

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

STATE OF FLORIDA

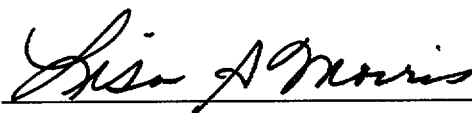
COUNTY OF CITRUS

James H. Terry states that he is the Engineering Manager, 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.



James H. Terry
Engineering Manager

The foregoing document was acknowledged before me this 28th day of September, 2001, by James H. Terry.



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 _____