



Florida Power

A Progress Energy Company

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

Ref: 10 CFR 50.90

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3F1201-08

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

Subject: Crystal River Unit 3 – Clarifications to the Safety Evaluation for License Amendment No. 199, “Alternative Source Term and Control Room Emergency Ventilation System” (TAC No. MB0241)

- References:
1. FPC to NRC letter, 3F1000-08, dated October 3, 2000, License Amendment Request #262, Revision 0, “Alternative Source Term and Control Room Emergency Ventilation System”
 2. NRC to FPC letter, 3N0501-08, dated May 24, 2001, “Crystal River Unit 3 – Request for Additional Information RE: Proposed License Amendment Request No. 262, Revision 0, Alternative Source Term and Control Room Emergency Ventilation System” (TAC No. MB0241)
 3. FPC to NRC letter, 3F0601-03, dated June 14, 2001, Crystal River Unit 3 - License Amendment Request #262, Revision 1, and Response to NRC Request for Additional Information RE: License Amendment #262, Revision 0, “Alternative Source Term and Control Room Emergency Ventilation System” (TAC No. MB0241)
 4. FPC to NRC letter, 3F0801-03, dated August 28, 2001, License Amendment Request #262, Revision 2, “Alternative Source Term and Control Room Emergency Ventilation System” (TAC No. MB0241)
 5. NRC to FPC letter, 3N0901-04, dated September 17, 2001, “Crystal River Unit 3 – Issuance of Amendment Regarding Alternative Source Term and Control Room Ventilation System (TAC No. MB0241)

Dear Sir:

The purpose of this letter is to provide suggested changes to the Safety Evaluation (SE) for License Amendment No. 199 for Crystal River Unit 3 (CR-3). The proposed changes are intended to improve the clarity of the SE. Florida Power Corporation (FPC) has evaluated the proposed clarifications provided in this submittal and has determined that they do not change any of the conclusions regarding the acceptability of the ITS changes associated with License Amendment No. 199 or full implementation of the alternative source term at CR-3.

*Rec'd
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In Reference 1, FPC submitted License Amendment Request (LAR) #262, Revision 0, requesting full implementation of the alternative source term and revisions to Improved Technical Specifications (ITS) 3.3.16, "Control Room Isolation – High Radiation," ITS 3.7.12, "Control Room Emergency Ventilation System (CREVS)," ITS 3.7.18, "Control Complex Cooling System," and ITS 5.6.2.12, "Ventilation Filter Testing Program (VFTP)." In response to questions raised during the extensive NRC review of the original submittal (Reference 2), and staff comments during conference calls, FPC subsequently submitted LAR #262, Revision 1 (Reference 3) and LAR #262, Revision 2 (Reference 4). These revisions proposed additional changes to ITS 3.7.12, ITS Surveillance Requirement 3.7.12.4, added a new ITS Section 5.6.2.21, "Control Complex Habitability Envelope Integrity Program," and adopted Technical Specification Task Force Traveler #287 (TSTF-287) as the basis of the request.

By Reference 5, the NRC issued License Amendment No. 199, which approved full implementation of the alternative source term and the ITS changes proposed by LAR #262, Revision 0, as supplemented by LAR #262, Revisions 1 and 2. In reviewing the SE for License Amendment No. 199, FPC has identified two sections of the SE that it believes require clarification.

1. Section 3.4, Hazardous Chemical Analysis Evaluation

As discussed in the Toxic Gas Report, submitted as part of Reference 4, FPC has implemented administrative controls that limit the amount of chlorine and sulfur dioxide that could potentially be stored at the Helper Cooling Towers, and has replaced the chlorine and sulfur dioxide previously used at Crystal River Units 4 and 5 with sodium hypochlorite and sodium bisulfate. These controls and modifications eliminate the potential for any toxic gas release, including a transportation accident, that would require automatic isolation of the CR-3 Control Complex by the toxic gas detectors.

Based on the above, FPC recommends rewording the first and third paragraphs of this section to read as follows:

"At CR-3 the presence of chlorine and sulfur dioxide pose potential liability to the habitability of the control room. Up to three tons of chlorine and 17 tons of sulfur dioxide can potentially be stored at the Helper Cooling Tower site, which is located 3400 feet from the air inlet to the Unit 3 CCHE. The gaseous chlorine and sulfur dioxide previously stored at the Crystal River Units 4 and 5 have been replaced with sodium hypochlorite and sodium bisulphate."

Delete the following sentence in the third paragraph:

"However, for the release of chlorine during the transportation accident, habitability of the control room has to be protected by the automatic CCHE isolation activated by a signal from the chlorine monitor."

2. Section 3.6, Conformance to TSTF-287 Evaluation

The first sentence of the third paragraph, as currently written, implies a positive pressure control room emergency ventilation system. FPC recommends changing the sentence to read as follows:

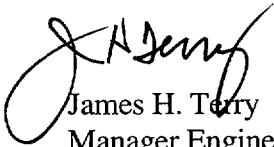
“The proposed changes would allow 24 hours (during Modes 1, 2, 3 or 4) to restore the main control building boundary to OPERABLE status before requiring the unit to perform an orderly shutdown and would also allow intermittent opening of the control room boundary under administrative control.”

This change will ensure consistency with the wording of ITS 3.7.12, Condition B and Bases Section B 3.7.12.

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