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DMB 016

Docket No. 50-302

DISTRIBUTION

Mr. Walter S. Wilgus
Vice President, Nuclear Operations
Florida Power Corporation
ATTN: Manager, Nuclear Licensing
& Fuel Management
P. O. Box 14042; M.A.C. H-2
St. Petersburg, Florida 33733

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Dear Mr. Wilgus:

SUBJECT: CRYSTAL RIVER UNIT 3 - TECHNICAL SPECIFICATION
CHANGE REQUEST NO. 103 - REQUEST FOR REVISION

Florida Power Corporation (FPC) submitted a request to revise the Crystal River Unit 3 Technical Specifications (TSs) on April 14, 1983 and supplemented this request on December 13, 1983. The change responded to the NRC's Generic Letters 82-17 and 82-23 dealing with audit frequencies of various administrative controls. Other changes to the Administrative Controls section of the TSs were also requested. A notice of the staff's proposed no significant hazards consideration finding was published in the Federal Register on February 24, 1984.

The staff has completed its Safety Evaluation of the subject amendment request and has identified a number of revisions which are recommended prior to issuance of the TS amendment. These recommended revisions are as follows:

1. Under "Training and Plant Review Committee"

FPC requested addition of two more "at large" Plant Review Committee members (for a total of four) but neglected to increase the number of committee members needed to constitute a quorum by the same number. To assure continued compliance with the intent of this committee, the quorum requirement should also be raised. It is noted that other operating B&W plant TSs do not provide for any "at large" PRC members.

2. Under "Nuclear General Review Committee, Review Requirements"

A total rewording of these requirements was proposed by FPC to provide consistency with ANSI-N18.7. The staff has reviewed the revised rewording and recommends the wording of requirement 6.5.2.8.c be changed as discussed in the attached Safety Evaluation in order to be consistent with Regulatory Guide 1.33 or to delete words which serve no purpose as applied to Crystal River and could therefore give rise to confusion or misinterpretation.

3. Under "Procedures"

The staff recommends revising sections 6.8.1.a and 6.8.2.1.a as discussed in the attached Safety Evaluation. The former section should be revised to be consistent with the current QA Plan whereas the latter section, as proposed, would create confusion regarding what is considered a "safety-related plant modification".

4. Under "Snubbers"

We recently informed FPC that no action would be taken in response to TS Change Request No. 115 (dated March 12, 1984) regarding snubber inspections because a subsequent unplanned maintenance outage made the inspection relief unnecessary. However, the change request also proposed corrections to the classification of 31 snubbers on Table 3.7-3. Since these reclassifications are corrections to administrative errors in the present TS, FPC should resubmit those corrections as part of this amendment.

The staff's Safety Evaluation discussing all changes proposed as part of your Change Request No. 103 is attached for your information. Marked copies of the affected TS pages are also enclosed for your information. Prior to issuance of a license amendment, the staff will require a revision to your request to address the above items and the revised request must be noticed in the Federal Register with allowance of a 30-day comment period.

Should you have questions, please contact the NRC Project Manager assigned to Crystal River Unit 3.

Sincerely,

ORIGINAL SIGNED BY
JOHN F. STOLZ

John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

Enclosures:

- 1. Safety Evaluation
- 2. Marked-up TS Pages

cc w/enclosures:
See next page

ORB#4:DL
RHernan;cf
4/30/84

ORB#4:DL
JStolz
54/1/84

Crystal River Unit No. 3
Florida Power Corporation

50-302

cc w/enclosure(s):

Mr. Wilbur Langely, Chairman
Board of County Commissioners
Citrus County
Inverness, Florida 36250

Regional Radiation Representative
EPA Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Mr. R. W. Neiser, Senior
Vice President and General
Counsel
Florida Power Corporation
P. O. Box 14042
St. Petersburg, Florida 33733

Administrator
Department of Environmental Regulation
Power Plant Siting Section
State of Florida
2600 Blair Stone Road
Tallahassee, Florida 32301

Attorney General
Department of Legal Affairs
The Capitol
Tallahassee, Florida 32304

Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission, Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Mr. Robert B. Borsum
Babcock & Wilcox
Nuclear Power Generation Division
Suite 220, 7910 Woodmont Avenue
Bethesda, Maryland 20814

Mr. Tom Stetka, Resident Inspector
U.S. Nuclear Regulatory Commission
Route #3, Box 717
Crystal River, Florida 32629

Nuclear Plant Manager
Florida Power Corporation
P. O. Box 219
Crystal River, Florida 32629

Bureau of Intergovernmental Relations
660 Apalachee Parkway
Tallahassee, Florida 32304

Uray Clark, Administrator
Radiological Health Services
Department of Health and
Rehabilitative Services
1323 Winewood Blvd.
Tallahassee, Florida 32301

MAR 30 1984

ENCLOSURE 1

SAFETY EVALUATION
PROPOSED AMENDMENT TO CRYSTAL RIVER UNIT 3
TECHNICAL SPECIFICATION
DOCKET NO. 50-302

Introduction

Florida Power Corporation (FPC), the licensee of the Crystal River Unit 3 Steam Electric Plant, proposed changes to the Operating License (No. DPR-72) in a letter written to this Commission, dated December 13, 1983. The Amendment to License DPR-72 consists of administrative changes to the Technical Specifications.

ADDITION OF HYDRAULIC SNUBBERS

Discussion and Evaluation

FPC proposed changes to the Technical Specifications, Table 3.7-3, "Safety Related Hydraulic Snubbers," which would add six new safety-related hydraulic snubbers to the Table.

The proposed FPC changes to Table 3.7-3, of their Technical Specification will update their current position. The addition of six more hydraulic snubbers is being made in accordance with Specification 3.7.9.1 which states that snubbers may be added to safety-related systems without a prior License Amendment provided that a revision to table 3.7-3 is included with the next License Amendment request. LRH-59, 60, 68 and 69, RCH-530 and 531 were added to safety-related systems during Refuel IV and should be included in Table 3.7-3.

Conclusion

The proposed change is accepted as submitted and amends Table 3.7-3.

PRESENT CORPORATE ORGANIZATIONAL STRUCTURE

Discussion and Evaluation

FPC proposed changes to the Administrative Controls, Figure 6.2-1 "Corporate Organization" to indicate the present corporate organizational structure and add a footnote stating that the corporate organization may be changed without prior License Amendment provided that a revision to Figure 6.2-1 is included with the next License Amendment request.

The proposed change is administrative in nature and would allow the licensee to update Technical Specification 6.2.1 to agree with the current corporate organizational structure.

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MAR 30 1984

Conclusion

The proposed change is accepted as submitted and amends the corresponding specification.

FACILITY ORGANIZATIONDiscussion and Evaluation

FPC proposed changes to the Administrative Controls, Figure 6.2-2 "Facility Organization" to show the general responsibilities of each department rather than every position in each department and add a footnote similar to that added to Figure 6.2-1.

The proposed changes are administrative in nature and listing departmental responsibilities rather than the positions within each department will help clarify the responsibilities of each group and the interdepartmental relationships.

Conclusion

The proposed change is accepted as submitted and amends the corresponding specification.

TRAINING AND PLANT REVIEW COMMITTEEDiscussion and Evaluation

FPC proposed changes to the Administrative Controls as follows:

- Technical Specification 6.4, change "Nuclear Plant Training Manager" and "Nuclear Plant Manager" to "Director, Site Nuclear Operations."
- Technical Specification 6.5.1.2, update the Plant Review Committee (PRC) members title to their current titles and add an additional two "At Large" members to the list of PRC members.

The proposed changes are administrative in nature and will update Technical Specification 6.4 and Technical Specification 6.5.1.2 to concur with current management structure and title. However, the addition of two more PRC members "At Large" could lead to the situation of diluting the intent of the Standard Technical Specifications. The Standard Technical Specifications defines the minimum quorum to be a chairman and four members including alternates and does not allow any members "At Large". We do not agree with this proposed change as stated; however, we will allow the addition of two members "At Large" provided the minimum quorum stated in the Crystal River Unit 3 Technical Specifications for the PRC is increased by two more members (i.e., a Chairman and Seven Members).

MAR 30 1984

Conclusion

Based on the reason as stated in the FPC submittals the intent of the change was to increase the number of voting members available for a meeting; therefore, it is determined that the approved Technical Specification should reflect that a chairman and seven members be required for a minimum quorum. The other proposed changes are accepted as submitted and are incorporated into the Technical Specification.

PLANT REVIEW COMMITTEE RESPONSIBILITIESDiscussion and Evaluation

FPC proposed a change to the Administrative Controls of Technical Specification 6.5.1.6.e by replacing "preparation and forwarding of reports" with "review of reports."

Changing PRC responsibility to review of Technical Specification violations clarifies the role of the PRC in the submittal process concerning Technical Specification violations and should continue to assure that proper evaluations and recommendations concerning these violations are performed. This change does not involve a significant hazard consideration.

Conclusion

The proposed change is accepted as submitted and is incorporated into the Technical Specifications.

NUCLEAR GENERAL REVIEW COMMITTEE QUALIFICATIONSDiscussion and Evaluation

FPC proposed a change to the Administrative Controls, Technical Specification 6.5.2.3 which would add "or the equivalent" after "Bachelor of Science in Engineering or related field" in both parts a and b.

The proposed Nuclear General Review Committee (NGRC) membership qualifications will allow FPC to equate adequate experience to a degree, otherwise highly qualified individuals may be excluded from NGRC membership. To include these non-degreed individuals, with substantial expertise, in the NGRC can potentially increase the effectiveness and quality of this committee. This change does not involve a significant hazard consideration.

Conclusion

The proposed change is accepted as submitted and is incorporated into the Technical Specifications.

MAR 30 1984

NUCLEAR GENERAL REVIEW COMMITTEE, REVIEW REQUIREMENTSDiscussion and Evaluation

FPC proposed changes to the Administrative Controls, Technical Specification 6.5.2.8 which would update the NGRC review requirements to concur with ANSI N18.7, 1972 (Administrative Controls for Nuclear Power Plants).

ANSI N18.7, 1972 has been endorsed by the NRC in Regulatory Guide 1.33 and FPC has stated compliance to this standard in their FSAR. The NRC Staff recommends that the word "Proposed" be inserted as the first word in Item c.

The NRC Staff has determined that the statement "except in those cases where the change is identical to a previously reviewed proposed change" be deleted from Item C. The Staff can see no reason for its intended use or why such a statement is required.

In addition, the staff recommends deleting the words "relating to nuclear safety" from Item C. If the changes involve the Technical Specifications or License Amendments then by definition they are related to nuclear safety therefore the words serve no purpose.

Conclusion

With the modifications required by the Staff the submitted administrative change to the specification is accepted and amends the existing specification.

NUCLEAR GENERAL REVIEW COMMITTEE AUDITSDiscussion and Evaluation

FPC proposed changes to the Administrative Controls, Technical Specification 6.5.2.9 which would revise the Emergency Plan, Security Plan and Fire Protection Plan auditing frequency from 24 months to 12 months. This change is required by 10 CFR 73.40(d).

Conclusion

The proposed change is accepted as submitted and is incorporated into the Technical Specifications.

PROCEDURESDiscussion and Evaluation

FPC proposed changes to the Administrative Controls, Technical Specification 6.8 which would add the heading "Scope" for 6.8.1 and the heading "Review Process" for 6.8.2. FPC also proposed to add the words "safety-related" regarding plant modifications and to delete approval responsibility for the PRC in Technical Specification 6.8.2.a leaving only review responsibility with the PRC and approval of the procedures with the Nuclear Plant Manager.

MAR 30 1984

The NRC Staff recommends that Technical Specification 6.8.1.a. be updated to comply with the current QA Plan as stated in the FPC, FSAR under "Florida Power Corporation Quality Program Commitments."

The NRC Staff is concerned that the licensee did not provide adequate justification for adding the words "safety related" to Technical Specification 6.8.2.1.a and that important procedures would not receive adequate review due to misinterpretation by the licensee.

Therefore, the NRC Staff has determined that the following rewording for 6.8.2.1.a would be preferred:

"The Radiological Emergency Response Plan(s), Security Plan, Fire Protection Plan and implementing procedures, Administrative Instructions, and those test procedures associated with plant modifications for equipment or systems whose operations are governed by the Technical Specifications or licensed conditions shall be reviewed by the PRC and approved by the Nuclear Plant Manager prior to implementation."

These revisions to Technical Specification 6.8 will help to clarify the scope and reviewing process of FPC procedures. This change does not involve a significant hazard consideration.

Conclusion

The proposed changes are accepted as modified by the staff and are incorporated into the Technical Specifications.

MONTHLY OPERATING REPORT

Discussion and Evaluation

FPC proposed to update Administrative Controls, Technical Specifications 6.9.1.6 to specify the correct NRC address.

Conclusion

The proposed change is accepted as submitted and is incorporated into the Technical Specifications.

Table 3.7-3

SAFETY RELATED HYDRAULIC SNUBBERS*

<u>SNUBBER NO.</u>	<u>SYSTEM SNUBBER INSTALLED ON, LOCATION** AND ELEVATION</u>		<u>ACCESSIBLE OR INACCESSIBLE (A or I)</u>	<u>HIGH RADIATION ZONE**** (Yes or No)</u>	<u>ESPECIALLY DIFFICULT TO REMOVE (Yes or No)</u>
Post Accident Venting System					
LRH-59	AB	160'- 10"	A	No	No
LRH-60	AB	160'- 10"	A	No	No
LRH-68	AB	161'- 0"	A	No	No
LRH-69	AB	161'- 0"	A	No	No

CRYSTAL RIVER - UNIT 3

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Additionally, Florida Power Corporation requests that the following snubbers be classified as "inaccessible" instead of "accessible" as is the current case:

- | | | | |
|---------|---------|---------|---------|
| EFH-92 | FWH 154 | FWH-167 | MSH-212 |
| EFH-93 | FWH-155 | FWH-169 | MSH-213 |
| EFH-106 | FWH-156 | MSH-125 | MSH-227 |
| EFH-110 | FWH-157 | MSH-126 | MSH-232 |
| EFH-144 | FWH-158 | MSH-205 | MSH-240 |
| FWH-149 | FWH-162 | MSH-206 | |
| FWH-153 | FWH-166 | MSH-207 | |

The following snubbers should be classified as "accessible" snubbers instead of "inaccessible":

- DHH-661
- DHR-18
- DHR-31
- DHR-37
- DHR-49

Made following changes (see TS change request No. 115) to table 3.7-3 on appropriate pages.

MAR 30 1984

ADMINISTRATIVE CONTROLS6.3 FACILITY STAFF QUALIFICATIONS

- 6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Chemistry and Radiation Protection Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the Operations Technical Advisor, who shall have a Bachelor's degree, or the equivalent, in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents.

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Director, Site Nuclear Operations and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.
- 6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Director, Site Nuclear Operations and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976, except for Fire Brigade training sessions which shall be held at least quarterly.

6.5 REVIEW AND AUDIT6.5.1 PLANT REVIEW COMMITTEE (PRC)FUNCTION

- 6.5.1.1 The Plant Review Committee shall function to advise the Nuclear Plant Manager on all matters related to nuclear safety.

COMPOSITION

- 6.5.1.2 The Plant Review Committee shall be composed of the:

Chairman: Nuclear Plant Operations Superintendent
 Member: Nuclear Maintenance Superintendent
 Member: Nuclear Security and Special Projects Superintendent
 Member: Nuclear Compliance Supervisor
 Member: Nuclear Chem/Rad Protection Superintendent
 Member: Nuclear Plant Engineering Superintendent
 Member: Nuclear Safety & Reliability Superintendent
 Member: At Large (Designated by Chairman)
 Member: At Large (Designated by Chairman)
 Member: At Large (Designated by Chairman)
 Member: At Large (Designated by Chairman)

*must also raise
the required quorum
by 2 people in § 6.5.1.5.*

ALTERNATES

- 6.5.1.3 All alternate members shall be appointed in writing by the PRC Chairman to serve on a temporary basis; no more than two alternates shall participate as voting members in PRC activities at any one time.

MEETING FREQUENCY

- 6.5.1.4 The PRC shall meet at least once per calendar month and as convened by the PRC Chairman or his designated alternate.

MAR 30 1984

ADMINISTRATIVE CONTROLSQUORUM

- 6.5.1.5 A quorum of the PRC shall consist of the Chairman or his designated alternate and ~~five~~ members including alternates.

RESPONSIBILITIES*seven*

- 6.5.1.6 The Plant Review Committee shall be responsible for:
- a. Review of 1) all procedures and changes thereto as required by Specification 6.8.2, 2) any other proposed procedures or changes thereto as determined by the Nuclear Plant Manager to affect nuclear safety.
 - b. Review of all proposed tests and experiments that affect nuclear safety.
 - c. Review of all proposed changes to the Appendix "A" Technical Specifications.
 - d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
 - e. Investigation of all violations of the Technical Specifications including the review of reports covering evaluation and recommendations to prevent recurrence to the Vice President, Nuclear Operations and to the Chairman of the Nuclear General Review Committee.
 - f. Review of events requiring 24-hour written notification to the Commission.
 - g. Review of facility operations to detect potential nuclear safety hazards.
 - h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Nuclear General Review Committee.
 - i. Review of the Plant Security Plan and implementing procedures.
 - j. Review of the Emergency Plan and implementing procedures.

MAR 30 1984

ADMINISTRATIVE CONTROLSCONSULTANTS

- 6.5.2.5 Consultants shall be utilized as determined by the NGRC Chairman to provide expert advice to the NGRC.

MEETING FREQUENCY

- 6.5.2.6 The NGRC shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once per six months thereafter.

QUORUM

- 6.5.2.7 A quorum of NGRC shall consist of the Chairman or his designated alternate and five additional NGRC members, including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

REVIEW

- 6.5.2.8 The NGRC shall review:
- a. Safety evaluations of changes to the facility, changes in procedures, and tests and experiments not described in the Safety Analysis Report, which were completed without prior NRC approval.
 - b. Proposed changes in the facility, changes in procedures or proposed tests or experiments which may involve an unreviewed safety question.
 - c. ^{Proposed} Changes in the Technical Specifications or license amendments relating to nuclear safety prior to implementation, except in those cases where the change is identical to a previously reviewed proposed change.

Delete →

Delete →
 - d. Violations, deviations and reportable events, which require reporting to the Nuclear Regulatory Commission in writing within 24 hours. This review should include results of investigations and recommendations resulting from such investigations.
 - e. Any other matter involving safe operation of the plant which an independent reviewer deems appropriate for consideration, or which is referred to the reviewers by members of Nuclear Operations staff or by other functional organizational units within Florida Power Corporation.
 - f. Reports and meeting minutes of the Plant Review Committee.

ADMINISTRATIVE CONTROLS6.7 SAFETY LIMIT VIOLATION

- 6.7.1 The following actions shall be taken in the event a Safety Limit is violated:
- The facility shall be placed in at least HOT STANDBY within one hour.
 - The Safety Limit violation shall be reported to the Commission, the Vice President, Nuclear Operations and to the NGRC within 24 hours.
 - A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PRC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures and (3) corrective action taken to prevent recurrence.
 - The Safety Limit Violation Report shall be submitted to the Commission, the NGRC and the Vice President, Nuclear Operations within 14 days of the violation.

6.8 PROCEDURES

6.8.1 SCOPE

Written procedures shall be established, implemented and maintained covering the activities referenced below:

- The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972. *correct to agree with current QA plan (i.e. Revision 2, February 1977)*
- Refueling operations.
- Surveillance and test activities of safety related equipment.
- Security Plan implementation.
- Emergency Plan implementation.
- Fire Protection Program implementation.
- Systems Integrity Program implementation.
- Iodine Monitoring Program implementation.

6.8.2 REVIEW PROCESS

6.8.2.1 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed and approved prior to implementation as follows:

- The Radiological Emergency Response Plan(s), Security Plan, Fire Protection Plan and implementing procedures, Administrative Instructions, and those test procedures associated with safety related plant modifications shall be reviewed by the PRC and approved by the Nuclear Plant Manager prior to implementation. *review as stated on p. 5 of SE*