



**Florida
Power**

CORPORATION
Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72

July 29, 1999
3F0799-28

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

Subject: Crystal River Unit 3 - Clarification of Information Provided in Amendment No. 180 Regarding Repair Criteria for Steam Generator Tubing (TAC No. MA3592)

Reference: NRC to FPC Letter, 3N0699-12, dated June 28, 1999, "Crystal River Unit 3 - Issuance of Amendment Regarding Repair Criteria for Steam Generator Tubing (TAC No. MA3592)"

Dear Sir:

This letter serves to clarify correspondence between the NRC and Florida Power Corporation (FPC). Amendment No. 180 to Facility Operating License No. DPR-72 for Crystal River Unit 3 (CR-3) was issued by the NRC in the referenced letter on June 28, 1999. This Amendment approved changes in inservice inspection and reporting requirements necessary for adoption of a repair roll process that will be used to repair steam generator tubes with defects within the upper tubesheet.

During the review of the associated Safety Evaluation (SE), FPC identified some inconsistencies between the information presented in the SE and in previous subject matter correspondence. FPC considers these inconsistencies to be minor misstatements having no effect on the conclusions of the SE. A discussion of these inconsistencies is provided in the attachment. No further action is planned.

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ATTACHMENT

Crystal River Unit 3 – Clarification of Information Provided in Amendment No. 180 Regarding Repair Criteria for Steam Generator Tubing (TAC No. MA3592)

Florida Power Corporation (FPC) reviewed the Safety Evaluation (SE) associated with Amendment No. 180 regarding Repair Criteria for Once Through Steam Generator (OTSG) Tubing and identified two (2) items inconsistent with prior subject matter correspondence. FPC considers these inconsistencies to be minor misstatements having no effect on the conclusions of the SE. A discussion of these inconsistencies is provided in the attachment. No further action is planned.

1. Submittal of Framatome Topical Report BAW-2303P, Revision 3

The first paragraph of Section 1.0, INTRODUCTION, indicates the Framatome Topical Report BAW-2303P, Revision 3, "OTSG Repair Roll Qualification Report", had been included in the FPC submittal dated August 31, 1998. Both the August 31, 1998, and March 18, 1999, FPC submittals referenced the report that had been submitted by Oconee Units 1, 2 and 3, and Davis-Besse (References 1 and 2). FPC did not submit any version of this report.

2. Seal Weld

The last paragraph of Section 1.0, INTRODUCTION, which states, in part, "...a seal weld at the primary face of each tubesheet prevents primary-to-secondary leakage around the hardroll expansions" is not an accurate representation. FPC submittals did not take credit for the seal weld in preventing fluid intrusion. The NRC demonstrated understanding of this fact in its characterization of the reroll process qualification program in the third paragraph of Section 3.1, Qualification Program, "...To obtain conservative leakage results, the sample tubes were severed 360 degrees through the tube wall in the roll joints".

References

1. Duke Power Company to NRC Letter, dated November 3, 1997, "Request for Technical Specification Amendment, Steam Generator tubing Surveillance", (Repair Roll License Amendment Request, revisions and answers to NRC request for additional information on BAW-2303P, Revision 3, "OTSG Repair Roll Qualification Report")
2. First Energy Corporation to NCR letter, dated March 13, 1998, Non-Proprietary Version of BAW-2303, "OTSG Repair Roll Qualification Report"

This letter establishes no new regulatory commitments. If you have any questions regarding this submittal, please contact Mr. Sid Powell, Manager, Nuclear Licensing at (352) 563-4883.

Sincerely,

A handwritten signature in black ink, appearing to read "D. L. Roderick". The signature is written in a cursive style with a large initial "D".

D. L. Roderick
Director, Nuclear Engineering & Projects

DLR/gko

Attachment

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