



**Florida Power**  
A Progress Energy Company

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

Ref: 10 CFR 50.90

April 18, 2002  
3F0402-12

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

Subject: Crystal River Unit 3 - License Amendment Request #269, Revision 0  
Application for Technical Specification Change Regarding Missed Surveillances  
Using the Consolidated Line Item Improvement Process

Dear Sir:

Florida Power Corporation (FPC) hereby submits License Amendment Request (LAR) #269, Revision 0, requesting a change to the Crystal River Unit 3 (CR-3) Facility Operating License No. DPR-72 in accordance with 10 CFR 50.90. The changes proposed by LAR #269 would modify the Improved Technical Specifications (ITS) requirements for missed surveillances specified in Surveillance Requirement (SR) 3.0.3.

Attachment A provides a description and assessment of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Proposed ITS and Bases changes and revised ITS and Bases pages are provided in Attachments B and C, respectively.

FPC requests approval of LAR #269 by October 18, 2002 with a 60 day implementation period.

The CR-3 Plant Nuclear Safety Committee has reviewed this request and recommended it for approval.

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,

Dale E. Young  
Vice President, Crystal River Nuclear Plant

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Attachments:

- A. Description and Assessment, Confirmation of Applicability, and Plant-Specific Verifications
- B. Proposed Improved Technical Specifications and Bases Changes
- C. Revised Improved Technical Specifications and Bases Pages

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

**STATE OF FLORIDA**

**COUNTY OF CITRUS**

Dale E. Young states that he is the Vice President, 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.

  
Dale E. Young  
Vice President  
Crystal River Nuclear Plant

The foregoing document was acknowledged before me this 18<sup>th</sup> day of April, 2002, by Dale E. Young.



LISA A. MORRIS  
Notary Public, State of Florida  
My Comm. Exp. Oct. 25, 2003  
Comm. No. CC 879691

  
Signature of Notary Public  
State of Florida

LISA A MORRIS  
(Print, type, or stamp Commissioned  
Name of Notary Public)

Personally Produced  
Known X -OR- Identification \_\_\_\_\_

**FLORIDA POWER CORPORATION**

**CRYSTAL RIVER UNIT 3**

**DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72**

**ATTACHMENT A**

**LICENSE AMENDMENT REQUEST #269, REVISION 0  
Application for Technical Specification Change Regarding Missed  
Surveillances Using the Consolidated Line Item Improvement Process**

**Description and Assessment, Confirmation of Applicability, and  
Plant-Specific Verifications**

**LICENSE AMENDMENT REQUEST #269, REVISION 0  
APPLICATION FOR TECHNICAL SPECIFICATION CHANGE REGARDING  
MISSED SURVEILLANCES USING THE CONSOLIDATED LINE ITEM  
IMPROVEMENT PROCESS**

**DESCRIPTION**

The proposed amendment would modify Technical Specifications (TS) requirements for missed surveillances in Surveillance Requirement (SR) 3.0.3.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/ Technical Specification Task Force (TSTF) TS change TSTF-358 Revision 5, as modified by Federal Register Notice 66FR32400, of June 14, 2001, and in response to public comments (TSTF-358, Revision 6). The availability of this TS improvement was published in the Federal Register on September 28, 2001 as part of the consolidated line item improvement process (CLIP).

**ASSESSMENT**

**Applicability of Published Safety Evaluation**

Florida Power Corporation (FPC) has reviewed the safety evaluation dated June 14, 2001 as part of the CLIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-358. FPC has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC are applicable to Crystal River Unit 3 (CR-3) and justify this amendment for the incorporation of the changes to the CR-3 TS.

**Optional Changes and Variations**

FPC is not proposing any variations or deviations from the TS changes described in the fully modified TSTF-358 Revision 5 or the NRC staff's model safety evaluation dated June 14, 2001.

**REGULATORY ANALYSIS**

**No Significant Hazards Consideration Determination**

FPC has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIP. FPC has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to CR-3 and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

**Verification and Commitments**

As discussed in the notice of availability published in the Federal Register on September 28, 2001 for this TS improvement, plant-specific verifications were performed as follows:

- FPC has established TS Bases for SR 3.0.3 which state that use of the delay period established by Surveillance Requirement 3.0.3 is a flexibility which is not intended to be

used as an operational convenience to extend surveillance intervals, but only for the performance of missed surveillances.

- The modification will also include changes to the Bases for SR 3.0.3 that provide details on how to implement the new requirements. The Bases changes provide guidance for surveillance frequencies that are not based on time intervals but are based on specified unit conditions, operating situations, or requirements of regulations. In addition, the Bases changes state that FPC is expected to perform a missed surveillance test at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance. The Bases also state that the risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risks Before Maintenance Activities at Nuclear Power Plants," and that the missed surveillance should be treated as an emergent condition, as discussed in Regulatory Guide 1.182. In addition, the Bases state that the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that missed surveillances for important components should be analyzed quantitatively. The Bases also state that the results of the risk evaluation determine the safest course of action. In addition, the Bases state that all missed surveillances will be placed in the licensee's Corrective Action Program. Finally, FPC has a Bases Control Program consistent with Section 5.5 of the STS.

## **ENVIRONMENTAL EVALUATION**

FPC has reviewed the environmental evaluation included in the model safety evaluation dated June 14, 2001 as part of the CLIIP. FPC has concluded that the staff's findings presented in that evaluation are applicable to CR-3 and the evaluation is hereby incorporated by reference for this application.

**FLORIDA POWER CORPORATION**

**CRYSTAL RIVER UNIT 3**

**DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72**

**ATTACHMENT B**

**LICENSE AMENDMENT REQUEST #269, REVISION 0  
Application for Technical Specification Change Regarding Missed  
Surveillances Using the Consolidated Line Item Improvement Process**

**Proposed Improved Technical Specifications and Bases Changes**

**Strikeout / Shadow Format**

<del>Strikeout Text</del>	Indicates deleted text
Shadowed text	Indicates added text

### 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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SR 3.0.1           SRs shall be met during the MODES or other specified conditions in the Applicability for individual Specifications, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2           The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Required Action requires performance of a Surveillance or its Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3           If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~ greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

(continued)

BASES

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SR 3.0.2  
(continued)

25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals or periodic Completion Time intervals beyond those specified.

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SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~ greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides an adequate time limit to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance. The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs.

~~When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.~~

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

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BASES

SR 3.0.3  
(continued)

SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementing guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in Regulatory Guide 1.182. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program. Refer to the Master Surveillance Plan for additional guidance for missed surveillances.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable Specification Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable Specification Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

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BASES

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SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. This Specification applies to changes in MODES or other specified conditions in the Applicability associated with unit shutdown as well as startup. However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, train, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed (per SR 3.0.1). Surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs in accordance with the requirements of SR 3.0.4 are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated Specification prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the Specification Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note, as not required to be performed until a particular event, condition, or time has been reached. The SRs are annotated consistent with the requirements of Section 1.4, Frequency.

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**FLORIDA POWER CORPORATION**

**CRYSTAL RIVER UNIT 3**

**DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72**

**ATTACHMENT C**

**LICENSE AMENDMENT REQUEST #269, REVISION 0  
Application for Technical Specification Change Regarding Missed  
Surveillances Using the Consolidated Line Item Improvement Process**

**Revised Improved Technical Specifications and Bases Pages**

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual Specifications, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Required Action requires performance of a Surveillance or its Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

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BASES

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SR 3.0.2  
(continued)

25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals or periodic Completion Time intervals beyond those specified.

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SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides an adequate time limit to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance. The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

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BASES

SR 3.0.3  
(continued)

SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementing guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in Regulatory Guide 1.182. The risk evaluation may use quantitative, qualitative, or blended methods. The degree and depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program. Refer to the Master Surveillance Plan for additional guidance for missed surveillances.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable Specification Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable Specification Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

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BASES

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SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. This Specification applies to changes in MODES or other specified conditions in the Applicability associated with unit shutdown as well as startup. However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, train, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed (per SR 3.0.1). Surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed.

Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs in accordance with the requirements of SR 3.0.4 are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated Specification prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the Specification Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note, as not required to be performed until a particular event, condition, or time has been reached. The SRs are annotated consistent with the requirements of Section 1.4, Frequency.

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