Florida Power
A Progress Energy Company

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

Ref: 10 CFR 50.90

August 14, 2002
3F0802-03

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

Subject: Crystal River Unit 3 – License Amendment Request #271, Revision 0
One Time 24-Hour Delay for Entry into Improved Technical Specification 3.0.3 for Two Inoperable Control Complex Chillers

Reference: NRC to FPC letter, 3N1001-06, dated October 16, 2001, "Crystal River Unit 3 – Issuance of Amendment Regarding Allowance of a One-Time Extension of Completion Time for Technical Specification LCO 3.7.18 and an Associated Waiver of LCO 3.0.4 Requirements" (TAC No. MB1617)

Dear Sir:

Pursuant to 10 CFR 50.90, Florida Power Corporation (FPC) hereby submits License Amendment Request (LAR) #271, which seeks approval to delay entry into Improved Technical Specification (ITS) Limiting Condition for Operation (LCO) 3.0.3. up to 24 hours for failure to meet the requirements of LCO 3.7.18, Condition A. This LAR is requested as a contingency for two inoperable Control Complex Chillers while Control Complex Cooling System (CCCS) chiller refurbishment is performed. Crystal River Unit 3 will have alternative cooling equipment staged and ready to be placed in service to cool the Control Complex within one hour of a trip of the operating chiller.

License Amendment No. 200, issued on October 16, 2001, modified LCO 3.7.18, Condition A to increase the completion time for restoring two Control Complex Cooling System trains to operable status from 7 to 35 days. The License Amendment was requested in order to perform chiller refurbishment, once for each train, during power operation. If the operating chiller trips during the refurbishment of the opposite train chiller, both trains of CCCS would be inoperable. Therefore, LCO 3.0.3 would apply, and would require the unit be placed in MODE 3 in seven hours, MODE 4 in thirteen hours, and MODE 5 in thirty-seven hours. Considering the capability of the alternate cooling systems to supply cooling to Control Complex equipment, and the low risk of a plant accident during any 24-hour period, this extension is considered to be a reasonable alternative to a forced plant shutdown. FPC respectfully requests approval of LAR # 271 by September 30, 2002. This approval date will support the planned schedule for refurbishing the second chiller.

FPC has determined that this request does not involve a significant hazards consideration pursuant to 10 CFR 50.92. Additionally, there is no significant increase in the amounts of any effluents that may be released offsite, and there is no significant increase in individual or cumulative

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occupational radiation exposure. Therefore, this LAR satisfies the criteria of 10 CFR 51.22(c)(9) for categorical exclusion from the requirement for an environmental assessment.

This letter establishes regulatory commitments (Attachment F).

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

Dale E. Young
Vice President, Crystal River Nuclear Plant

DEY/lvc

Attachments:

A. Background, Description of Proposed Change, Reason for Request, and Evaluation of Request
B. No Significant Hazards Consideration Determination
C. Environmental Impact Evaluation
D. Proposed Revised Improved Technical Specifications Pages – Strikeout/Shadowed Format
E. Proposed Revised Improved Technical Specifications Pages – Revision Bar Format
F. List of Regulatory Commitments

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

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

Dale E. Young
Vice President
Crystal River Nuclear Plant

The foregoing document was acknowledged before me this 14th day of August, 2002, by Dale E. Young.

Lisa A Morris

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 Y -OR- Produced Identification _____

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT A

LICENSE AMENDMENT REQUEST #271

Background, Description of Proposed Change, Reason for Request and Evaluation of Request

Background

Condition A of Improved Technical Specification (ITS) 3.7.18, "Control Complex Cooling System," requires that two Control Complex Cooling trains shall be OPERABLE. If one or more trains are inoperable AND at least 100% of the cooling capability of a single OPERABLE Control Complex Cooling train is available from the Operating Control Complex Cooling system, operation may continue for 7 days. The note to the Completion Time allows on a one-time basis, each Control Complex Cooling System (CCCS) train may be inoperable for up to 35 days to allow performance of chiller refurbishment activities. If the equipment within the CCCS is not capable of providing adequate cooling capability, Limiting Condition for Operation (LCO) 3.0.3 applies.

Description of the Proposed License Amendment Request

Florida Power Corporation (FPC) requests the addition of a note to ITS 3.7.18, Condition A to allow a 24-hour delay for entry into ITS LCO 3.0.3. This time period would be adequate to diagnose and restart a Control Complex chiller that may trip due to a number of possible causes. Based on previous experience, FPC is confident that the proposed period of 24 hours will be sufficient to restart the affected chiller. If it is determined that the condition cannot be remedied in the delay period of 24 hours, and the remaining chiller can not be returned to service by that time, ITS LCO 3.0.3 will be entered.

Reason for Request

Refurbishment of the 'B' train Control Complex chiller was completed in March 26, 2002. The 'A' train Control Complex chiller will be placed out of service beginning September 30, 2002 for a complete rebuild of the unit. The rebuild is scheduled for a 17 day duration. During that period, Crystal River Unit 3 (CR-3) will be operating with the recently rebuilt 'B' train chiller in service providing cooling to the Control Complex. If the 'B' train chiller were to trip, it would render both Control Complex Chiller trains inoperable. Therefore, LCO 3.0.3 would apply and will require the unit be placed in MODE 3 in 7 hours, MODE 4 in 13 hours and MODE 5 in 37 hours. CR-3 will have alternative non-safety related cooling equipment staged and ready to be placed in service within one hour to serve the function of the Control Complex Chiller. During the 24-hour period at normal operating conditions, the alternative cooling systems will maintain the average bulk air temperature below 87°F in the Control Complex, and individual room temperatures will not exceed maximum design temperature limits.

FPC is submitting this License Amendment Request (LAR) as a contingency in the event the single operating chiller trips during the extended refurbishment period of the opposite train chiller. In the event of a chiller trip, CR-3 personnel would start the alternative cooling equipment within one hour, evaluate the cause for the chiller trip, and determine a time frame for restarting the tripped chiller. While the 'A' train chiller is being refurbished, FPC Technicians, chiller manufacturer, Technicians, and Maintenance management personnel will be on site continuously, providing the best opportunity to diagnose and repair a tripped 'B' train chiller. While repairing and restarting the tripped chiller, Operations and Engineering personnel will monitor the operation of the alternative cooling systems, and Control Complex temperatures. If temperatures are not maintained below administrative limits established for monitoring the performance of the alternative cooling systems, shutdown of the unit to

MODE 5 will be initiated. The basis for this request is that the risk of a design basis event occurring within the 24-hour period during which CR-3 is using the alternative cooling systems is acceptably small, and is less than the risk posed by a forced shutdown of the unit.

Deterministic Evaluation

FPC has previously evaluated the design basis associated with chiller unavailabilty. The most significant functional impact to core damage from the chillers is providing heat removal for the Emergency Feedwater (EFW) control cabinets. Loss of cooling to the cabinets can cause the EFW control valves to inadvertently close. The evaluation concluded that if the operating Control Complex Chiller fails, the operators can use the Appendix R chiller for this function. The Appendix R Chilled Water System can be aligned to provide backup cooling for Control Complex vital equipment located outside the control room. The Appendix R Chiller is non-safety, and can be powered manually from the emergency diesel-backed 'B' train ES 480 volt Bus. Under normal conditions these chillers can run simultaneously, but CR-3 loading calculations do not assume simultaneous operation of the 'B' train chiller and the Appendix R chiller during events or accident loading conditions. The same evaluation concluded that if all EFW is lost, it is still possible to cool the core using the non-safety related, diesel-backed Auxiliary Feedwater Pump (FWP-7), which is not dependent on cooling from the CCCS.

The loss of both Control Complex chillers would result in a loss of safety related cooling equipment for the Control Complex. Alternative non-safety related cooling methods will be placed in service within one hour to provide cooling for the Control Complex. However, an increase in temperature is expected. FPC has evaluated the effect of increased temperatures on the equipment and instruments located in the Control Complex. Instrumentation and control devices are the most sensitive to ambient temperature changes. Per the Environmental & Seismic Qualification Program Manual (ESQPM), the various Control Complex rooms that house plant instrumentation experience a normal ambient temperature of 70 to 80°F. This is based on an operating Control Complex chiller and various functioning HVAC duct heaters. While operating with alternative Control Complex cooling, it is anticipated that the temperatures will exceed the ESQPM range with local temperatures possibly up to a temperature of 104°F. An evaluation has been performed on the effect that this abnormal range of 80 to 104°F would have on the plant instrumentation. The effect has been assessed with respect to the safety systems actuation setpoint accuracy, the display instrumentation uncertainty values used to monitor ITS allowable values, and display instrumentation uncertainties used for monitoring design basis operational limits.

The following is a list of systems that were evaluated for elevated ambient temperature conditions:

Reactor Protection setpoints
Engineered Safeguards Actuation setpoints
Emergency Feedwater Initiation and Control setpoints
Control Rod Drive Position Indication
Reactor Coolant (RC) Hot Leg Narrow Range Temperature
RC Flow
RC Narrow Range Pressure
Reactor Building (RB) Narrow Range Pressure
RB Temperature

Pressurizer Level
Makeup Tank Level and Pressure
Secondary Heat Balance

All of these evaluations concluded that there would be insignificant changes to instrument loop uncertainties within the temperature range of 70 to 104°F. The following list of parameters, which do not normally vary over short intervals (24 hours), and that have loop components in the Control Complex were evaluated to be bounded by the evaluations performed above for temperature excursions up to 104°F.

Emergency Feedwater Tank Level
Condensate Storage Tank Level
Fire Service Water Storage Tanks Level
Borated Water Storage Tank Level
Borated Water Storage Tank Temperature
Condenser Hotwell Level
Core Flood Tank Level and Pressure
Nuclear Services Closed Cycle Cooling Surge Tank Level and Pressure
Decay Heat Closed Cycle Cooling Surge Tank Level

These evaluations are based on best estimate assumptions and engineering judgment applied to existing models and calculations. On this basis, FPC is confident that the setpoints of Technical Specification instrumentation that are used to meet 10 CFR 50.36(c)(2)(ii) Criterion 1 and Criterion 2 are relatively unaffected to temperatures up to 104°F. Additionally, FPC has established limiting temperatures for various areas in the Control Complex to ensure all required components can perform their design functions. Thus, there is a high degree of confidence that instrumentation needed to monitor and actuate to maintain safety limits and design bases limits will perform their functions during increased temperature conditions.

Established surveillance procedures verify instrument response to expected parameters at steady state power operation. Remaining at steady state operation while cooling is provided by the alternative cooling systems, and is a benefit in assessing proper instrument response when compared to monitoring changing parameters expected during a plant shutdown transient.

Compliance with control room habitability requirements will be maintained.

Risk Evaluation

FPC has evaluated LAR #271 for its impact from a risk perspective. The 24-hour period that both chillers will be unavailable was evaluated and results in a delta Core Damage Frequency (CDF) of 3.66E-07. Combining this with the delta CDF of 6.3E-07, based on the previously approved 35-day maintenance to one chiller, yields a maximum delta CDF of 9.96E-07. Based on standard industry practice, however, CR-3 only schedules one half of the allowed outage time for maintenance. Considering this, the maximum expected delta CDF due to this change would be 5.9E-07, based on a planned 17-day maintenance of one chiller. This is less than the delta CDF of 6.3E-07 of a one-time 35-day maintenance outage as approved in License Amendment No. 200. This risk assessment does not credit the compensatory measures, which significantly reduce the risk associated with this activity.

Compensatory Measures

During the period of time that chiller repairs are in progress, maintenance and surveillance activities that have the potential to impact the performance of the Appendix R Chilled Water System or required support systems will not be performed. This includes minimizing activities that could potentially cause a plant trip or a loss of offsite power.

Alternate cooling to the Control Complex will be established by the following compensatory measures:

Startup of 20 tons of pre-staged air conditioning (AC)

The guidance for aligning temporary cooling to the Control Complex is provided in Section 4.1 of Maintenance Procedure MP-193, "Temporary Cooling to a Control Complex." During the refurbishment of the 'A' train Control Complex chiller, 20-ton of portable AC (sensible heat removal) will be pre-staged on the 145-foot elevation of the Turbine Building, outside of the Control Room, prior to the start of Control Complex Chiller refurbishment activities. Initiation of cooling to the Control Room using the portable AC requires routing expandable ductwork (from the unit into the Control Complex through the vestibule and Control Complex Habitability Envelope (CCHE) door on the 145-foot elevation) and starting the unit. These actions will be completed within one hour of the second safety related chiller unavailability.

While the temporary cooling is in place, appropriate security measures will be taken to assure proper access control to the Control Complex.

Alignment of the Appendix R Chilled Water System to supply cooling to the vital equipment areas in the Control Complex

The guidance for aligning Appendix R chilled water to supply dedicated loads in the Control Complex is provided in Section 4.3 of Operating Procedure OP-409, "Plant Ventilation System." Required actions in this procedure section include:

1. securing the Appendix R Chiller and isolating Appendix R chilled water to the Turbine Building Switchgear cooling units and Reactor Building penetration cooling,

2. isolating normal duty chilled water to the Emergency Feedwater Initiation and Control (EFIC) Room cooling units,

3. aligning Appendix R chilled water to the individual cooling units in the EFIC, Battery Charger, Inverter, Remote Shutdown, and 4160V and 480V Switchgear Rooms,

4. restarting the Appendix R chiller, and

5. starting the individual cooling unit fans.

These actions will be completed within one hour of chiller unavailability.

The Control Room Emergency Ventilation System (CREVS) operates in combination with the CCCS during normal operation to distribute cooling to all areas of the Control Complex

CREVS will remain in operation to distribute the cooled air provided by the Appendix R Chilled Water System and the portable 20-ton AC to all areas of the Control Complex. If outside air is cooler than the air inside the Control Complex, CREVS will operate in normal mode with 5,000 CFM fresh air intake and discharge. If outside air is warmer, CREVS will operate in the normal recirculation mode with no intake or discharge.

The Control Complex will be adequately cooled within the requested 24-hour period as follows:

A. CR-3 has previous experience maintaining cooling to the Control Room with portable AC; and

B. The Appendix R chiller and associated heat exchangers have the capacity of removing approximately 50 tons of heat from the Control Complex. This capacity in combination with 20-tons of portable AC results in 70 tons of sensible heat removal capacity, which will maintain environmental conditions in the Control Complex below design limits for a duration of 61 hours (24-hour delay for entry into ITS LCO 3.0.3 plus 37 hours to place the Unit in MODE 5).

FPC has established procedures to reduce unnecessary heat loads while operating with the alternative cooling systems.

Additional administrative compensatory controls have been established in the event of operator fatigue resulting from higher temperature conditions during the implementation of this LAR. These measures include additional personnel on shift for relief, supplemental comfort measures such as local fans for the control board area and the availability of ice vests for Control Room personnel.

Performance Monitoring

FPC has established procedures to monitor the temperature in the Control Complex while operating with the alternative cooling systems. Administrative limits on temperature have been established for bulk air temperature in the Control Complex and for each individual area to preserve equipment operability. If the temperature limits are exceeded within the 24-hour period, the plant will initiate shutdown to MODE 5.

Conclusion

Based on the above evaluation, FPC believes that approval of the proposed one time ITS change for a 24-hour delay for entry into ITS 3.0.3, due to inoperability of both chillers, will pose an insignificant risk to the plant or to the health and safety of the public.

Reference

FPC to NRC letter, 3F0701-02, dated July 19, 2001, "Crystal River Unit 3 – Response to NRC Request for Additional Information Re: Proposed License Amendment Request #259, Revision 0, "Control Complex Cooling System" (TAC No. MB1617)

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT B

LICENSE AMENDMENT REQUEST #271

No Significant Hazards Consideration Determination

No Significant Hazards Consideration Determination

License Amendment Request (LAR) #271 proposes that the note to Improved Technical Specification (ITS) 3.7.18 Completion Time be revised to allow a 24-hour delay for entry into ITS 3.0.3. This LAR is requested as a contingency for two inoperable Control Complex chillers while Control Complex Cooling System chiller refurbishment is performed. This request has been evaluated against the standards in 10 CFR 50.92 and has been determined to not involve a significant hazards consideration. In support of this conclusion, the following analysis is provided:

1. *Does not involve a significant increase in the probability or consequences of an accident previously analized.*

The Control Complex Cooling System is not an initiator of any design basis accident. The basis for this request is that the risk of a design basis event ocurring within the 24-hour period during which alternative cooling will be used is acceptably small, and is less than the risk posed by a forced shutdown of the unit. The Control Complex Cooling System safety function is to provide sufficient cooling to ensure operability of safety-related equipment located in the control room and other portions of the Control Complex. Control Complex cooling, within the 24-hour period, is being accomplished by the compensatory measures in place which include providing alternate cooling by aligning the Appendix R Chilled Water System to supply cooling to the vital equipment areas in the Control Complex and operation of pre-staged portable air conditioning that provides cooling to the Control Room. Control Complex Habitability Envelope Integrity will be maintained throughout the duration of this operating condition, which will ensure that potential post-accident dose to operators, is maintained within analyzed limits. Therefore, granting this License Amendment Request for a 24-hour delay for entry into ITS 3.0.3, due to inoperability of a second chiller, does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. *Does not create the possibility of a new or different type of accident from any accident previously analized.*

The proposed License Amendment Request for a 24-hour delay for entry into ITS 3.0.3, due to inoperability of a second chiller, will not result in changes to the design, physical configuration of the plant. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

3. *Does not involve a significant reduction in the margin of safety.*

During the 24-hour delay for entry into ITS 3.0.3, due to inoperability of a second chiller, measures will be implemented to ensure the availability of temporary and permanently installed non-safety backup systems capable of providing cooling to the control room and other vital equipment areas in the Control Complex. From the risk significance perspective, using installed non-safety backup systems to provide cooling to the control room and other vital equipment areas in the Control Complex is acceptable. Areas with essential equipment in the Control Complex will be monitored to ensure temperatures do not exceed acceptable limits. Therefore, granting a License Amendment Request for a 24-hour delay for entry into ITS 3.0.3, due to inoperability of a second chiller, does not involve a significant reduction in the margin of safety.

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT C

LICENSE AMENDMENT REQUEST #271

Environmental Impact Evaluation

Environmental Impact Evaluation

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not:

(i) involve a significant hazards consideration,

(ii) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and

(iii) result in a significant increase in individual or cumulative occupational radiation exposure.

Florida Power Corporation has reviewed the proposed License Amendment Request #271 and concludes it meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(c), no environmental impact statement or environmental assessment needs to be prepared in connection with this request.

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT D

LICENSE AMENDMENT REQUEST #271

Proposed Revised Improved Technical Specifications Pages

Strikeout/Shadowed Format

~~Strikeout Text~~ Indicates Deleted Text
Shadowed Text Indicates Added Text

3.7 PLANT SYSTEMS

3.7.18 Control Complex Cooling System

LCO 3.7.18 Two Control Complex Cooling trains shall be OPERABLE. **

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION
A. One or more trains inoperable. AND At least 100% of the cooling capability of a single OPERABLE Control Complex Cooling train available.	A.1 Ensure adequate cooling capability from the Control Complex Cooling system in operation. AND A.2 Restore Control Complex Cooling trains(s) to OPERABLE status.	Immediately 7 days*
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in Mode 3. AND B.2 Be in Mode 5.	6 hours 36 hours

*On a one-time basis, each Control Complex Cooling System train may be inoperable for up to 35 days to allow performance of chiller refurbishment activities. LCO 3.0.4 is not applicable during each of the one-time 35-day Completion Times. The ability to apply the one-time 35-day Completion Time to each Control Complex Cooling System train will expire on December 31, 2002.

**If a second chiller becomes inoperable during the 35-day extended completion Time, entrance into LCO 3.0.3 may be delayed up to 24 hours provided alternative cooling can maintain the Control Complex temperature within acceptable limits.

BASES

ACTIONS A.1 (continued)

With one or more components inoperable such that the cooling capability equivalent to a single OPERABLE train is not available, the facility is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be immediately entered.

With one or more Control Complex Cooling trains inoperable and at least 100% cooling capability of a single OPERABLE train available, the inoperable components must be restored to OPERABLE status within 7 days*. In this Condition, the remaining Control Complex Cooling System equipment is adequate to maintain the control complex temperature. Adequate cooling capability exists when the control complex air temperature is maintained within the limits for the contained equipment and components. However, the overall reliability is reduced because additional failures could result in a loss of Control Complex Cooling System function. The 7 day Completion Time is based on the low probability of an event occurring requiring the Control Complex Cooling System and the consideration that the remaining components can provide the required capabilities.

*On a one-time basis, each Control Complex Cooling System train may be inoperable for up to 35 days to allow performance of chiller refurbishment activities. LCO 3.0.4 is not applicable during each of the one-time 35-day Completion Times. The ability to apply the one-time 35-day Completion Time to each Control Complex Cooling System train will expire on December 31, 2002.

**If a second chiller becomes inoperable during the 35-day extended Completion Time, entrance into LCO 3.0.3 may be delayed up to 24 hours provided alternative cooling can maintain the Control Complex temperature within acceptable limits. Specification 3.0.3 normally applies when there is a loss of safety function. In this case, delaying entry into 3.0.3 is acceptable because alternate cooling methods will be in place in support of chiller maintenance. Control Complex temperatures will be monitored during this 24-hour delay period to ensure all required equipment is maintained within acceptable limits.

B.1 and B.2

If the inoperable Control Complex Cooling System component cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner without challenging unit systems.

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FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT E

LICENSE AMENDMENT REQUEST #271

Proposed Revised Improved Technical Specifications Change Pages

Revision Bar Format

3.7 PLANT SYSTEMS

3.7.18 Control Complex Cooling System

LCO 3.7.18 Two Control Complex Cooling trains shall be OPERABLE. **

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION
A. One or more trains inoperable. AND At least 100% of the cooling capability of a single OPERABLE Control Complex Cooling train available.	A.1 Ensure adequate cooling capability from the Control Complex Cooling system in operation. AND A.2 Restore Control Complex Cooling trains(s) to OPERABLE status.	Immediately 7 days*
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in Mode 3. AND B.2 Be in Mode 5.	6 hours 36 hours

*On a one-time basis, each Control Complex Cooling System train may be inoperable for up to 35 days to allow performance of chiller refurbishment activities. LCO 3.0.4 is not applicable during each of the one-time 35-day Completion Times. The ability to apply the one-time 35-day Completion Time to each Control Complex Cooling System train will expire on December 31, 2002.

**If a second chiller becomes inoperable during the 35-day extended completion time, entrance into LCO 3.0.3 may be delayed up to 24 hours provided alternative cooling can maintain the Control Complex temperature within acceptable limits.

ACTIONS A.1 (continued)

With one or more components inoperable such that the cooling capability equivalent to a single OPERABLE train is not available, the facility is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be immediately entered.

With one or more Control Complex Cooling trains inoperable and at least 100% cooling capability of a single OPERABLE train available, the inoperable components must be restored to OPERABLE status within 7 days*. In this Condition, the remaining Control Complex Cooling System equipment is adequate to maintain the control complex temperature. Adequate cooling capability exists when the control complex air temperature is maintained within the limits for the contained equipment and components. However, the overall reliability is reduced because additional failures could result in a loss of Control Complex Cooling System function. The 7 day Completion Time is based on the low probability of an event occurring requiring the Control Complex Cooling System and the consideration that the remaining components can provide the required capabilities.

*On a one-time basis, each Control Complex Cooling System train may be inoperable for up to 35 days to allow performance of chiller refurbishment activities. LCO 3.0.4 is not applicable during each of the one-time 35-day Completion Times. The ability to apply the one-time 35-day Completion Time to each Control Complex Cooling System train will expire on December 31, 2002.

**If a second chiller becomes inoperable during the 35-day extended completion time, entrance in LCO 3.0.3 may be delayed up to 24 hours provided alternative cooling can maintain the Control Complex temperature within acceptable limits. Specification 3.0.3 normally applies when there is a loss of safety function. In this case, delaying entry into 3.0.3 is acceptable because alternate cooling methods will be in place in support of chiller maintenance. Control Complex temperatures will be monitored during this 24-hour delay period to ensure all required equipment is maintained within acceptable limits.

B.1 and B.2

If the inoperable Control Complex Cooling System component cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner without challenging unit systems.

(continued)

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT F

LICENSE AMENDMENT REQUEST #271

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Florida Power Corporation in this document. Any other actions discussed in the submittal represent intended or planned actions by Florida Power Corporation. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Supervisor, Licensing and Regulatory Programs, of any questions regarding this document or any associated regulatory commitments.

ID Number	Commitment	Commitment Date
3F0802-03-1	FPC has established procedures to monitor the temperature in the Control Complex while operating with the alternative cooling systems. Administrative limits on temperature have been established for bulk air temperature in the Control Complex and for each individual area to preserve equipment operability. If the temperature limits are exceeded within the 24-hour period, the plant will initiate shutdown to MODE 5.	During the requested 24-hour delay period.
3F0802-03-2	Maintenance and surveillance activities that have the potential to impact the performance of the Appendix R Chilled Water System or required support systems will not be performed. This includes minimizing activities that could potentially cause a plant trip or a loss of offsite power.	During the period of time that chiller repairs are in progress.
3F0802-03-03	Compensatory measures are identified in a plant administrative procedure.	Prior to placing the 'A'train Control Complex chiller out of service.