Progress Energy

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

Ref: 10CFR50.90

March 4, 2003
3F0303-04

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

Subject: Crystal River Unit 3 – Supplemental Information to License Amendment Request #272, Revision 0 - Revision to Improved Technical Specifications 3.3.15 "Reactor Building (RB) Purge Isolation-High Radiation;" Bases 3.7.15 "Spent Fuel Assembly Storage;" 3.9.3 "Containment Penetrations;" and 3.9.6 "Refueling Canal Water Level"

References:
1. FPC to NRC letter, 3F1002-03, dated October 11, 2002, Crystal River Unit 3 – License Amendment Request #272, Revision 0 - Revision to Improved Technical Specifications 3.3.15 "Reactor Building (RB) Purge Isolation-High Radiation;" Bases 3.7.15 "Spent Fuel Assembly Storage;" 3.9.3 "Containment Penetrations;" and 3.9.6 "Refueling Canal Water Level"

2. Technical Specification Task Force (TSTF) Traveler 51, "Revise Containment Requirements During Handling Irradiated Fuel and Core Alterations," Revision 2

3. NUMARC 93-01, Industry Guidelines for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants, Revision 3, Section 11.3.6, Assessment Methods for Shutdown Conditions

Dear Sir:

On October 11, 2002, Florida Power Corporation (FPC) (now doing business as Progress Energy Florida, Inc.) submitted Reference 1, License Amendment Request (LAR) #272 for Crystal River – Unit 3 (CR-3). The LAR incorporated TSTF-51 (Reference 2) into the CR-3 Improved Technical Specifications (ITS).

On February 6, 2003, the NRC Project Manager for CR-3 requested a supplement to LAR #272 with respect to being consistent with Reference 3.

A001

Progress Energy Florida, Inc.
Crystal River Nuclear Plant
15760 W. Power Line Street
Crystal River, FL 34428

The purpose of this letter is to confirm that the commitments in Reference 1 (and restated in Attachment B) are consistent with NUMARC 93-01, Revision 3, Section 11.3.6 "Assessment Methods for Shutdown Conditions", Subsection 5 "Containment – Primary (PWR) / Secondary (BWR)." This is the same as the draft NUMARC 93-01, Revision 3 noted in Reference 2, Insert M, Reviewer's Note (and restated in Attachment A).

This letter does not revise the Improved Technical Specification pages, the Regulatory Analysis, or the Evaluation of LAR #272 submitted in Reference 1.

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

DEY/rmb

Attachments:

A. TSTF-51, Insert M, Reviewer's Note
B. Regulatory Commitments from LAR #272

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 Florida, Inc.; 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 4th day of March, 2003, by Dale E. Young.

Lisa A Morris

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 Known X -OR- Produced Identification _____

PROGRESS ENERGY FLORIDA INC.

CRYSTAL RIVER UNIT – 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

ATTACHMENT A

SUPPLEMENT TO LICENSE AMENDMENT REQUEST #272
Implementation of TSTF-51, Rev. 2

TSTF-51, Insert M, Reviewer's Note

TSTF-51, Insert M, Reviewer's Note

The addition of the term "recently" associated with handling irradiated fuel in all of the containment function Technical Specification requirements is only applicable to those licensees who have demonstrated by analysis that after sufficient radioactive decay has occurred, off-site doses resulting from a fuel handling accident remain below the Standard Review Plan limits (well within 10CFR100).

Additionally, licensees adding the term "recently" must make the following commitment which is consistent with draft NUMARC 93-01, Revision 3, Section 11.2.6 "Safety Assessment for Removal of Equipment from Service During Shutdown Conditions", subheading "Containment – Primary (PWR) / Secondary (BWR)".

"The following guidelines are included in the assessment of systems removed from service during movement of irradiated fuel:

- During fuel handling/core alterations, ventilation system and radiation monitor availability (as defined in NUMARC 91-06) should be assessed, with respect to filtration and monitoring of releases from the fuel. Following shutdown, radioactivity in the fuel decays away fairly rapidly. The basis of the Technical Specification operability amendment is the reduction in doses due to such decay. The goal of maintaining ventilation system and radiation monitor availability is to decrease doses even further below that provided by the natural decay.
- A single normal or contingency method to promptly close primary or secondary containment penetrations should be developed. Such prompt methods need not completely block the penetration or be capable of resisting pressure.

The purpose of the "prompt methods" mentioned above are to enable ventilation systems to draw the release from a postulated fuel handling accident in the proper direction such that it can be treated and monitored."

PROGRESS ENERGY FLORIDA INC.

CRYSTAL RIVER UNIT - 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

ATTACHMENT B

SUPPLEMENT TO LICENSE AMENDMENT REQUEST #272
Implementation of TSTF-51, Rev. 2

Regulatory Commitments from LAR #272

Regulatory Commitments from LAR #272

1. Commitment:

FPC (now doing business as Progress Energy Florida, Inc.) will have procedures to require, in the case of a Fuel Handling Accident, a contingency method to promptly close primary containment penetrations that provide a path to the environment. Such prompt methods need not completely block the penetration or be capable of resisting pressure.

Background:

The purpose is to enable the Reactor Building Purge System Exhaust or the Reactor Building Mini-Purge to draw the radiation release from a postulated fuel handling accident (FHA) in the proper direction such that it can be monitored by the Reactor Building Purge High Radiation Monitor (RM-A1).

2. Commitment:

FPC (now doing business as Progress Energy, Inc.) will have procedures in place which will, in the case of a Fuel Handling Accident, require the bypassing of the Containment Purge High Radiation Isolation and will require the initiation of the Containment purge exhaust or mini-purge exhaust so that any radioactivity that might be released by an FHA will be drawn in the proper direction and be monitored as it is being released.

Background:

Following shutdown, radioactivity in the Reactor Coolant System (RCS) decays fairly rapidly. The goal on maintaining either the Reactor Building Purge System Exhaust or the Reactor Building Mini-Purge, and the associated radiation monitor (RM-A1) availability, is to enable the ventilation system to draw the release for an FHA in the proper direction such that is can be monitored.

NUMARC 91-06 defines "availability" as the status of a system, structure, or component that is in service or can be placed in service in a functional or operable state by immediate manual or automatic actuation. "Functional" is defined as the ability of a system, structure, or component to perform its intended service with considerations that applicable Technical Specification requirements or licensing / design basis assumptions may not be maintained. "Operable" is defined as the ability of a system to perform its specified function with all applicable Technical Specification requirements satisfied.