



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

Ref: 10 CFR 50.90

February 27, 2004  
3F0204-05

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

Subject: Crystal River Unit 3 – License Amendment Request No. 279, Revision 0,  
Application for Technical Specification Improvement to Eliminate Requirements  
for Post Accident Sampling System for Babcock and Wilcox Reactors Using the  
Consolidated Line Item Improvement Process

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Florida Power Corporation, doing business as Progress Energy Florida, Inc. (PEF), is submitting a request for an amendment to the Improved Technical Specifications (ITS) for Crystal River – Unit 3 (CR-3).

The proposed amendment would delete Technical Specification (TS) 5.6.2.6, "Post Accident Sampling," and thereby eliminate the requirements to have and maintain the post accident sampling system at CR-3. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-442, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced in the *Federal Register* on May 13, 2003 (68FR25664) as part of the consolidated line item improvement process (CLIIP).

Attachment A provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment B provides the existing ITS pages marked-up to show the proposed change. Attachment C provides revised clean technical specification pages. Attachment D provides a summary of the regulatory commitments made in this submittal.

PEF requests approval of the proposed License Amendment by April 30, 2004, with the amendment being implemented within 60 days.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Florida Official.

If you should have any questions regarding this submittal, please contact Mr. Sid Powell, Supervisor, Licensing & Regulatory Programs at (352) 563-4883.

Sincerely,



Dale E. Young,  
Vice President, Crystal River Nuclear Plant

Attachments:

- A. Description and Assessment
- B. Proposed Technical Specification Changes – Strikeout and Highlight
- C. Proposed Technical Specification Pages – Revision Bar
- D. Regulatory Commitments

cc: NRR Project Manager  
Regional Administrator, Region II  
Senior Resident Inspector  
State Contact

**STATE OF FLORIDA**

**COUNTY OF CITRUS**

Dale E. Young states that he is the Vice President, Crystal River Nuclear Plant for Florida Power Corporation, doing business as 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 27<sup>th</sup> day of February, 2004, by Dale E. Young

Lisa A Morris  
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**

**License Amendment Request No. 279, Revision 0, Application for Technical Specification Improvement to Eliminate Requirements for Post Accident Sampling System for Babcock and Wilcox Reactors Using the Consolidated Line Item Improvement Process**

**ATTACHMENT A**

**Description and Assessment**

## Description and Assessment

### 1.0 DESCRIPTION

The proposed License amendment deletes the program requirements of ITS 5.6.2.6, "Post Accident Sampling."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-442. The availability of this technical specification improvement was announced in the *Federal Register* on May 13, 2003, (68FR25664) as part of the consolidated line item improvement process (CLIIP).

### 2.0 ASSESSMENT

#### 2.1 Applicability of Published Safety Evaluation

Florida Power Corporation, doing business as Progress Energy Florida, Inc. (PEF), has reviewed the safety evaluation (SE) published on March 3, 2003 (68 FR 10052) as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-442 (i.e., BAW-2387, "Justification for the Elimination of the Post Accident Sampling System (PASS) from the Licensing Basis of Babcock and Wilcox-Designed Plants," which was submitted to the NRC on June 25, 2001, and the associated NRC safety evaluation dated November 14, 2002). PEF has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Crystal River – Unit 3 (CR-3) and justify this amendment for the incorporation of the changes to the CR-3 Improved Technical Specifications.

#### 2.2 Optional Changes and Variations

PEF is not proposing any variations or deviations from the technical specification changes described in TSTF-442 or the NRC staff's model safety evaluation published on March 3, 2003.

Requirements for installing and maintaining PASS were included in a confirmatory order for CR-3 issued on March 14, 1983. This amendment request includes superseding the requirements imposed by that confirmatory order.

### 3.0 REGULATORY ANALYSIS

#### 3.1 No Significant Hazards Determination

PEF has reviewed the proposed no significant hazards consideration determination published on March 3, 2003 (68 FR 10052) as part of the CLIIP. PEF has concluded that the proposed determination presented in the notice is applicable to CR-3 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

### 3.2 Verification and Commitments

As discussed in the model SE published in *Federal Register* on March 3, 2003 for this technical specification improvement, plant-specific verifications were performed as follows:

1. PEF verified that it has contingency plans for obtaining and analyzing highly radioactive samples from the RCS, containment sump, and containment atmosphere. The contingency plans are contained in plant procedures and implementation is complete. Establishment and maintenance of contingency plans is considered a regulatory commitment.
2. The capability for classifying fuel damage events at the Alert level threshold has been established for CR-3 at radioactivity levels of  $> 300 \mu\text{Ci/gm}$  I-131 dose equivalent. This capability is described in plant procedures and implementation is complete. The capability for classifying fuel damage events is considered a regulatory commitment.
3. PEF verified that it has an ability to assess radioactive iodines released to offsite environs. The capability for monitoring iodines will be maintained within plant procedures. Implementation of this commitment is complete. The capability to monitor radioactive iodines is considered a regulatory commitment.

### 4.0 ENVIRONMENTAL EVALUATION

PEF has reviewed the environmental evaluation included in the model safety evaluation published on March 3, 2003 (68 FR 10052) as part of the CLIIP. PEF 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.

**PROGRESS ENERGY FLORIDA, INC.**

**CRYSTAL RIVER - UNIT 3**

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

**License Amendment Request No. 279, Revision 0, Application for Technical Specification Improvement to Eliminate Requirements for Post Accident Sampling System for Babcock and Wilcox Reactors Using the Consolidated Line Item Improvement Process**

**ATTACHMENT B**

**Proposed Technical Specification Changes – Strikeout and Highlight**

5.6 Procedures, Programs and Manuals

---

5.6.2.3 ODCM (continued)

3. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date, (e.g., month/year) the change was implemented.

5.6.2.4 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Low Pressure Injection, Reactor Building Spray and Makeup and Purification. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.6.2.5 Component Cyclic or Transient Limit

This program provides controls to track the FSAR Table 4.8, cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.6.2.6 ~~Not Used~~ Post Accident Sampling

~~This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:~~

- ~~a. Training of personnel;~~
- ~~b. Procedures for sampling and analysis; and~~

(continued)

5.6 Procedures, Programs and Manuals

---

~~5.6.2.6 Post Accident Sampling (continued)~~

- ~~c. Provisions for maintenance of sampling and analysis equipment.~~

5.6.2.7 Not Used

5.6.2.8 Inservice Inspection Program

This program provides controls for inservice inspection of ASME Code Class 1, 2, 3, MC and CC components, including applicable supports. The program shall include the following:

- a. Provisions that inservice inspection of ASME Code Class 1, 2, 3, MC and CC components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a;
- b. The provisions of SR 3.0.2 are applicable to the frequencies for performing inservice inspection activities;
- c. Inservice inspection of each reactor coolant pump flywheel shall be performed at least once every ten years. The inservice inspection shall be either an ultrasonic examination of the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination for exposed surfaces of the disassembled flywheels. The recommendations delineated in Regulatory Guide 1.14, Positions 3, 4, and 5 of Section C.4.b shall apply.
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.

---

(continued)

**PROGRESS ENERGY FLORIDA, INC.**

**CRYSTAL RIVER - UNIT 3**

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

**License Amendment Request No. 279, Revision 0, Application for Technical Specification Improvement to Eliminate Requirements for Post Accident Sampling System for Babcock and Wilcox Reactors Using the Consolidated Line Item Improvement Process**

**ATTACHMENT C**

**Proposed Technical Specification Changes – Revision Bar**

## 5.6 Procedures, Programs and Manuals

---

### 5.6.2.3 ODCM (continued)

3. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date, (e.g., month/year) the change was implemented.

### 5.6.2.4 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Low Pressure Injection, Reactor Building Spray and Makeup and Purification. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at refueling cycle intervals or less.

### 5.6.2.5 Component Cyclic or Transient Limit

This program provides controls to track the FSAR Table 4.8, cyclic and transient occurrences to ensure that components are maintained within the design limits.

### 5.6.2.6 Not Used

(continued)

## 5.6 Procedures, Programs and Manuals

---

5.6.2.7 Not Used

5.6.2.8 Inservice Inspection Program

This program provides controls for inservice inspection of ASME Code Class 1, 2, 3, MC and CC components, including applicable supports. The program shall include the following:

- a. Provisions that inservice inspection of ASME Code Class 1, 2, 3, MC and CC components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a;
- b. The provisions of SR 3.0.2 are applicable to the frequencies for performing inservice inspection activities;
- c. Inservice inspection of each reactor coolant pump flywheel shall be performed at least once every ten years. The inservice inspection shall be either an ultrasonic examination of the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination for exposed surfaces of the disassembled flywheels. The recommendations delineated in Regulatory Guide 1.14, Positions 3, 4, and 5 of Section C.4.b shall apply.
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.

**PROGRESS ENERGY FLORIDA, INC.**

**CRYSTAL RIVER - UNIT 3**

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

**License Amendment Request No. 279, Revision 0, Application for Technical  
Specification Improvement to Eliminate Requirements for Post Accident  
Sampling System for Babcock and Wilcox Reactors Using the Consolidated  
Line Item Improvement Process**

**ATTACHMENT D**

**Regulatory Commitments**

### Regulatory Commitments

The following table identifies those actions committed to by Progress Energy Florida, Inc. (PEF) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. Sid Powell, Supervisor, Licensing & Regulatory Programs, at (352) 563-4883.

| Regulatory commitments   | Due date/event |
|--|----------------|
| PEF verified that it has contingency plans for obtaining and analyzing highly radioactive samples from the RCS, containment sump, and containment atmosphere. The contingency plans are contained in plant procedures and implementation is complete. Establishment and maintenance of contingency plans is considered a regulatory commitment.                  | Complete.      |
| The capability for classifying fuel damage events at the Alert level threshold has been established for CR-3 at radioactivity levels of > 300 $\mu\text{Ci/gm}$ I-131 dose equivalent. This capability is described in plant procedures and implementation is complete. The capability for classifying fuel damage events is considered a regulatory commitment. | Complete.      |
| PEF verified that it has an ability to assess radioactive iodines released to offsite environs. The capability for monitoring iodines will be maintained within plant procedures. Implementation of this commitment is complete. The capability to monitor radioactive iodines is considered a regulatory commitment.  | Complete.      |