



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

Ref: 10 CFR 170.11(a)(1)

March 31, 2004
3F0304-10

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

Subject: Crystal River Unit 3 – Letter of Intent to Submit a License Amendment Request to Extend Type A Integrated Leakage Rate Testing (ILRT) Surveillance Interval Referencing a New Method for Frequency Determination

Dear Sir:

Florida Power Corporation, doing business as Progress Energy Florida, Inc. (PEF), hereby provides this letter of intent to submit a License Amendment Request (LAR) for Crystal River Unit 3 (CR-3) to extend the Type "A" Integrated Leakage Rate Testing (ILRT) Surveillance Interval, referencing a new method for frequency determination.

CR-3 proposes to submit the LAR for ILRT surveillance extension as a pilot application. Approval of the LAR would allow extension of the ILRT surveillance interval up to twenty years. The proposed surveillance interval is beyond the ten years permitted by Nuclear Energy Institute (NEI 94-01) (1995) and Regulatory Guide 1.163 (1995). CR-3 anticipates submitting the LAR prior to June 30, 2004. NRC approval of the LAR will be needed by July 1, 2005 with 30 days for implementation. The requested approval date and implementation period would allow sufficient time to reschedule Refueling Outage 14 (14R) activities planned for Fall, 2005.

PEF requests that NRC reviews of the submittal be granted a fee waiver pursuant to the provisions of 10 CFR 170.11 specifically:

- The request is to assist in developing an NRC Regulatory Guide to provide/endorse the revised ILRT methodology in accordance with 10 CFR 170.11(a)(1)(ii).
- The request is to support NRC generic regulatory improvements (Risk-informed ILRT frequencies) in accordance with 10 CFR 170.11(a)(1)(iii).

CR-3 participation in this pilot application is contingent on the NRC granting a fee waiver for the full LAR review pursuant to 10 CFR 170.11(b)(1).

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

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

Sincerely,

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

Daniel L. Roderick
Director Site Operations

DLR/lvc

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