Progress Energy

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

Ref: 10 CFR 50.90

July 8, 2004
3F0704-03

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

Subject: Crystal River Unit 3 – License Amendment Request #285, Revision 0
Deletion of One-Time Use Footnotes

References:
1. PEF to NRC letter, dated March 20, 2003, Crystal River Unit 3 – Response to Request for Additional Information and Revision 1 to Proposed License Amendment Request #257, "Emergency Diesel Generator Allowed Outage Time Extension" (TAC No. MB5616)

2. NRC to PEF letter, 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)

3. NRC to PEF letter, dated June 13, 2003, Crystal River Unit 3 - Issuance of Amendment Regarding Technical Specification Change Request for Emergency Diesel Generator Allowed Outage Time Extension (TAC No. MB5616)

4. NRC to PEF letter, dated May 18, 2004, Crystal River Unit 3 - Issuance of Amendment Regarding the Nuclear Services Seawater System (TAC No. MC0119)

Dear Sir:

Florida Power Corporation, doing business as Progress Energy Florida, Inc. (PEF), hereby submits License Amendment Request (LAR) #285, Revision 0, which requests a change to the Crystal River Unit 3 (CR-3) Facility Operating License in accordance with 10 CFR 50.90. LAR #285 revises Technical Specifications (ITS) 3.7.9, 3.7.18 and 3.8.1 to delete one-time use footnotes that have expired or have been utilized. These changes are administrative in nature.

This request fulfills a commitment made in Reference 1 to remove the one-time use footnote for ITS 3.8.1, AC Sources – Operating (Emergency Diesel Generator). The commitment stated that "CR-3 will submit a license amendment request to remove the footnote for the one-time allowance to perform EDG maintenance without alternate AC power."

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

ITS 3.7.9, Nuclear Services Seawater System, and 3.7.18, Control Complex Cooling System, have similar footnotes. These footnotes allowed one-time extension to allowed outage times for their respective ITS Conditions. These footnotes were approved in References 2 through 4. All three footnotes have been utilized and the footnotes for ITS 3.8.1 and 3.7.18 have expired.

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

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/pei

Attachments:

A. Licensee's Evaluation
B. Proposed Revised Improved Technical Specifications Pages – Strikeout/Shadowed Format
C. Proposed Revised Improved Technical Specifications Pages – Revision Bar Format

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 Florida Power Corporation, currently doing business as Progress Energy Florida, Inc. (PEF); 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 8th day of July, 2004, by Dale E. Young.

Signature of Notary Public
State of Florida

JANET SCHROEDER
MY COMMISSION # DD 128063
EXPIRES: June 20, 2006
Bonded Thru Notary Public Underwriters

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

Personally Known ✓ -OR- Produced Identification _____

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT A

LICENSE AMENDMENT REQUEST #285, REVISION 0

Licensee Evaluation

Description of the Proposed License Amendment Request

This license amendment request deletes three one-time use footnotes that have expired or have been utilized. The following footnotes are requested to be deleted:

A one-time use footnote to ITS 3.7.18, Condition A, Required Action A.2, Completion Time:

> "*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."

A one-time use footnote to ITS 3.8.1, Condition B, Required Action B.4, Completion Time:

> "*On a one-time basis, each EDG may be inoperable for up to 14 days without alternate AC available. The ability to apply the one-time 14-day Completion Time to each EDG will expire on May 15, 2004."

A one-time use footnote to ITS 3.7.9, Condition A, Required Action A.1, Completion Time:

> "*On a one-time basis, a Nuclear Services Seawater System train may be inoperable for up to 10 days to allow performance of Nuclear Services Seawater System Emergency Pump RWP-2A or RWP-2B repairs. The ability to apply the 10-day Completion Time will expire on December 30, 2004."

Background

A one-time use footnote to ITS 3.7.18, Condition A, Required Action A.2, Completion Time was added in Amendment No. 200. This amendment permitted an increased allowed outage time (AOT) to perform maintenance on each train of control complex chillers.

A one-time use footnote to ITS 3.8.1, Condition B, Required Action B.4, Completion Time was added in Amendment No. 207. This footnote allowed a one-time 14-day AOT for each emergency diesel generator (EDG) to permit on-line maintenance prior to installation of an alternate AC source.

The one-time use footnote to ITS 3.7.9, Condition A, Required Action A.1, Completion Time was added in Amendment No. 212. This footnote allowed a 10-day AOT to perform maintenance on the "B" train Raw Water pump (RWP-2B).

Technical and Regulatory Analysis

The proposed change deletes three ITS footnotes. Each footnote was added to permit an allowed outage time longer than existing requirements to perform maintenance on equipment. The activities supported by the footnotes were performed and, therefore, the footnotes have no further utility. Deleting the footnotes is administrative in nature and does not affect plant equipment or operation.

The use of footnotes is minimized in the ITS. In order to improve clarity, obsolete footnotes are routinely deleted. In addition, CR-3 committed to delete the footnote for Improved Technical Specification (ITS) 3.8.1. This amendment request fulfills that commitment.

No Significant Hazards Consideration Determination

License Amendment Request (LAR) #285, Revision 0, proposes to delete one-time use footnotes that have expired or have been used from ITS 3.8.1, AC Sources – Operating (Emergency Diesel Generator), ITS 3.7.9, Nuclear Services Seawater System, and ITS 3.7.18, Control Complex Cooling System. This change is administrative in nature and does not alter any operating license requirements. 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 evaluated.

Each footnote was added to ITS through the license amendment process. The activities supported by the footnotes were performed and, therefore, the footnotes have no further utility. Deleting the footnotes is administrative in nature and does not affect plant conditions that could impact accident probability or consequences. Therefore, granting this LAR 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 evaluated.

The proposed license amendment deletes footnotes that were used on a one-time basis for several specifications. The proposed LAR will not result in changes to the design, physical configuration of the plant or the assumptions made in the safety analysis. 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.

The deletion of the footnotes from the ITS does not affect properties of plant components or their operation. Therefore, granting this LAR does not involve a significant reduction in the margin of safety.

Based on the above, Progress Energy Florida, Inc. (PEF) concludes that the proposed LAR presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

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.

PEF has reviewed proposed License Amendment Request #285, Revision 0, 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.

References

1. Amendment No. 200, 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)

2. Amendment No. 207, dated June 13, 2003, Crystal River Unit 3 - Issuance of Amendment Regarding Technical Specification Change Request for Emergency Diesel Generator Allowed Outage Time Extension (TAC No. MB5616)

3. Amendment No. 212, dated May 18, 2004, Crystal River Unit 3 - Issuance of Amendment Regarding the Nuclear Services Seawater System (TAC No. MC0119)

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT B

LICENSE AMENDMENT REQUEST #285, REVISION 0

Proposed Revised Improved Technical Specifications Pages

Strikeout/Shadowed Format

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

3.7 PLANT SYSTEMS

3.7.9 Nuclear Services Seawater System

LCO 3.7.9 Two Nuclear Services Seawater System trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Nuclear Services Seawater System train inoperable.	A.1 Restore Nuclear Services Seawater System train to OPERABLE status.	72 ± hours
B. Required Action and associated Completion Time not met.	B.1 Be in Mode 3 AND B.2 Be in Mode 5.	6 hours 36 hours

~~*On a one-time basis, a Nuclear Services Seawater System train may be inoperable for up to 10 days to allow performance of Nuclear Services Seawater System Emergency Pump RWP-2A or RWP-2B repairs. The ability to apply the 10-day Completion Time will expire on December 30, 2004.~~

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.~~

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.3.1 Determine OPERABLE EDG is not inoperable due to common cause failure. OR B.3.2 Perform SR 3.8.1.2 for OPERABLE EDG. AND B.4 Restore EDG to OPERABLE status	24 hours 24 hours 72 Hours AND 6 days from discovery of failure to meet LCO OR 14 days if alternate AC power is available* AND 17 days from discovery of failure to meet LCO

(continued)

~~* On a one-time basis, each EDG may be inoperable for up to 14 days without alternate AC available. The ability to apply the one-time 14-day Completion Time to each EDG will expire on May 15, 2004.~~

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT C

LICENSE AMENDMENT REQUEST #285, REVISION 0

Proposed Revised Improved Technical Specifications Pages

Revision Bar Format

3.7 PLANT SYSTEMS

3.7.9 Nuclear Services Seawater System

LCO 3.7.9 Two Nuclear Services Seawater System trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Nuclear Services Seawater System train inoperable.	A.1 Restore Nuclear Services Seawater System train to OPERABLE status.	72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in Mode 3 AND B.2 Be in Mode 5.	6 hours 36 hours

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

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.3.1 Determine OPERABLE EDG is not inoperable due to common cause failure. OR B.3.2 Perform SR 3.8.1.2 for OPERABLE EDG. AND B.4 Restore EDG to OPERABLE status	24 hours 24 hours 72 Hours AND 6 days from discovery of failure to meet LCO OR 14 days if alternate AC power is available AND 17 days from discovery of failure to meet LCO

(continued)