



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

Ref: 10 CFR 50.90

February 11, 2005  
3F0205-03

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

**Subject:** Crystal River Unit 3 – Supplemental Information Regarding Risk Significant Fire Zones and Fire Zone Specific Compensatory Actions for License Amendment Request #289, Revision 0, Revised Improved Technical Specifications (ITS) 3.5.2, Emergency Core Cooling Systems (ECCS) - Operating, 3.6.6, Reactor Building Spray and Containment Cooling Systems, 3.7.8, Decay Heat Closed Cycle Cooling Water (DC) System and 3.7.10, Decay Heat Seawater System

**Reference:** PEF to NRC letter dated January 13, 2005, Crystal River Unit 3 - License Amendment Request #289, Revision 0, Revised Improved Technical Specifications (ITS) 3.5.2, Emergency Core Cooling Systems (ECCS) - Operating, 3.6.6, Reactor Building Spray and Containment Cooling Systems, 3.7.8, Decay Heat Closed Cycle Cooling Water (DC) System and 3.7.10, Decay Heat Seawater System

Dear Sir:

Florida Power Corporation, doing business as Progress Energy Florida, Inc. (PEF), hereby submits Supplemental Information and Additional Regulatory Commitments for License Amendment Request (LAR) #289, Revision 0.

Attachment A to this submittal provides supplemental information concerning fire detection, suppression, ignition sources, and combustible loads. The information also includes compensatory measures for risk significant fire zones and operational controls to be practiced for the duration of the maintenance activity to return Decay Heat Seawater Pump RWP-3B to full qualification. This information fulfills a commitment made in the referenced letter.

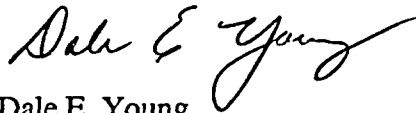
A list of regulatory commitments is included in Attachment B. CR-3 will implement the provisions described in these additional commitments during the proposed one-time extended allowed outage time (AOT).

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

A001  
A006

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/lvc

Attachments:

- A. Supplemental Information Regarding Risk Significant Fire Zones and Fire Zone Specific Compensatory Actions
- B. 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 Florida Power Corporation, 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.

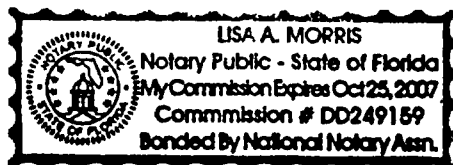
Dale E. Young

Dale E. Young  
Vice President  
Crystal River Nuclear Plant

The foregoing document was acknowledged before me this 11<sup>th</sup> day of February, 2005, 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**

**ATTACHMENT A**

**LICENSE AMENDMENT REQUEST #289, REVISION 0**

**Supplemental Information Regarding Risk Significant Fire Zones and Fire  
Zone Specific Compensatory Actions**

### Background

The following pages list fire zones that have been identified in the Probabilistic Risk Assessment submitted to the NRC in Attachment C to License Amendment Request # 289, Revision 0 dated January 13, 2005, as areas that could potentially impact plant capabilities while Decay Heat Seawater Pump RWP-3B is out-of-service for an extended allowed outage time (AOT) beyond 72 hours.

The fire zones listed herein were identified from the Crystal River Unit 3 (CR-3) Individual Plant Examination of External Events (IPEEE) and the CR-3 Appendix R Fire Study. For each of these areas, supplemental information concerning fire detection, suppression, ignition sources, and combustible loads is hereby provided. Walkdowns will be conducted prior to beginning work on RWP-3B in risk significant areas to identify and remove transient combustible materials. Specific compensatory actions that will be taken during the RWP-3B maintenance activity are provided for each of the fire zones listed. These actions supplement those compensatory actions provided in the referenced letter. These compensatory actions will reduce the risk associated with the maintenance activity to return Decay Heat Seawater Pump RWP-3B to full qualification. Operational controls for reducing risk during RWP-3B maintenance activity are also included for each fire zone.

### Reference

PEF to NRC letter dated January 13, 2005; Crystal River Unit 3 - License Amendment Request #289, Revision 0, Revised Improved Technical Specifications (ITS) 3.5.2, Emergency Core Cooling Systems (ECCS) - Operating, 3.6.6, Reactor Building Spray and Containment Cooling Systems, 3.7.8, Decay Heat Closed Cycle Cooling Water (DC) System and 3.7.10, Decay Heat Seawater System

| <b>Fire Zone: AB-75-5 Decay Heat Pit 3A</b>   |                              |  |   |
|---|------------------------------|--|---|
| <b>Detection</b>  | <b>Automatic Suppression</b> | <b>Ignition Sources in IPEEE Model</b>   | <b>Combustible Loading and Type</b>   |
| Ionization detectors are installed in the area to provide for early warning of any fire that may occur.   | None                         | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• Decay Heat Pump DHP-1A</li> <li>• Building Spray Pump BSP-1A</li> </ul> | <p>1917 Btu/ft<sup>2</sup> consisting predominantly of the following insitu loads:</p> <p>Tray cable, lubricant oil and EOP required materials.</p> |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> </ul>  |                              |  |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• No Planned Maintenance on DHP-1A or BSP-1A</li> <li>• No planned or unnecessary operation of DHP-1A or BSP-1A</li> </ul> |                              |  |   |

| <b>Fire Zone: AB-95-3AA Makeup Pump (MUP) Room 3B</b>  |  |  |   |
|--|--|--|---|
| <b>Detection</b>   | <b>Automatic Suppression</b>   | <b>Ignition Sources in IPEEE Model</b>   | <b>Combustible Loading and Type</b>   |
| An ionization detector is provided in the pump space to give early warning of any fire that may occur.   | Wet pipe sprinkler, east corridor of the room in the corridor connecting the three MUP spaces. | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• MUP-1B</li> </ul> | <p>7,878 Btu/ft<sup>2</sup> consisting predominantly of the following insitu loads:</p> <p>Lubricating oil.</p> |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul>  |  |  |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• The makeup pump configuration will be selected based on minimizing the risk from internal events as a result of redundancy in its cooling water source.</li> <li>• No Planned Maintenance on MUP-1B.</li> </ul> |  |  |   |

| <b>Fire Zone: AB-95-3C West Hallway</b>   |   |   |   |
|---|---|---|---|
| <b>Detection</b>  | <b>Automatic Suppression</b>  | <b>Ignition Sources in IPEEE Model</b>  | <b>Combustible Loading and Type</b>   |
| Ionization detectors are provided to give early warning of any fire that may occur.   | Wet-pipe sprinkler system, designed to Ordinary Hazard Group II criteria. | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• Motor Control Center (MCC) Makeup Valves (MUV)-23/24</li> <li>• MCC MUV-25/26</li> </ul> | 19,887 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Tray cable and TSI. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul> |   |   |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required</li> </ul>   |   |   |   |

| <b>Fire Zone: AB-95-3E Makeup Pump (MUP) Room 3A</b>   |  |  |   |
|--|--|--|---|
| <b>Detection</b>   | <b>Automatic Suppression</b>   | <b>Ignition Sources in IPEEE Model</b>   | <b>Combustible Loading and Type</b>   |
| An ionization detector is provided in the pump space to give early warning of any fire that may occur.   | Wet pipe sprinkler, east corridor of the room in the corridor connecting the three MUP spaces. | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• MUP-1A</li> </ul> | 6,692 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Lubricating oil. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul>  |  |  |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• The makeup pump configuration will be selected based on minimizing the risk from internal events as a result of redundancy in its cooling water source.</li> <li>• No Planned Maintenance on MUP-1A.</li> </ul> |  |  |   |

| <b>Fire Zone: AB-95-3F Make-Up Pump Room 3C</b>  |  |  |   |
|--|--|--|---|
| <b>Detection</b>   | <b>Automatic Suppression</b>   | <b>Ignition Sources in IPEEE Model</b>   | <b>Combustible Loading and Type</b>   |
| An ionization detector is provided in the pump space to give early warning of any fire that may occur.   | Wet pipe sprinkler, east corridor of the room in the corridor connecting the three MUP spaces. | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• MUP-1C</li> </ul> | <p>7,965 Btu/ft<sup>2</sup> consisting predominantly of the following insitu loads:</p> <p>Lubricating oil.</p> |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul>  |  |  |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• The makeup pump configuration will be selected based on minimizing the risk from internal events as a result of redundancy in its cooling water source.</li> <li>• No Planned Maintenance on MUP-1C.</li> </ul> |  |  |   |



| <b>Fire Zone: AB-95-3G Central Hallway</b>  |  |  |   |
|---|--|--|---|
| <b>Detection</b>  | <b>Automatic Suppression</b>               | <b>Ignition Sources in IPEEE Model</b>   | <b>Combustible Loading and Type</b>   |
| Ionization detectors are provided.  | Wet-pipe sprinkler system throughout zone. | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• HTCP-1 (Misc. Waste Evap. Package Control Panel)</li> <li>• HTCP-4 (EDG-3A Emergency Load Shedding-Heat Tracing)</li> <li>• HTTR-4B (480/208-120V Heat Tracing Transformer 3-3B)</li> <li>• MTMC-3 (480V Engineered Safeguards MCC-3A1)</li> <li>• MTMC-6 (480V Engineered Safeguards MCC-3B2)</li> <li>• MTMC-18 (480V Reactor MCC-3A2)</li> <li>• MTMC-19 (480V Reactor MCC-3B2)</li> <li>• RMA-3 (Aux Building Ventilation Exhaust Duct Monitor)</li> <li>• Waste Disp. PNL's</li> <li>• WDCP-1 (Ultra Filtration Skid Control Panel)</li> <li>• WDCP-2 (Variable Speed Controller for WDP-11)</li> <li>• WDTR-1 (Transformer for WDCP-2 Waste Disp. Control Panel)</li> </ul> | <p>90,548 Btu/ft<sup>2</sup> consisting predominantly of the following insitu loads:</p> <p>Tray cable and TSI.</p> |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul> |  |  |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>  |  |  |   |

| Fire Zone: AB-95-3K  |                       | Miscellaneous Radiation Waste Rooms & Hallway                            |   |
|--|-----------------------|--|---|
| Detection  | Automatic Suppression | Ignition Sources in IPEEE Model  | Combustible Loading and Type  |
| None   | None                  | <ul style="list-style-type: none"> <li>Transient combustibles</li> </ul> | 12,774 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Tray cable and TSI. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>Transient combustibles will be minimized.</li> <li>No hot or spark producing work will be conducted.</li> </ul>   |                       |  |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>None Required.</li> </ul>   |                       |  |   |
| <b>Note:</b><br>This is a locked high radiation area. No roving hourly fire watch will be conducted. Following inspection for and removal of transient combustible materials, the area will be locked and entry limited to operationally necessary activities only, and require inspection for transient combustible materials upon exit. Keys to the area can be obtained from Health Physics (HP). |                       |  |   |

| Fire Zone: AB-95-3L   |                       | Waste Evaporator   |   |
|---|-----------------------|--|---|
| Detection   | Automatic Suppression | Ignition Sources in IPEEE Model  | Combustible Loading and Type  |
| None  | None                  | <ul style="list-style-type: none"> <li>Transient combustibles</li> <li>ASP-2A / 2B (Waste Evaporator Condensate Return Pumps)</li> </ul> | 18,189 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Tray cable. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>Transient combustibles will be minimized.</li> <li>No hot or spark producing work will be conducted.</li> <li>Roving hourly fire watches will be conducted.</li> </ul> |                       |  |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>None Required.</li> </ul>  |                       |  |   |
| <b>Note:</b> <ul style="list-style-type: none"> <li>The Waste Evaporator is not used.</li> </ul>  |                       |  |   |

| Fire Zone: AB-95-3M  |                       | Waste Evaporator Room  |  |
|--|-----------------------|--|--|
| Detection  | Automatic Suppression | Ignition Sources in IPEEE Model  | Combustible Loading and Type   |
| None   | None                  | <ul style="list-style-type: none"> <li>Transient combustibles</li> </ul> | 18,664 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Tray cable, lubricating oil, plastic and wood. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>Transient combustibles will be minimized.</li> <li>No hot or spark producing work will be conducted.</li> </ul>   |                       |  |  |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>None Required.</li> </ul>   |                       |  |  |
| <b>Note:</b><br>No roving hourly fire watch will be conducted. Following inspection for and removal of transient combustible materials, the area will be secured and entry limited to operationally necessary activities only, and require inspection for transient combustible materials upon exit. Keys to the area can be obtained from HP. |                       |  |  |

| Fire Zone: AB-95-3N   |                       | Reactor Coolant Evaporator Room  |   |
|---|-----------------------|--|---|
| Detection   | Automatic Suppression | Ignition Sources in IPEEE Model  | Combustible Loading and Type  |
| None  | None                  | <ul style="list-style-type: none"> <li>Transient combustibles</li> </ul> | 20,769 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Tray cable, lubricating oil, and rubber material. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>Transient combustibles will be minimized.</li> <li>No hot or spark producing work will be conducted.</li> </ul>  |                       |  |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>None Required.</li> </ul>  |                       |  |   |
| <b>Note:</b><br>No roving hourly fire watch will be conducted. Following inspection for and removal of transient combustible materials, the area will be locked and entry limited to operationally necessary activities only, and require inspection for transient combustible materials upon exit. Keys to the area can be obtained from HP. |                       |  |   |

| Fire Zone: AB-95-3P   |                       | Waste & Recycle Pump Rooms  |  |
|---|-----------------------|---|--|
| Detection   | Automatic Suppression | Ignition Sources in IPEEE Model   | Combustible Loading and Type   |
| None  | None                  | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• WDP-12A/B (Concentrated Radioactive Liquid Waste Pumps)</li> <li>• WDP-13A/B (Boric Acid Recycle Pumps)</li> </ul> | 19,007 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Tray cable and grease. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul>                   |                       |   |  |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• No Planned Maintenance on WDP-12A/B or WDP-13A/B.</li> <li>• No planned or unnecessary operation of WDP-12A/B or WDP-13A/B.</li> </ul> |                       |   |  |
| <b>Note:</b><br>WDP-12A/B and WDP-13A/B will only be operated when there is a qualified fire watch in the immediate vicinity of the operating pump equipped with a radio and fire extinguisher.   |                       |   |  |

| Fire Zone: AB-95-3Q   |                       | Concentrate Tank Room  |  |
|---|-----------------------|--|--|
| Detection   | Automatic Suppression | Ignition Sources in IPEEE Model  | Combustible Loading and Type   |
| None  | None                  | <ul style="list-style-type: none"> <li>• Transient combustibles</li> </ul> | 9,074 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Tray cable and rubber |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> </ul>  |                       |  |  |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>  |                       |  |  |
| <b>Note:</b><br>This is a locked high radiation area. No roving hourly fire watch will be conducted. Following inspection for and removal of transient combustible materials, the area will be locked and entry limited to operationally necessary activities only, and require inspection for transient combustible materials upon exit. Keys to the area can be obtained from HP. |                       |  |  |

| Fire Zone: AB-95-3R   |                       | Waste Gas Rooms  |  |
|---|-----------------------|--|--|
| Detection   | Automatic Suppression | Ignition Sources in IPEEE Model  | Combustible Loading and Type   |
| None  | None                  | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• HAYES CAB</li> <li>• HTDP-1A (208-120V Heat Tracing Distribution Panel)</li> <li>• HTDP-1B (208-120V HT Distribution Panel)</li> <li>• HTDP-4A (208-120V HT Distribution Panel)</li> <li>• HTRR-1A (480/208-120V Heat Tracing Transformer 3-1A)</li> <li>• HTRR-1B (480/208-120V Heat Tracing Transformer 3-1B)</li> <li>• HTRR-4A (480/208-120V Heat Tracing Transformer 3-4A)</li> <li>• WDP-1B (Waste Gas Compressor)</li> </ul> | <p>23,141 Btu/ft<sup>2</sup> consisting predominantly of the following insitu loads:</p> <p>Tray cable and rubber.</p> |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul> |                       |  |  |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>  |                       |  |  |

| Fire Zone: AB-95-3T Reactor Coolant Bleed Tank Room   |  |  |  |
|---|--|--|--|
| Detection   | Automatic Suppression  | Ignition Sources in IPEEE Model  | Combustible Loading and Type   |
| None  | Wet-pipe sprinkler system installed along the length of the entry hallway. | <ul style="list-style-type: none"> <li>Transient combustibles</li> </ul> | 1,053 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Cable tray. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>Transient combustibles will be minimized.</li> <li>No hot or spark producing work will be conducted.</li> <li>The portion of the zone that cannot be locked will be observed by the roving fire watch.</li> </ul>  |  |  |  |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>None Required.</li> </ul>  |  |  |  |
| <b>Note:</b><br>Much of this area is a locked high radiation area. The portion of the fire zone that can be locked will be locked and the keys will be administratively controlled. Entries will be limited to only operationally necessary activities and require inspection for transient combustible materials upon exit. The portion of the zone that cannot be locked will be observed by the roving fire watch. Keys to the area can be obtained from HP. |  |  |  |

| Fire Zone: AB-95-3U Decant and Slurry Pump Room   |                       |  |   |
|---|-----------------------|--|---|
| Detection   | Automatic Suppression | Ignition Sources in IPEEE Model  | Combustible Loading and Type  |
| None  | None                  | <ul style="list-style-type: none"> <li>Transient combustibles</li> </ul> | 58,467 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Tray cable and lubricant oil. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>Transient combustibles will be minimized.</li> <li>No hot or spark producing work will be conducted.</li> <li>The portion of the zone that cannot be locked will be observed by the roving fire watch.</li> </ul>  |                       |  |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>None Required</li> </ul>   |                       |  |   |
| <b>Note:</b><br>Much of this area is a locked high radiation area. The portion of the fire zone that can be locked will be locked and the keys will be administratively controlled. Entries will be limited to only operationally necessary activities and require inspection for transient combustible materials upon exit. The portion of the zone that cannot be locked will be observed by the roving fire watch. Keys to the area can be obtained from HP. |                       |  |   |

| <b>Fire Zone: AB-95-3W</b>  |                              | <b>Waste Transfer Pump Rooms</b>  |   |
|---|------------------------------|---|---|
| <b>Detection</b>  | <b>Automatic Suppression</b> | <b>Ignition Sources in IPEEE Model</b>  | <b>Combustible Loading and Type</b>   |
| None  | None                         | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• WDP-5A/5B/5C (Waste Transfer Pumps)</li> </ul> | 102,236 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Tray cable, PVC lubricant oil and TSI. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul> |                              |   |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• No Planned Maintenance on WDP-5A/5B/5C</li> <li>• No unnecessary operation of WDP-5A/5B/5C</li> </ul>                |                              |   |   |
| <b>Note:</b><br>The Waste Transfer Pumps will only be operated when there is a qualified fire watch in the immediate vicinity of the operating pump equipped with a radio and fire extinguisher.  |                              |   |   |

| <b>Fire Zone: AB-95-3Y</b>   |                              | <b>RCP Seal Injection Filter Room</b>  |   |
|--|------------------------------|--|---|
| <b>Detection</b>   | <b>Automatic Suppression</b> | <b>Ignition Sources in IPEEE Model</b>   | <b>Combustible Loading and Type</b>   |
| None   | None                         | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• ES CAB 3A4</li> </ul> | 32,166 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Tray cable, TSI, rubber, plastics and fiberglass. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> </ul>   |                              |  |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>   |                              |  |   |
| <b>Note:</b><br>No roving hourly fire watch will be conducted. Following inspection for and removal of transient combustible materials, the area will be secured and entry limited to operationally necessary activities only, and require inspection for transient combustible materials upon exit. Keys to the area can be obtained from HP. |                              |  |   |

| Fire Zone: AB-95-3Z   |   | Nuclear Services Seawater (RW) and Nuclear Services Closed Cycle Cooling Water (SW) Pump Room  |   |
|---|---|--|---|
| Detection   | Automatic Suppression   | Ignition Sources in IPEEE Model  | Combustible Loading and Type  |
| Ionization detectors  | Wet-pipe sprinkler system covering the entire zone, except for the heat exchanger area. | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• AHF-15B (Decay Heat Closed Cycle Air Handling Fan)</li> <li>• RWP-2B</li> <li>• RWP-3A</li> <li>• SWP-1A</li> <li>• SWP-1B</li> </ul> | <p>3,438 Btu/ft<sup>2</sup> consisting predominantly of the following insitu loads:</p> <p>Tray cable, TSI, lubricant oil, grease, rubber, plastics and fiberglass.</p> |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted on equipment other than RWP-3B related work.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul> |   |  |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• See Note.</li> </ul>   |   |  |   |
| <b>Note:</b><br>This is the area where work will predominantly take place for RWP-3B. Personnel will generally be in the area around the clock while in the action statement and hot work will be conducted in accordance with station procedures.  |   |  |   |



| <b>Fire Zone: AB-119-6A North Hallway</b>   |   |   |   |
|---|---|---|---|
| <b>Detection</b>  | <b>Automatic Suppression</b>  | <b>Ignition Sources in IPEEE Model</b>  | <b>Combustible Loading and Type</b>   |
| Ionization detectors  | <p>Wet-pipe sprinkler system. The sprinklers are located at two elevations; in the overhead and under the cable trays.</p> <p>The stairway opening in the floor in the northeast portion of the zone is protected by close-spaced sprinklers and draft curtains located in the fire zone below.</p> | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• Small Hydrogen Line</li> </ul> | <p>282,350 Btu/ft<sup>2</sup> consisting predominantly of the following insitu loads:</p> <p>Tray cable, TSI, and fiberglass.</p> |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul> |   |   |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>  |   |   |   |

| <b>Fire Zone: AB-119-6E East Hallway</b>  |   |  |  |
|---|---|--|--|
| <b>Detection</b>  | <b>Automatic Suppression</b>                        | <b>Ignition Sources in IEEE Model</b>  | <b>Combustible Loading and Type</b>  |
| Ionization detectors  | Wet-pipe sprinkler system covering the entire zone. | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• Small Hydrogen Line</li> <li>• MTMC-4 (480V Engineered Safeguards MCC-3A2)</li> <li>• MTMC-21 (480V Engineered Safeguards MCC-3A3)</li> </ul> | 179,008 Btu/ft <sup>2</sup> consisting predominantly of the following insitu loads:<br><br>Tray cable, TSI, and snubber oil. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul> |   |  |  |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>  |   |  |  |

| <b>Fire Zone: CC-108-102 Hallway And Remote Shutdown Room</b>  |                              |   |   |
|--|------------------------------|---|---|
| <b>Detection</b>   | <b>Automatic Suppression</b> | <b>Ignition Sources in IEEE Model</b>   | <b>Combustible Loading and Type</b>   |
| Ionization detectors   | None                         | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• AHF-69 (Room Cooler Fan)</li> <li>• Remote Shutdown Panel</li> </ul> | 110,707 Btu/ft <sup>2</sup> consisting principally of cable insulation and Thermo-Lag material, with small amounts of rubber, plastic and fiberglass. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• A Fire Brigade Qualified individual will be stationed on the 108 Elevation.</li> <li>• The individual's turnout gear will be available on the 108 Elevation. A fire hose station is also located in the 108 Elevation equipped with an electrically safe fog nozzle.</li> </ul> |                              |   |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>   |                              |   |   |

| <b>Fire Zone: CC-108-104 Plant Battery Room 3A</b>   |                              |  |  |
|--|------------------------------|--|--|
| <b>Detection</b>   | <b>Automatic Suppression</b> | <b>Ignition Sources in IPEEE Model</b>                                     | <b>Combustible Loading and Type</b>  |
| Ionization detectors   | None                         | <ul style="list-style-type: none"> <li>• Transient combustibles</li> </ul> | 116,779 Btu/ft <sup>2</sup> consisting principally of cable insulation and Thermo-Lag material, with small amounts of rubber, plastic and battery cases. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• A Fire Brigade Qualified individual will be stationed on the 108 Elevation.</li> <li>• The individual's turnout gear will be available on the 108 Elevation. A fire hose station is also located in the 108 Elevation equipped with an electrically safe fog nozzle.</li> </ul> |                              |  |  |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>   |                              |  |  |

| <b>Fire Zone: CC-108-106 Battery Charger Room 3A</b>   |                              |  |   |
|--|------------------------------|--|---|
| <b>Detection</b>   | <b>Automatic Suppression</b> | <b>Ignition Sources in IPEEE Model</b>   | <b>Combustible Loading and Type</b>   |
| Ionization detectors   | None                         | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• DPBC-1A (Battery Charger)</li> <li>• DPBC-1C (Battery Charger)</li> <li>• DPBC-1E (Battery Charger)</li> <li>• DPDP-1A</li> </ul> | 157,463 Btu/ft <sup>2</sup> ft <sup>2</sup> consisting principally of cable insulation and Thermo-Lag material, with small amounts of rubber, plastic and fiberglass. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• A Fire Brigade Qualified individual will be stationed on the 108 Elevation.</li> <li>• The individual's turnout gear will be available on the 108 Elevation. A fire hose station is also located in the 108 Elevation equipped with an electrically safe fog nozzle.</li> </ul> |                              |  |   |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>   |                              |  |   |

| Fire Zone: CC-108-108 4160 ES Switchgear Bus Room 3A   |                       |   |  |
|--|-----------------------|---|--|
| Detection  | Automatic Suppression | Ignition Sources in IPEEE Model   | Combustible Loading and Type   |
| Ionization detectors are installed throughout the area to provide for early warning of fire.   | None                  | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• 4160V bus and switchgear</li> <li>• DC distribution panel</li> <li>• Relay panels</li> <li>• MTTR-4 (37.5 KVA 480-240/120V Transformer)</li> <li>• AHF-72 - Cooling Coil Fan motor (1/10 HP, 115V, 60Hz)</li> <li>• CAIT-1 (Pass Computer Inverter)</li> </ul> | 90,036 Btu/ft <sup>2</sup> consisting principally of cable insulation and Thermo-Lag material, with small amounts of rubber, plastic and fiberglass. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• A Fire Brigade Qualified individual will be stationed on the 108 Elevation.</li> <li>• The individual's turnout gear will be available on the 108 Elevation. A fire hose station is also located in the 108 Elevation equipped with an electrically safe fog nozzle.</li> </ul> |                       |   |  |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>   |                       |   |  |
| <b>Note:</b><br>Switchgear for 4160V Engineered Safeguards components make this room significant since it is required for support of numerous internal events and post-fire safe shutdown safety functions.  |                       |   |  |

| <b>Fire Zone: CC-108-110 Inverter Room 3A</b>  |                              |  |  |
|--|------------------------------|--|--|
| <b>Detection</b>   | <b>Automatic Suppression</b> | <b>Ignition Sources in IEEE Model</b>  | <b>Combustible Loading and Type</b>  |
| Ionization detectors are installed throughout the area to provide for early warning of fire.   | None                         | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• AHHE-54 (Room A Cooling)</li> <li>• AHHE-55 (Room A Cooling)</li> <li>• VBDP-12 (120 VOLT Regulated Distribution Pnls)</li> <li>• VBDP-13 (12 (120 VOLT Regulated Distribution Pnls)</li> <li>• VBIT-1A (Dual Input Inverter 3A (30 KVA))</li> <li>• VBIT-1C (Dual Input Inverter 3C (30 KVA))</li> <li>• VBTR-2A (Transformer)</li> <li>• VBTR-2C (Transformer)</li> <li>• VBTR-3A (Transformer)</li> <li>• VBTR-3C (Transformer)</li> <li>• VBXS-1A (Transfer Switch)</li> <li>• VBXS-1C (Transfer Switch)</li> <li>• VBXS-3A (Transfer Switch)</li> <li>• VBXS-3C (Transfer Switch)</li> </ul> | 60,096 Btu/ft <sup>2</sup> consisting principally of cable insulation and Thermo-Lag material, with small amounts of rubber, plastic and fiberglass. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• A Fire Brigade Qualified individual will be stationed on the 108 Elevation.</li> <li>• The individual's turnout gear will be available on the 108 Elevation. A fire hose station is also located in the 108 Elevation equipped with an electrically safe fog nozzle.</li> </ul> |                              |  |  |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>   |                              |  |  |

| <b>Fire Zone: CC-124-111 CRD &amp; Communication Equip Room</b>   |   |  |  |
|---|---|--|--|
| <b>Detection</b>  | <b>Automatic Suppression</b>                        | <b>Ignition Sources in IPEEE Model</b>   | <b>Combustible Loading and Type</b>  |
| Ionization detectors are installed throughout the area to provide for early warning of fire.  | Wet-pipe sprinkler system covering the entire zone. | <ul style="list-style-type: none"> <li>• Transient Combustibles</li> <li>• Miscellaneous Control Rod Drive (CRD) electrical equipment: CRD Voltage Reg, CRD Breaker Cabinets, CRDM Group Power Supply Cabinets, Control Cabinets, Logic Cabinets, Etc.</li> <li>• AHF-54A (Room Cooler)</li> <li>• Distribution Panels</li> <li>• Lighting Transformers</li> <li>• MUX Cabinets</li> </ul> | 25,031 Btu/ft <sup>2</sup> consisting principally of cable insulation and Thermo-Lag material, with small amounts of rubber, plastic and fiberglass. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul> |   |  |  |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>  |   |  |  |

| <b>Fire Zone: CC-124-117 480V ES Switchgear Bus Room 3A</b>   |                              |  |  |
|---|------------------------------|--|--|
| <b>Detection</b>  | <b>Automatic Suppression</b> | <b>Ignition Sources in IPEEE Model</b>   | <b>Combustible Loading and Type</b>  |
| Ionization detectors are installed to provide for early warning of fire   | None                         | <ul style="list-style-type: none"> <li>• Transient combustibles</li> <li>• AHF-74 (Room Cooler)</li> <li>• AHF-75 (Room Cooler)</li> <li>• Distribution Panels</li> <li>• ES MCC 3AB/TS</li> <li>• MTSW-3F</li> <li>• MTSW-3F R1, R2, R3</li> <li>• RC RCITS-A &amp; C</li> <li>• TRANS-117-A - G</li> </ul> | 46,528 Btu/ft <sup>2</sup> consisting principally of cable insulation, with small amounts of rubber and plastic. |
| <b>Compensatory Measures:</b> <ul style="list-style-type: none"> <li>• Transient combustibles will be minimized.</li> <li>• No hot or spark producing work will be conducted.</li> <li>• Roving hourly fire watches will be conducted.</li> </ul> |                              |  |  |
| <b>Operational Controls for Reducing Risk During RWP-3B Refurbishment Activity:</b> <ul style="list-style-type: none"> <li>• None Required.</li> </ul>  |                              |  |  |

**PROGRESS ENERGY FLORIDA, INC.**

**CRYSTAL RIVER UNIT 3**

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

**ATTACHMENT B**

**LICENSE AMENDMENT REQUEST #289, REVISION 0**

**List of Regulatory Commitments**



### List of Regulatory Commitments

The following table identifies those actions committed to by Progress Energy Florida (PEF) in this document. Any other actions discussed in the submittal represent intended or planned actions by PEF. 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.

| Commitment   | Due Date  |
|--|---|
| Specific compensatory actions that will be taken during the RWP-3B maintenance activity are provided for each of the fire zones listed. These actions supplement those compensatory actions provided in the referenced letter. These compensatory actions will reduce the risk associated with the maintenance activity to return Decay Heat Seawater Pump RWP-3B to full qualification. | During one-time extended (greater than 72 hours) RWP-3B maintenance |