



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

Ref: 10CFR50.90

February 25, 2008
3F0208-01

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

Subject: Crystal River Unit 3 – License Amendment Request #295, Revision 0: Extension of Allowed Outage Time to Seven Days and Elimination of Second Completion Times – Response to Request for Additional Information (TAC No. MD5241)

Reference: CR3 to NRC letter dated April 13, 2007, “Crystal River Unit 3 – License Amendment Request #295, Revision 0, Extension of Allowed Outage Time to Seven Days and Elimination of Second Completion Times Limiting Time”

Dear Sir:

Pursuant to the referenced document, Florida Power Corporation (FPC), doing business as Progress Energy Florida, Inc., submitted License Amendment Request (LAR) #295 which proposed changes to the Crystal River Unit 3 (CR3) Improved Technical Specifications (ITS) to allow the deletion of second completion times. Included in the referenced document was a discussion of administrative controls. As a result of a telecon conducted on January 30, 2008, between the NRC Project Manager and CR3 Licensing personnel, FPC is providing additional information related to administrative controls proposed by LAR #295.

Page 3 of Enclosures C and D of the referenced document proposes to revise ITS Example 1.3-3 by eliminating the second Completion Times and replacing the discussion regarding second Completion Times with the following text:

“It is possible to alternate between Condition A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. However, doing so would be inconsistent with the basis of the Completion Times. Therefore, there shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended.”

The administrative controls described in the above insert will be captured by the following new licensing basis commitment:

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

A001
NRC

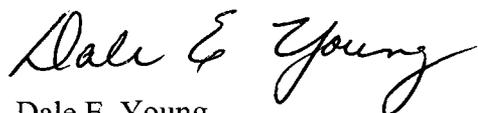
There shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO for ITS 3.6.6, Reactor Building Spray and Containment Cooling Systems, ITS 3.7.5, Emergency Feedwater (EFW) System, ITS 3.8.1, AC Sources – Operating, and ITS 3.8.9, Distribution Systems – Operating. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended. The administrative controls will ensure that Completion Time is NOT extended beyond the additive Completion Times of the two Required Actions for restoration of OPERABILITY unless a risk evaluation is performed. If unit operation within an LCO will exceed the maximum Completion Time, then either the shutdown Condition within the LCO should be entered OR a risk evaluation shall be performed and the risk impact managed under CP-253, “Power Operation Risk Assessment and Management.”

The attachment to this letter contains a list of all the regulatory commitments associated with LAR #295, Revision 0. The commitment above is included in this list.

The No Significant Hazards Considerations provided in the referenced document remains valid and is not changed by this submittal.

If you have any questions regarding this submittal, please contact Mr. Dennis Herrin, Acting Supervisor, Licensing and Regulatory Programs at (352) 563-4633.

Sincerely,



Dale E. Young
Vice President
Crystal River Nuclear Plant

DEY/dar

Attachment: 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.; 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.



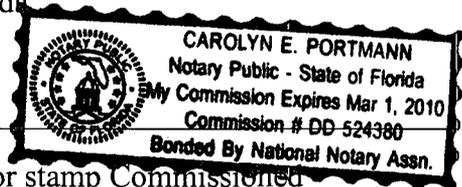
Dale E. Young
Vice President
Crystal River Nuclear Plant

The foregoing document was acknowledged before me this 25 day of February, 2008, by Dale E. Young.



Signature of Notary Public
State of Florida

(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

LICENSE AMENDMENT REQUEST #295, REVISION 0

**Extension of Allowed Outage Time to Seven Days
and Elimination of Second Completion Times**

ATTACHMENT

List of Regulatory Commitments

List of Regulator Commitments

The following table identifies the complete list of actions committed to by Florida Power Corporation (FPC) relevant to License Amendment Request #295, Revision 0, "Extension of Allowed Outage Time to Seven Days and Elimination of Second Completion Times Limiting Time." Any other actions discussed in the submittal represent intended or planned actions by FPC. 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
<p>CR-3 will perform procedure CP-253, "Power Operation Risk Assessment and Management," which requires both a deterministic and probabilistic evaluation of risk for the performance of all maintenance activities. This procedure uses the Level 1 PSA model to evaluate the impact of maintenance activities on core damage frequency. CR-3 will not plan any maintenance that results in "Higher Risk" (Orange Color Code) during an extended outage (greater than 72 hours) of the LPI, BS, DC or RW-DC System.</p>	<p>During extended (greater than 72 hours) outage on the LPI, BS, DC or RW-DC System</p>
<p>The Remote Shutdown Panel, the Appendix R Cooler and the opposite train of LPI, BS, DC, RW-DC, EFW, Auxiliary Feedwater System, Emergency Feedwater Initiation and Control System, HPI, and their power supplies (AC and DC) will be administratively designated as "protected" (i.e., no planned maintenance or discretionary equipment manipulation).</p>	<p>During extended (greater than 72 hours) outage on the LPI, BS, DC or RW-DC System</p>
<p>CR-3 will not initiate an extended preventive maintenance outage (greater than 72 hours) on the LPI, BS, DC or RW-DC System if adverse weather, as designated by Emergency Preparedness procedures, is anticipated.</p>	<p>During extended (greater than 72 hours) outage on the LPI, BS, DC or RW-DC System</p>
<p>When extended maintenance (greater than 72 hours) is performed (scheduled or emergent) on a train of the LPI or BS System, CR-3 will limit transient combustibles in, and establish a periodic fire watch in the decay heat pump vault of the opposite train, and the following rooms:</p> <ul style="list-style-type: none"> • Non-safety 4160V and 480V Switchgear Rooms • Opposite train ES 4160V and ES 480V Switchgear Rooms • Opposite train battery room • Opposite train charger room • Opposite train Inverters room • Remote Shutdown Panel Room • Relay/CRD Room and Adjoining Corridor • 'B' EFIC Room • Cable Spreading Room 	<p>During extended (greater than 72 hours) outage on the LPI or BS System</p>

<p>When extended maintenance (greater than 72 hours) is performed (scheduled or emergent) on a train of the DC or RW-DC System, CR-3 will limit transient combustibles in, and establish a periodic fire watch in the seawater room, and the following rooms:</p> <ul style="list-style-type: none"> • Non-safety 4160V and 480V Switchgear Rooms • Opposite train 4160V ES and 480V ES Switchgear Rooms • Opposite train battery room • Opposite train charger room • Opposite train Inverters room • Remote Shutdown Panel Room • Relay/CRD Room and Adjoining Corridor • 'B' EFIC Room • Cable Spreading Room 	<p>During extended (greater than 72 hours) outage on the DC or RW-DC System</p>
<p>When extended maintenance (greater than 72 hours) is performed (scheduled or emergent) on a train of the LPI, BS, DC or RW-DC System, CR-3 will limit transient combustibles and establish a periodic fire watch in the fire zones containing routed cables associated with the pressurizer PORV and PORV Block Valves. These rooms include:</p> <ul style="list-style-type: none"> • PORV/PORV Block Valve power supply breaker areas • Cable Spreading Room • Relay/CRD Room and Adjoining Corridor • Intermediate Building 119' elevation • Auxiliary Building 119' elevation • 'B' ES 4160V Switchgear Room • Remote Shutdown Room • 'A'/'B' Battery room 	<p>During extended (greater than 72 hours) outage on the LPI, BS, DC or RW-DC System</p>
<p>There shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO for ITS 3.6.6, Reactor Building Spray and Containment Cooling Systems, ITS 3.7.5, Emergency Feedwater (EFW) System, ITS 3.8.1, AC Sources – Operating, and ITS 3.8.9, Distribution Systems – Operating. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended. The administrative controls will ensure that Completion Time is NOT extended beyond the additive Completion Times of the two Required Actions for restoration of OPERABILITY unless a risk evaluation is performed. If unit operation within an LCO will exceed the maximum Completion Time, then either the shutdown Condition within the LCO should be entered OR a risk evaluation shall be performed and the risk impact managed under CP-253, "Power Operation Risk Assessment and Management."</p>	<p>This will be implemented in conjunction with the license amendment.</p>