



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

Ref.: 10 CFR 50.54(f)

May 8, 2008
3F0508-07

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Subject: Crystal River Unit 3 – Three Month Response to NRC Generic Letter 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems”

- References:
1. NRC Generic Letter 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,” dated January 11, 2008.
 2. Progress Energy to NRC letter – Request for Extension of 3-Month Response to Generic Letter 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems,” PE&RAS-08-025, dated April 08, 2008

Dear Sir:

Pursuant to 10 CFR 50.54(f), Florida Power Corporation (FPC), now doing business as Progress Energy Florida, Inc., hereby submits the Crystal River Unit 3 (CR-3) three month response to NRC Generic Letter 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems.” The Generic Letter (GL) requested that each licensee evaluate the licensing basis, design, testing, and corrective actions for the Emergency Core Cooling System (ECCS), Decay Heat Removal (DHR) System, and Containment Spray System, to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

The NRC, in GL 2008-01, requested each licensee to submit a written response in accordance with 10 CFR 50.54(f) within nine-months of the date of the GL to provide the following information:

- (a) A description of the results of evaluations that were performed pursuant to the requested actions of the GL. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems of the GL;
- (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,
- (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

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Additionally, the NRC requested that if a licensee cannot meet the requested response date, the licensee, "shall provide a response within three months of the date of this GL." In the three-month response, the licensee was requested to describe the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

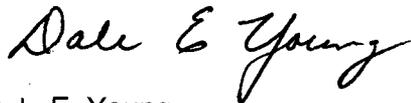
Florida Power Corporation, hereby notifies the NRC that CR-3 does not anticipate being able to fully complete the requested evaluations within the requested nine-month period. Enclosure 1 to this letter contains the three-month response to the Requested Information in NRC GL 2008-01 for CR-3.

By Reference 2, Progress Energy, Inc., documented NRC verbal approval of a due date extension to May 9, 2008, for submitting the requested three-month response to the Requested Information in GL 2008-01. The NRC verbal approval applied to the Progress Energy, Inc., nuclear fleet: the Brunswick Steam Electric Plant, Units 1 and 2; the Crystal River Nuclear Generating Plant, Unit 3; the Shearon Harris Nuclear Power Plant, Unit 1; and, the H. B. Robinson Steam Electric Plant, Unit 2.

Enclosure 2 contains a list of regulatory commitments contained in 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

Enclosure 1: Three-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"

Enclosure 2: List of Regulatory Commitments

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xc: Regional Administrator, Region II (w/enclosure)
CR-3 Resident Inspector (w/enclosure)
NRR Project Manager (w/enclosure)

STATE OF FLORIDA

COUNTY OF CITRUS

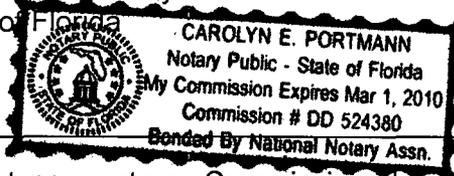
Dale E. Young states that he is the Vice President, Crystal River Nuclear Plant for Florida Power Corporation, doing business as Progress Energy Florida, Inc. (PEF); that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; 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
Vice President
Crystal River Nuclear Plant

The foregoing document was acknowledged before me this 8th day of May, 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

ENCLOSURE 1

**THREE-MONTH RESPONSE TO NRC GENERIC LETTER 2008-01, “MANAGING GAS
ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND
CONTAINMENT SPRAY SYSTEMS”**

THREE-MONTH RESPONSE TO NRC GENERIC LETTER 2008-01

As part of Generic Letter (GL) 2008-01, the NRC requested that each licensee evaluate its Emergency Core Cooling System (ECCS), Decay Heat Removal System, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified. The results of these evaluations are requested to be reported within nine months of the date of the GL pursuant to 10 CFR 50.54(f). The GL goes on to state that licensees who do not believe that they can complete the requested evaluations within the nine-month period shall provide the NRC, within three months of the date of the GL, proposed alternative actions, and provide sufficient justification for such alternatives.

Florida Power Corporation hereby notifies the NRC that Crystal River Unit 3 (CR-3) will not be able to fully complete the requested evaluations within the requested nine-month period and offers the following proposed alternative actions and supporting justifications of adequacy.

CR-3 expects to be able to complete the GL requested actions involving evaluation of licensing basis, design, testing, and corrective actions to a significant extent. However, the GL requested evaluations also necessitate detailed physical walkdowns of the subject piping systems to confirm pertinent design details (e.g., locations of high point vents), confirm as-built configurations (e.g., pipe elevations and slope) and ultrasonic examinations (UT) at locations potentially susceptible to gas accumulation. Portions of the subject piping systems are inaccessible during power operation due to one or more of the following reasons:

- The piping is in an area where dose rates are substantially higher during normal operation as compared to during plant shutdown conditions.
- The piping is in the containment building.
- Insulation removal is needed to fully characterize relevant geometry and insulation removal is not practical.
- Scaffolding is needed to access the piping to fully characterize relevant geometry and installation of scaffolding could jeopardize operability of adjacent equipment.

CR-3 does not currently have a planned refueling outage to conduct the walkdowns and perform UT examinations of inaccessible piping within the nine-month period requested by the GL (i.e., by October 11, 2008). The next refueling outage is currently planned for September 2009. The nine-month response to GL 2008-01 will include evaluations of non-accessible piping based on the existing plant as-built design drawings as well as system operating experience and any previously performed walkdown information.

A supplemental response to GL 2008-01 will be provided 90 days following completion of Refueling Outage R16. The supplemental response will describe any changes to the nine-month GL 2008-01 response resulting from walkdowns and ultrasonic examination of inaccessible piping.

CR-3 has confidence that the ECCS, Decay Heat Removal, and Containment Spray Systems can fulfill their required design functions, based upon the following:

- The majority of inaccessible piping is on the pump discharge where potential impact of gas accumulation is generally less than for pump suction piping.
- Based on reviews completed to date, no historical examples of events related to gas accumulation have been identified for the inaccessible piping.
- Successful performance of surveillance requirements (such as periodic venting and pump testing).

CR-3 will complete all the GL actions for these systems with the exception of the final verification walkdown of the pipe segments which requires a refueling outage to access. Preliminary evaluations of inaccessible piping will provide a high degree of confidence that these systems will perform their design functions. The outage walkdowns are expected to be validation activities of these design reviews.

Based upon the above, completing detailed walkdowns and ultrasonic examinations outside the requested nine-month period, but no later than startup from the next refueling outage, and submission of a supplemental response to the Generic Letter 90 days post-outage is an acceptable course of action.

This letter contains the following two new commitments:

1. Complete the detailed walkdowns and ultrasonic examinations of inaccessible piping at locations potentially susceptible to gas accumulation for systems within the scope of the GL prior to startup from the next refueling outage (currently scheduled to end December 19, 2009).
2. Submit a supplemental response to the NRC within 90 days following completion of Refueling Outage R16, which will describe any changes to the nine-month GL 2008-01 response resulting from walkdowns and ultrasonic examination of inaccessible piping.

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER – UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ENCLOSURE 2

LIST OF REGULATORY COMMITMENTS

THREE MONTH RESPONSE TO NRC GENERIC LETTER 2008-01, “MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS”

LIST OF REGULATORY COMMITMENTS

The following table lists regulatory commitments identified by Florida Power Corporation (FPC), in this document. 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.

Regulatory Commitments	Due Date
Complete the detailed walkdowns and ultrasonic examinations of inaccessible piping at locations potentially susceptible to gas accumulation for systems within the scope of the GL prior to startup from the next refueling outage.	Currently scheduled for 12/19/2009
Submit supplemental response to the NRC within 90 days following completion of Refueling Outage R16, which will describe any changes to the nine-month GL 2008-01 response resulting from walkdowns and ultrasonic examination of inaccessible piping.	90 days following completion of Refueling Outage R16