



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

Ref: 10 CFR 50.90

July 24, 2008
3F0708-05

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

Subject: Crystal River Unit 3 – Schedule for Submitting License Amendment Request (LAR) #304, Revision 0, Emergency Diesel Generator Voltage and Frequency Limits Revision

- References:
1. Crystal River Unit 3 to NRC Letter, 3F0707-08, dated July 31, 2007 “Crystal River Unit 3 – License Amendment Request #297, Revision 0, Emergency Diesel Generator Voltage and Frequency Limits Revision”
 2. Crystal River Unit 3 to NRC Letter, 3F0608-12, dated June 19, 2008, “Crystal River Unit 3 – Withdrawal of License Amendment Request #297, Revision 0”

Dear Sir:

This letter is being submitted by Florida Power Corporation (FPC), doing business as Progress Energy Florida, Inc., to: (1) explain the basis for withdrawing License Amendment Request (LAR) #297, Revision 0, Emergency Diesel Generator Voltage and Frequency Limits Revision; (2) identify the schedule for resubmitting the LAR; and, (3) provide assurance that the short term administrative controls, taken as corrective action in accordance with the guidance contained in NRC Administrative Letter 98-10, are effective and will remain in place until LAR implementation.

LAR #297 (Reference 1) was submitted to the NRC on July 31, 2007, requesting revision to Crystal River Unit 3 (CR-3) Improved Technical Specifications (ITS) Surveillance Requirements (SR) 3.8.1.2, SR 3.8.1.6, and SR 3.8.1.10 to restrict the voltage and frequency limits for both slow and fast Emergency Diesel Generator (EDG) starts. The steady state voltage limits were to be revised to plus or minus 2 percent of nominal voltage to accurately reflect the appropriate calculation and the way the plant is operated and tested. The steady state frequency limits were also becoming more restrictive (plus or minus 1 percent for fast EDG starts and plus or minus 1.5 percent for slow EDG starts) to assure compliance with plant design bases and the way the plant is operated, thus assuring the EDGs are capable of supplying power with the correct voltage and frequency to the required electrical loads. The frequency limit change is the result of an industry issue where the limits established in Regulatory Guide (RG) 1.9, Revision 2, “Selection, Design, and Qualification of Diesel-Generator Units Used as Standby (Onsite) Electric Power Systems at Nuclear Power Plants,” were determined to not have any plant specific calculation basis for all conditions and events. The RG guidance was the basis for the limits in the CR-3 ITS.

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

ADD
NRR

On April 17, 2008, CR-3 received three Requests for Additional Information (RAIs) related to LAR #297. Researching the reply to RAI #3 uncovered a potential new 10CFR50, Appendix R, concern associated with protection of the electrical control circuits for the EDG governor controllers. CR-3 was not able to resolve the newly identified technical concern and provide a subsequent response to the RAIs with sufficient time for the NRC to complete the review of LAR #297 and issue a License Amendment/Safety Evaluation Report within 12 months of LAR submittal. This was the basis for withdrawing LAR #297. To address the new, potential 10CFR50, Appendix R concern, mitigating actions that direct the Operator to restore the EDG frequency to an acceptable range have been established. These actions assure the EDG ratings and loading limits are not exceeded as a result of a fire event in the Control Room that requires shutdown from outside the Control Room. All operating crews have been informed of the issue and understand the mitigating actions necessary while the safe shutdown procedures are being revised.

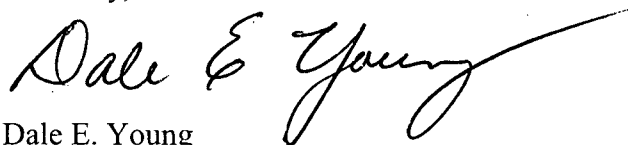
Following revision to both EDG frequency and loading calculations, CR-3 plans to resubmit a request to revise the EDG voltage and frequency limits under new LAR #304. The schedule for submitting LAR #304 is by November 7, 2008.

The basis for LAR #297 was discovery of a non-conservative technical specification at CR-3 as the result of the aforementioned industry issue. In accordance with the guidance contained in NRC Administrative letter 98-10, the EDG voltage and frequency limits continue to be administratively controlled. These administrative controls are based on approved calculations and are more restrictive than the values specified in the CR-3 ITS. Surveillance testing has demonstrated the ability of the EDGs to remain within the current administrative controls. An engineering evaluation has confirmed that these test results have maintained the EDG frequency within the administrative limits for over four years, with the exception of equipment failures. These administrative controls will remain in effect until LAR #304 implementation.

Regulatory commitments are listed in the attachment to this submittal.

If you have any questions regarding this submittal, please contact Mr. Daniel Westcott, Supervisor, Licensing and Regulatory Programs at (352) 563-4796.

Sincerely,



Dale E. Young
Vice President
Crystal River Nuclear Plant

DEY/par

Attachment: List of Regulatory Commitments

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

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT

**Schedule for Submitting LAR #304, Revision 0, Emergency Diesel
Generator Voltage and Frequency Limits Revision**

LIST OF REGULATORY COMMITMENTS

List of Regulatory Commitments

The following table identifies those actions committed to 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 or any associated regulatory commitments.

Commitment	Due Date
CR-3 plans to resubmit a request to revise the EDG voltage and frequency limits under new LAR #304. The schedule for submitting LAR #304 is by November 7, 2008.	November 7, 2008
The administratively controlled limits will remain in effect until LAR #304 implementation.	Complete Procedure SP-354A/B, Regulatory Commitment managed in the CR-3 Nuclear Operations Commitment System (NOCS) (Entry #100498)