



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

Ref: 10 CFR 50.55a

August 14, 2008
3F0808-03

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

Subject: Crystal River Unit 3 – Relief Request #07-001-SS, Revision 1, Alternate Examination Criteria for the Reactor Vessel Support Skirt to Perform Limited VT-3 Visual Examination on Three Areas 120 Degrees Apart on the Inside Surface In Accordance with 10 CFR 50.55a(a)(3)(ii), TAC No. MD7737

Reference:

1. Crystal River Unit 3 to NRC letter, 3F1207-04, dated December 21, 2007, “Crystal River Unit 3 – Inservice Inspection Program Plan, Ten Year Update,” Accession No. ML073650362
2. Crystal River Unit 3 to NRC letter, 3F0608-05, dated June 5, 2008, “Crystal River Unit 3 – Response to Request for Additional Information Regarding Relief Requests #07-001-SS, Revision 0, Alternate Examination Criteria for the Reactor Vessel Support Skirt to Perform Limited VT-3 Visual Examination on 3 areas 120 Degrees Apart on the Inside Surface in Accordance with 10 CFR 50.55a(a)(3)(i),” TAC No. MD7737

Dear Sir:

Pursuant to 10 CFR 50.55a, Florida Power Corporation (FPC) doing business as Progress Energy Florida, Inc., Crystal River Unit 3 (CR-3) is hereby submitting a revision to the Relief Request previously submitted as part of the Inservice Inspection Plan, Ten Year Update (Reference 1). The relief request incorrectly referenced subsection 10 CFR 50.55a(a)(3)(i) which applies to an alternative inspection that would provide an acceptable level of quality and safety. The basis provided justified an alternative inspection based on the difficulties of performing the Code required inspection and the significant dose that would be absorbed. As such, CR-3 is submitting a revision to correct this error by referencing the correct subsection, 10 CFR 50.55a(a)(3)(ii).

Additionally, CR-3 is clarifying the commitment provided in Reference 2 pertaining to the revision of the Inservice Inspection Plan. This clarification completely supersedes the previous commitment.

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

Sincerely,

Stephen J. Cahill
Engineering Manager

SJC/par

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

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NRR

Attachments: 1. Relief Request # 07-001-SS, Revision 1, Alternate Examination Criteria for the Reactor Vessel Support Skirt to Perform Limited VT-3 Visual Examination on Three Areas 120 Degrees Apart on the Inside Surface In Accordance with 10CFR50.55a(a)(3)(ii)

2. List of Regulatory Commitments

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

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50 - 302 / LICENSE NUMBER DPR - 72

ATTACHMENT 1

Relief Request #07-001-SS, Revision 1

Alternate Examination Criteria for the Reactor Vessel Support Skirt to Perform Limited VT-3 Visual Examination on Three Areas 120 Degrees Apart on the Inside Surface In Accordance with 10 CFR 50.55a(a)(3)(ii)

*ISI Program Plan
Crystal River Unit 3, Fourth Interval*

**10CFR50.55a Relief Request: 07-001-SS
Revision 1
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**Alternate Examination Criteria for the Reactor Vessel Support Skirt to Perform Limited
VT-3 Visual Examination on 3 Areas 120° Apart on the Inside Surface
In Accordance with 10CFR50.55a(a)(3)(ii)**

1.0 ASME CODE COMPONENTS AFFECTED:

Code Class:	1
Examination Category:	F-A
Item Number:	F1.40
Description:	Alternate Examination Criteria for the Reactor Vessel Support Skirt to Perform Limited VT-3 Visual Examination on 3 Areas 120° Apart on the Inside Surface, Examination ID B1.12.1
Component Name:	MK36 to 37

2.0 APPLICABLE CODE EDITION AND ADDENDA:

The Inservice Inspection Program is based on the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, 2001 Edition through the 2003 Addenda.

3.0 APPLICABLE CODE REQUIREMENTS:

ASME Section XI, Table IWF-2500-1, Examination Category F1.40, required a VT-3 Visual Examination of 100% of the component support.

4.0 REASON FOR REQUEST:

Pursuant to 10CFR50.55a (a)(3)(ii), relief is requested on the basis that the proposed alternative is required since performing the Code required examination will result in a considerable hardship. Crystal River Unit 3 feels that the alternate examination will continue to provide for an acceptable level of quality and safety.

Relief is requested based on the radiation conditions below the reactor vessel which would result in significant radiation exposure to inspection and support personnel. In order to perform a 100% visual examination, significant preparatory work including the installation of temporary lighting, erection of scaffolding, weld preparation, etc., would be necessary. These activities would be carried out around the full circumference of the reactor vessel support skirt interior. Based on previous exposure levels, it is estimated that personnel involved in this activity would be exposed to a total dose exceeding 16 Rem.

*ISI Program Plan
Crystal River Unit 3, Fourth Interval*

**10CFR50.55a Relief Request: 07-001-SS
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5.0 PROPOSED ALTRNATIVE AND BASIS FOR USE:

A VT-3 visual examination will be performed on 10% of the interior of the reactor vessel support at three positions along the circumference of the reactor vessel support. The same segments of the support skirt, located 120 degrees apart, that were examined during the First, Second, and Third Inspection Intervals, will be examined in the Fourth Inspection Interval.

Previous visual examinations performed during the First, Second and Third Inspection Intervals indicated that there was no degradation to the vessel support skirt. The locations selected are the least restrictive in providing access to the support skirt weld area without creating a potential for damage to the incore guide tubes. Examination performed at these locations will adequately reveal the condition of the reactor vessel support skirt without subjecting personnel to unnecessary radiation exposure.

6.0 DURATION OF PROPOSED ALTERNATIVE:

Relief is requested for the Fourth Ten-Year Inspection Interval for Crystal River Unit 3.

7.0 PRECEDENTS:

Crystal River Unit 3, Third Inspection Interval Relief Request 98-003-II was authorized per SER dated August 5, 1999. The Fourth Inspection Interval Relief Request utilizes an identical approach as was previously approved.

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50 - 302 / LICENSE NUMBER DPR - 72

ATTACHMENT 2

List of Regulatory Commitments

Alternate Examination Criteria for the Reactor Vessel Support Skirt to Perform Limited VT-3 Visual Examination on Three Areas 120 Degrees Apart on the Inside Surface In Accordance with 10 CFR 50.55a(a)(3)(ii)

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
CR-3 will revise the Inservice Inspection Plan to assure that the performance of a VT-3 examination of the reactor vessel support skirt weld, to the extent practical, will occur when maintenance or other activities remove the insulation covering the support skirt weld.	09/30/2008