



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

Refs. 10 CFR 2.390(a)(4)
10 CFR 50.55a

December 17, 2009
3F1209-02

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

Subject: Crystal River Unit 3 – Relief Request #08-002-RR, Revision 0, Completion of Regulatory Commitments (TAC NO. ME0023)

Reference: CR-3 to NRC letter, dated March 12, 2009, "Crystal River Unit 3 – Response to Request for Additional Information Regarding Relief Request #08-002-RR, Revision 0, Dissimilar Metal Weld Overlay Repair During the Fourth 10-Year Inservice Inspection Interval (TAC NO. ME0023)"

Dear Sir:

In the above referenced letter, Florida Power Corporation (FPC), doing business as Progress Energy Florida, Inc., (PEF), made two regulatory commitments related to submittal of an analysis of the residual stresses and flaw growth of repaired weldment, including crack growth calculations, related to the mitigation of the of the "A" Hot Leg surge pipe-to-surge nozzle Alloy 600/82/182 dissimilar metal butt weld. The preliminary analysis and evaluation were to be submitted to the NRC prior to entering Mode 4 during restart from Crystal River Unit 3 (CR-3) Refueling Outage 16 (R16). The final analysis and evaluation were to be submitted to the NRC 60 days after plant restart from R16. By submitting the final analysis and evaluation prior to entering Mode 4, both of the above regulatory commitments are considered complete.

Attachment 1 provides a list of the titles and a short description of the analysis and evaluation being submitted. Attachment 2 of this submittal is a CD-ROM containing the analysis and evaluation that complete two regulatory commitments made in the referenced letter.

The CD-ROM accompanying this submittal (Attachment 2) contains proprietary documents. AREVA NP Inc. requests the proprietary information in this CD-ROM be withheld from public disclosure in accordance with 10CFR2.390(a)(4). Two (2) affidavits supporting the request, one for each document, are provided in Attachment 3. This submittal contains no new regulatory commitments.

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

Sincerely,

Stephen J. Cahill
Manager Engineering

SJC/dwh

- Attachments:
1. Table of Referenced Documents
 2. CD-ROM Containing Referenced Documents (PROPRIETARY)
 3. Affidavits for Withholding Proprietary Information from Public Disclosure

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

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

A047
NRC

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

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Attachment 1

Table of Referenced Documents

Table of Referenced Documents

These documents are on the CD-ROM that is referenced as Attachment 2 of this submittal.

Analysis Number	Title	Summary
AREVA NP Inc. Document 32-9092285-001 (12/16/08)	Crystal River Unit 3 Hot Leg Surge Weld Overlay Repair Residual Stress Analysis	Documents the predicted weld residual stress finite element analysis of the hot leg surge nozzle after the application of the Structural Weld Overlay (SWOL)
AREVA NP Inc. Document 32-9092939-001 (12/16/08)	Crystal River Unit 3 Hot Leg Surge Weld Overlay Repair Crack Growth Evaluation	Evaluates the fatigue and primary water stress corrosion crack growth of postulated, inside surface connected, 360° circumferential and semi-elliptical axial flaws in the weld overlaid Hot Leg Surge Nozzle

NOTE: Both document revisions are the latest and applicable revision level. The analysis within each document was completed in 2008 and was based upon the Structural Weld Overlay (SWOL) design and implementation drawing. The actual SWOL was installed during the Crystal River Unit 3 (CR-3) Refueling Outage 16 (R16) in accordance with the same drawings. Therefore, the basis for the analysis remains valid.

The above documents will not be updated Post R16 SWOL because there is no need to do so.

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

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Attachment 2

**CD-ROM Containing Referenced Documents
(PROPRIETARY)**

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

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Attachment 3

**Affidavits for Withholding Proprietary Information from Public
Disclosure**

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA NP to determine whether information should be classified as proprietary:

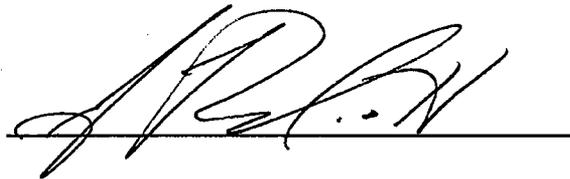
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

The information in the Document is considered proprietary for the reasons set forth in paragraphs 6(b) and 6(c) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document have been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to be "J.R.N.", written over a horizontal line.

SUBSCRIBED before me this 4th
day of December, 2009.

A handwritten signature in black ink, reading "Danita R. Kidd", written over a horizontal line.

Danita R. Kidd
NOTARY PUBLIC, STATE OF VIRGINIA
MY COMMISSION EXPIRES: 12/31/12
Reg. # 205569



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- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
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- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
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Danita R. Kidd
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