



PO Box 1551  
411 Fayetteville Street Mall  
Raleigh NC 27602

**Attachment 1 to this letter contains  
SECURITY-RELATED  
INFORMATION -WITHHOLD  
UNDER 10 CFR 2.390.  
Upon removal of Attachment 1  
this letter is uncontrolled.**

10 CFR 73.5

Serial: RA-10-019  
September 8, 2010

United States Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
Washington, DC 20555-0001

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT  
DOCKET NO. 50-302 / LICENSE NO. DPR-72

## **REQUEST FOR EXEMPTIONS FROM PHYSICAL SECURITY REQUIREMENTS**

### REFERENCES:

1. Progress Energy letter from R. J. Duncan II to the Nuclear Regulatory Commission Document Control Desk titled, *Request for Exemptions from Physical Security Requirements,* dated November 30, 2009
2. Progress Energy letter from R. J. Duncan II to the Nuclear Regulatory Commission Document Control Desk titled, *Supplement to Exemption Request from Physical Security Requirements,* dated January 15, 2010
3. Nuclear Regulatory Commission letter from Farideh E. Saba to Jon A. Franke titled, *Crystal River Unit 3 Nuclear Generating Plant – Exemption From the Requirements of 10 CFR Part 73, Section 73.55 (TAC No. ME2794),* dated March 25, 2010

Ladies and Gentlemen:

In accordance with the requirements of 10 CFR 73.5, Florida Power Corporation (FPC), now doing business as Progress Energy Florida, Inc., requests the Nuclear Regulatory Commission (NRC) approve exemptions from specific requirements of 10 CFR Part 73, "Physical Protection of Plants and Materials." The exemptions requested would extend the compliance due date for the Crystal River Unit 3 Nuclear Generating Plant for certain measures required by the revised rule.

The NRC issued a Final Rule for revised security requirements in the Federal Register dated March 27, 2009. Pursuant to the Final Rule, the revised security requirements had to be implemented by March 31, 2010. FPC achieved compliance with a vast majority of the revised rule by the March 31, 2010, compliance date. In Reference 1, as supplemented by Reference 2, FPC requested exemptions for additional time to comply with four specific provisions of the revised rule. These exemptions were approved by the NRC via Reference 3.

FPC has determined that additional time, beyond that previously approved by the NRC in Reference 3, will be required to achieve compliance with four provisions of the Final Rule. The schedules used in Reference 1 were based on the conceptual design information available at the time of the submittal and regrettably were not fully informed regarding the complexity

**Attachment 1 to this letter contains  
SECURITY-RELATED INFORMATION -WITHHOLD UNDER 10 CFR 2.390.  
Upon removal of Attachment 1 this letter is uncontrolled.**

S001A  
NRC

and scope of the tasks to be performed. The designs are now almost fully developed and the discovery phase is essentially complete. As a result, more accurate schedules have now been developed. The additional time is needed due to the unforeseen need for design changes necessary to achieve full compliance with the Final Rule; the time necessary for the revised design and construction; and the complexity of the revised design and associated analysis. Additional time, beyond that approved in Reference 3, is therefore requested to complete the necessary security modifications. Additional details regarding the specific provisions of the rule for which exemptions are requested, and the length of the exemptions are provided in Attachment 1.

This letter contains the following attachments:

- Attachment 1: Exemption Request for Crystal River Unit 3 (Contains Security-Related Information – Withhold Under 10 CFR 2.390)
- Attachment 2: Redacted Version of Exemption Request for Crystal River Unit 3

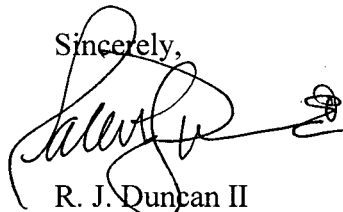
As noted above, Attachment 1 contains security-related information associated with the physical protection of the Crystal River Unit 3 Nuclear Generating Plant, as described in 10 CFR 2.390(d)(1). Accordingly, FPC requests that the information contained in Attachment 1 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390.

This letter contains no regulatory commitments.

If you should have any questions regarding this submittal, please contact Ed O'Neil, Director – Nuclear Protective Services, at (919) 546-2151.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 8, 2010.

Sincerely,



R. J. Duncan II  
Vice President, Nuclear Operations  
Progress Energy, Inc.

RJD/dbm

Attachments:

1. Exemption Request for Crystal River Unit 3 (Contains Security-Related Information – Withhold Under 10 CFR 2.390)
2. Redacted Version of Exemption Request for Crystal River Unit 3

**Attachment 1 to this letter contains  
SECURITY-RELATED INFORMATION -WITHHOLD UNDER 10 CFR 2.390.  
Upon removal of Attachment 1 this letter is uncontrolled.**

c: J. Wiggins, USNRC Director – Office of Nuclear Security and Incident Response  
L. Reyes, USNRC Regional Administrator – Region II  
USNRC Resident Inspector – CR-3  
F. Saba, NRR Project Manager – CR-3  
J. Paige, NRR Project Manager – CR-3

**Attachment 1 to this letter contains  
SECURITY-RELATED INFORMATION -WITHHOLD UNDER 10 CFR 2.390.  
Upon removal of Attachment 1 this letter is uncontrolled.**

**Attachment 2**  
**Redacted Version of**  
**Exemption Request for Crystal River Unit 3**

**Crystal River Unit 3**

**Docket No. 50-302 / License No. DPR-72**

**Request for Exemption from Specific Provisions in 10 CFR 73.55**

A. Background

The Nuclear Regulatory Commission (NRC) issued a Final Rule for revised security requirements in the Federal Register dated March 27, 2009. Pursuant to 10 CFR 73.55(a)(1) of the Final Rule, the revised security requirements in 10 CFR 73.55 were to be implemented by March 31, 2010. Florida Power Corporation (FPC), now doing business as Progress Energy Florida, Inc., completed an extensive evaluation of these new requirements. This evaluation included a new comprehensive blast analysis for each of Progress Energy's four nuclear sites. The comprehensive blast analysis included consideration of equipment necessary to maintain the four required alarm station functions, consideration of explosives as allowed by the Design Basis Threat (DBT), and the research of construction records to determine exact wall construction. Additionally, as resolutions to identified vulnerabilities were evaluated, FPC's internal adversary team was consulted to assure that thorough resolutions were selected.

As a result of this extensive evaluation, FPC determined that the Crystal River Unit 3 (CR-3) site would be in compliance with the vast majority of the requirements in the Final Rule within the brief implementation period. Significant efforts were and are being expended to comply with the revised rule requirements in the Final Rule. These efforts include: implementation of the new safety/security interface requirements, revising and implementing the Training and Qualification Plan in accordance with the new requirements, revising and implementing the new increased drill and exercise requirements, and resolving the major logistical challenges involved with the increased number of drills and exercises involving the adversary team and Multiple Integrated Laser Engagement System (MILES) gear. To address some of the logistical challenges, Progress Energy centrally controls the MILES gear and has voluntarily adopted the Department of Energy standards for issuance of the MILES gear for drills and exercises.

However, FPC previously determined that implementation of four specific parts of the revised requirements would require additional time since they involve significant physical upgrades to the CR-3 security system. These changes are significant physical modifications that will benefit the CR-3 defensive strategy beyond the minimum requirements necessary to meet the new security requirements. {

(d)(1)

}

Upon review of the Final Rule, FPC identified four projects necessary to achieve compliance with the Final Rule. These projects were:

{

(d)(1)

Items 1, 2, and 3, involve significant modifications which, once completed, will provide a robust defensive posture beyond that which would be achieved through only relocating the existing IDS equipment. Item 4 was intended to ensure that a margin of safety is maintained during single act scenarios.

{

(d)(1)

Compliance with the above listed rule provisions was the subject of the November 30, 2009, exemption request (Ref. 1) which was approved by the NRC on March 25, 2010 (Ref. 3). FPC has determined that additional time, beyond that previously approved by the NRC in Reference 3, will be required to achieve compliance with the provisions. {

(d)(1)

} the time necessary for the CAS2 building's design and construction; and the complexity of the building design and associated analysis. As discussed below, compliance with the four provisions are tied to the completion of the new CAS2 building.

(d)(1)

See Table 1 below for project milestone schedules.

B. Proposed Exemptions

FPC requests exemptions, from the implementation date only, for the four items listed below. FPC will maintain the current CR-3 site protective strategy in accordance with the current Physical Security Plan. The current CR-3 site protective strategy has been approved by the NRC staff as providing a high assurance for the protection of the facility and public from the effects of radiological sabotage. Accordingly, the requested exemptions to defer compliance with provisions of 10 CFR 73.55 until December 15, 2011, and March 15, 2012, *"will not endanger life or property or the common defense and security, and are otherwise in the public interest."*

Item 1

[Redacted content]

(d)(1)

Item 2



(d)(1)

Item 3



(d)(1)



[Redacted content]

(d)(1)

Item 4

[Redacted content]

(d)(1)

[Redacted content]

(d)(1)

C. Basis for Exemptions

FPC is seeking exemptions from the previously approved November 15, 2010, and December 15, 2010, compliance dates to December 15, 2011, and March 15, 2012, for provisions listed in 10 CFR 73.55 as discussed in Section B. CR-3 management has approved the plan to perform the modifications necessary to achieve full compliance. This plan has been aggressively pursued, with significant effort expended in order to meet the 2010 dates previously discussed; however, a number of issues have significantly hampered the ability to move forward with the plan as described in Reference 1. These issues will be discussed in detail below as they apply to each impacted compliance project.

There are several issues which have delayed the work to this point, and/or impacted the projected schedule, such as equipment and engineering vendor responsiveness, extensive excavation interferences, the operational challenges projected for tie-in during power operations, and implementation of the concurrent modification process (described immediately below). While these issues have resulted in delays and project schedule additions, the most significant impact to the schedule is the complexity of the design as it has evolved from the conceptual state to a point where discovery is now considered essentially complete {

(d)(1)

} This complexity was revealed during the design process, which determined that the conceptual plan as previously presented was not technically adequate to achieve compliance, and furthermore did not adequately account for the intricacies of maintaining the existing plant security systems in service {

(d)(1)

} The details on how the

current plan for the physical modifications necessary to achieve compliance differs from that previously presented, and a description of the realized and projected schedule impacts are provided below for each of the four projects.

Concurrent Modification Process

In an effort to accelerate the schedule, physical work was commenced, at risk to the extent practicable, even though the required modification packages were not complete. This was done under the proceduralized “concurrent modification” process that allows for limited implementation activities to move forward without a fully approved design package. This process requires Engineering Manager concurrence, and stipulates strict requirements and controls on the implementation activities. While this process has allowed implementation activities to move forward ahead of the design approval, it is a tentative process. As the design advances and changes, there has been a necessity to stop work in the field on several occasions to limit the extent of rework. In some cases, there has been rework as changes in the design promulgated following field implementation. This is particularly a concern with regards to procurement of long lead critical items or implementation activities that would be hard to recover from if the design strategy changed (e.g. foundation work). This has also necessitated the demobilization and mobilization of craft, which is itself inefficient and time consuming. Although the concurrent modification process is inefficient and carries financial risk, it has allowed FPC to move forward with implementation activities and accelerate schedule completion.

Project Overview

[Redacted content]

(d)(1)

{ (d)(1)

A schedule for these projects is summarized in Table 1 which shows critical milestones.

{ (d)(1)

{ (d)(1)

} These modifications warrant a thorough review of the safety-security interface and had to be coordinated with the steam generator replacement outage. To ensure that they do not pose operational challenges, they must be coordinated with the Independent Spent Fuel Storage Installation (ISFSI) project, and the plant itself as containment repairs continue and the plant returns to power operation. All of these efforts require careful design, planning, procurement, and implementation efforts to ensure operational and personnel safety.

The steam generator replacement outage was the largest outage in CR-3's history and involved a much greater scope of work and number of workers than a normal refueling outage. Over 4000 supplemental workers were onsite supporting the refueling outage. In addition to the steam generators, other large components were replaced during this extended outage (e.g., moisture separator reheaters, large heat exchangers) requiring the movement of extremely heavy loads within the PA. Also, containment delamination was discovered at the construction opening during the steam generator replacement outage. This has resulted in an extended outage to facilitate repairs to the containment.

Due to CR-3's small footprint, there were extensive logistical challenges for the movement of personnel and materials into and out of the protected area during the height of the outage. It was important, during the high activity period, to maintain personnel focus on outage activities to assure a safe and secure outage; therefore, FPC had to carefully schedule physical work on the security upgrades around the high activity period of the refueling outage. Although the outage continues, as FPC works to repair the containment structure, every effort was made to commence the physical work inside the protected area for Part 73 compliance as soon as it was safe and logistically feasible to do so.

Extensive design work has been completed to this point. Although the majority of the designs are not 100 percent complete, they have progressed to the point where major discovery can be considered essentially complete. In the cases where there are still major

design issues being resolved (e.g. CAS2 blast design calculation), there is confidence that a robust contingency plan exists to ensure implementation of the required modifications for compliance by the dates requested herein. FPC has been working very closely with the engineering vendor preparing the detailed design packages for these projects, and has called upon industry experts for third party reviews for certain aspects to ensure a quality design meeting all regulations.

{ (d)(1)

Item 1

{ (d)(1)

{

(d)(1)

} This part of the project requires extensive design and planning, installation of duct banks, and controlled tie-in and acceptance testing.

The small CR-3 site footprint eliminated the option to simply increase the height of the internal nuisance fence and re-designate it as the new PA boundary, or simply relocate the existing microwave system from inside the PA barrier to outside the PA barrier. FPC has chosen to upgrade the IDS to a more robust Perifeld system and place it within the isolation zone. Based on industry operating experience, FPC believes that the detection capabilities of the new system are superior (e.g., fewer false and nuisance alarms) to the existing system with a higher probability of detection.

{

}

(d)(1)

{

(d)(1)

} FPC chose this vendor in February of 2010. Once the vendor was selected, the engineering vendor worked with the equipment/software vendor to incorporate this complicated design. Although more robust than the existing system, this new system requires extensive conduit runs to connect the various edge and branch switches to the head-end equipment. This required several iterations to ensure that the switches could be physically connected as the vendor requested. In addition, decisions on items such as supervision and loss of signal alarms were iterative due to the changing industry understanding of what was required to comply with regulations. The Factory Acceptance Test, originally scheduled for mid-June is now scheduled for mid-October 2010.

{

}

(d)(1)

CR-3 sits on top of an engineered, safety-related "berm" that was built to protect the plant from flooding. The "berm" is protected from erosion by concrete wave steps. Design and

construction is further complicated due to the “berm” and concrete “wave steps.” Special consideration must be taken during the design and construction phases to assure that the excavation and trenching does not degrade the “berm” and “wave steps” reducing their effectiveness in flood protection and erosion control. Similarly, mounting camera or fence poles on the “wave steps” must also be given special consideration during the design and construction phases.

The fence work and IDS post installation have been progressing, but at a slower pace than expected due to the quantity of unidentified underground interferences encountered. Any process which disturbs the safety-related berm must employ specific operational and design considerations and proceed deliberately in the field to prevent any impact to plant operation or the ongoing containment repair activities. Excavation on the site is a slow process which involves hydro-lasing or air lancing the compacted friable limestone and then vacuuming away the loose fill to prevent the inadvertent severance of underground power, communications, and piping systems that could present a safety hazard to those performing the excavation or disrupt plant operations or security systems. Although schedule allowance was made for encountering unknown underground items, the number of items actually encountered was vastly underestimated, resulting in schedule delays as each item is dispositioned prior to proceeding. As an example, a single fence post hole excavated as a part of Item 1 compliance may have numerous unidentified interferences, each of which require a separate engineering review prior to authorization to proceed.

New power and data cables must be routed to each IDS zone and new cameras. Routing of the new power and data cables will require the installation of new duct banks which involve excavation and trenching within the PA. Excavation and trenching within the PA were originally scheduled to begin following the steam generator replacement outage due to logistical reasons (e.g., personnel and material movement). Although the outage is not complete, due to the ongoing repair of the containment wall, excavation and trenching has been started. Such work requires close coordination with Operations, Security, and the containment repair team to ensure no impact on plant operations, security, or the critical containment repair activity.

Duct bank installation and cable routing have progressed slower than anticipated. As previously stated, excavation and trenching in the PA is a slow, highly manual process which involves exploratory excavation followed by vacuuming away the loose dirt. Although allowance was made for encountering unknown underground items during implementation of the duct banks and cable routing, the number of items actually encountered was underestimated, resulting in schedule delays similar to the fence and IDS post installations.

Excavation and trenching are further complicated due to the heavy haul path on the safety-related berm and wave steps. Excavation and trenching must be performed in a very controlled manner in and around the PA, and must be coordinated closely with Operations/Security so as not to disrupt normal plant operations. Several additional months

are necessary to complete the excavation and trenching, erect the necessary fencing, install the necessary duct banks, and route the necessary cabling to support the new IDS and camera relocations/additions.

Once the necessary cables are routed to the new or relocated equipment, tie-in of this equipment can begin. Tie-in of the equipment must be carefully planned and performed in a way that minimizes disruptions to the operating security systems. Final tie-in and acceptance testing of the IDS cannot be completed until the new {

(d)(1)

} IDS and camera integrated acceptance testing will require approximately three months once power is available from the UPS. Compliance with Items 1 and 2 will be achieved at the completion of the integrated acceptance testing.

In summary, final acceptance testing of the IDS and compliance with Item 1 cannot be completed until the PA cameras are properly positioned and tied into the new security computer and video systems and {  
}

(d)(1)

Item 2

{

}

(d)(1)

Item 3

{

}

(d)(1)



{

}

(d)(1)

The design package schedule extended repeatedly as the design evolved and uncovered the additional detail required for compliance and a safe transition. {

(d)(1)

}

{

}

(d)(1)

[Redacted]

The UPS design is approximately 70 percent complete and the UPS and batteries have been ordered. Duct bank construction is in progress and on track to be completed prior to the completion of the new CAS2 building.

[Redacted]

Item 4

[Redacted]

[Redacted content]

(d)(1)

In order to recover schedule time from the design process, a prefabricated two story modular blast resistant metal building was selected. Originally selected to minimize the impact to the plant and reduce construction time, this has proven to have had the most adverse impact on the schedule of all the issues. Although the off-site building fabrication has progressed, delivery has been delayed due to the design issues encountered, particularly with the analytical blast analysis and structural analysis effort. The blast analysis and structural analysis for the two story building were more complex than originally anticipated and required significantly more time to complete than expected. This analytical effort has gone through several unsuccessful iterations to assess the new and existing structures against the DBT and new { }

(d)(1)

During the week of August 9, 2010, a team of Progress Energy personnel met with building vendor and engineering vendor personnel to resolve the issues with the analysis. This meeting achieved a path forward for successfully completing the analysis and moving forward with interior equipment designs and foundation construction. Therefore, FPC is moving forward with the { } at CR-3. Work on the foundation, that had previously been halted while design issues were resolved, is resuming to support installation of the prefabricated building. The foundation work is approximately 70 percent complete.

[Redacted content]

(d)(1)

The contract for the prefabricated two story modular blast resistant metal building required the building vendor to provide design drawings, calculations, and blast certificates that met the required codes and standards. After review of the vendor's calculation and blast certification, additional blast and structural analyses were required to verify the performance of the structures. The design products required several rounds of comments and resolution between the engineering firm preparing the required change documents and the building vendor's engineers. The number of iterations was unforeseen and caused downstream delays for the design of equipment to be housed in the building.

FPC expected the building vendor to have an engineering capability that would support the practices common to nuclear utility design efforts; but, the building vendor was not prepared for the level of review and oversight that was required and provided for nuclear projects by FPC. The engineering vendor responsible to design the equipment to be located in the building was tasked to prepare the designs within the footprint of the building. The effort was complicated because the building shell design was outside of the engineering vendor's scope. The iterative process created by vendors working together was much more significant and lengthy than expected due to the complexity of the designs resulting in further delays.

The building module walls have been fabricated at the vendor's facility. A Progress Energy team inspected the vendor's fabrication facility on July 22, 2010, and found several items that were not built to requirements which had to be corrected. Additionally, the blast door required redesign to ensure personnel safety and usability as the original doors were not suitable for the amount of ingress/egress expected. The modules, when finished, will be shipped to the site, rigged into place, bolted together to form a complete building and welded to the embedment plates on the foundation. When the building is in place, work will commence to install the systems, cables and equipment inside the building.

{ } (d)(1)

Compliance with Item 4 will be achieved at that time.

Summary

As indicated above, FPC has and is expending a great deal of effort in the design, planning, and construction phases of these projects to ensure a sound safety-security interface.

{ } (d)(1)

- Operating experience from the implementation of previous security orders has shown that decisions made within a compressed schedule to meet an aggressive deadline may meet the intent of the regulation, but since there is not adequate time to thoroughly research and evaluate all available options and considerations, they often create unintended consequences that have long-term adverse impacts on the site. Additional time for design and implementation will help to avoid adverse consequences associated with these projects.
- The sequencing of many activities within a compressed time frame has presented a number of challenges. Many activities have to be completed in series with each other while other activities can be accomplished in parallel. Additional time will provide for better planning and execution of the plan to better assure personnel safety and a sound safety-security interface throughout the construction portion of the project.

These modifications will provide several long term security benefits for CR-3:

{

}

(d)(1)

FPC believes that the additional time necessary to complete this project is warranted based on the strengthened security posture that will be achieved through the implementation of these projects.

FPC believes that the significant scope of the modifications and the time necessary to safely construct and test the modifications justify additional time beyond the previously approved compliance dates. Therefore, FPC believes that our actions are in the best interest of protecting public health and safety through the security changes that will be instituted.

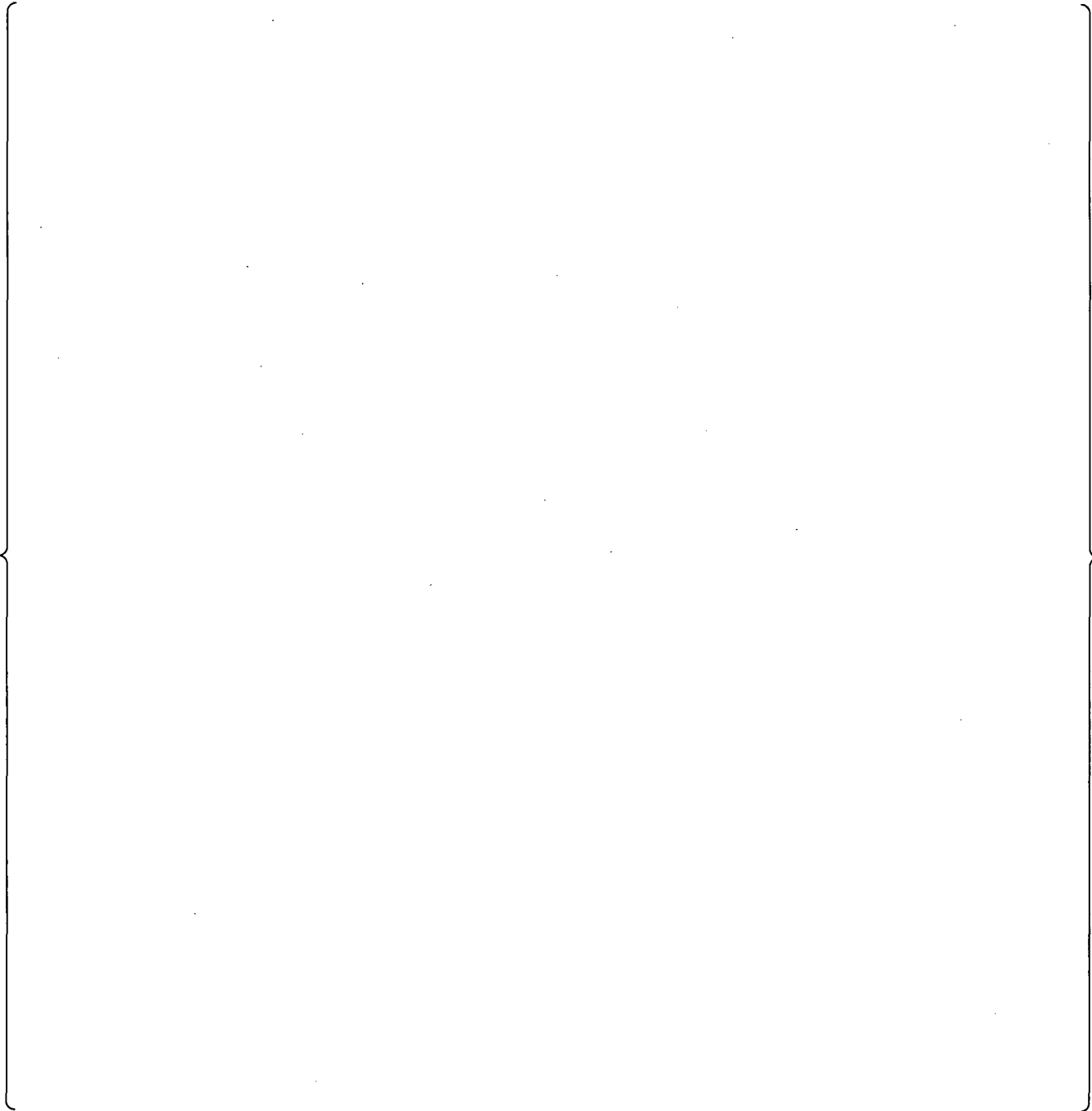
#### D. Temporary Compliance Measures Considered in Lieu of a Second Exemption

FPC considered numerous options for achieving temporary compliance with the four provisions of the Final Rule by the previously approved compliance dates before pursuing a second round of exemptions. Options considered for each of the four items are discussed below. However, for the reasons provided below, these temporary compliance measures were rejected.

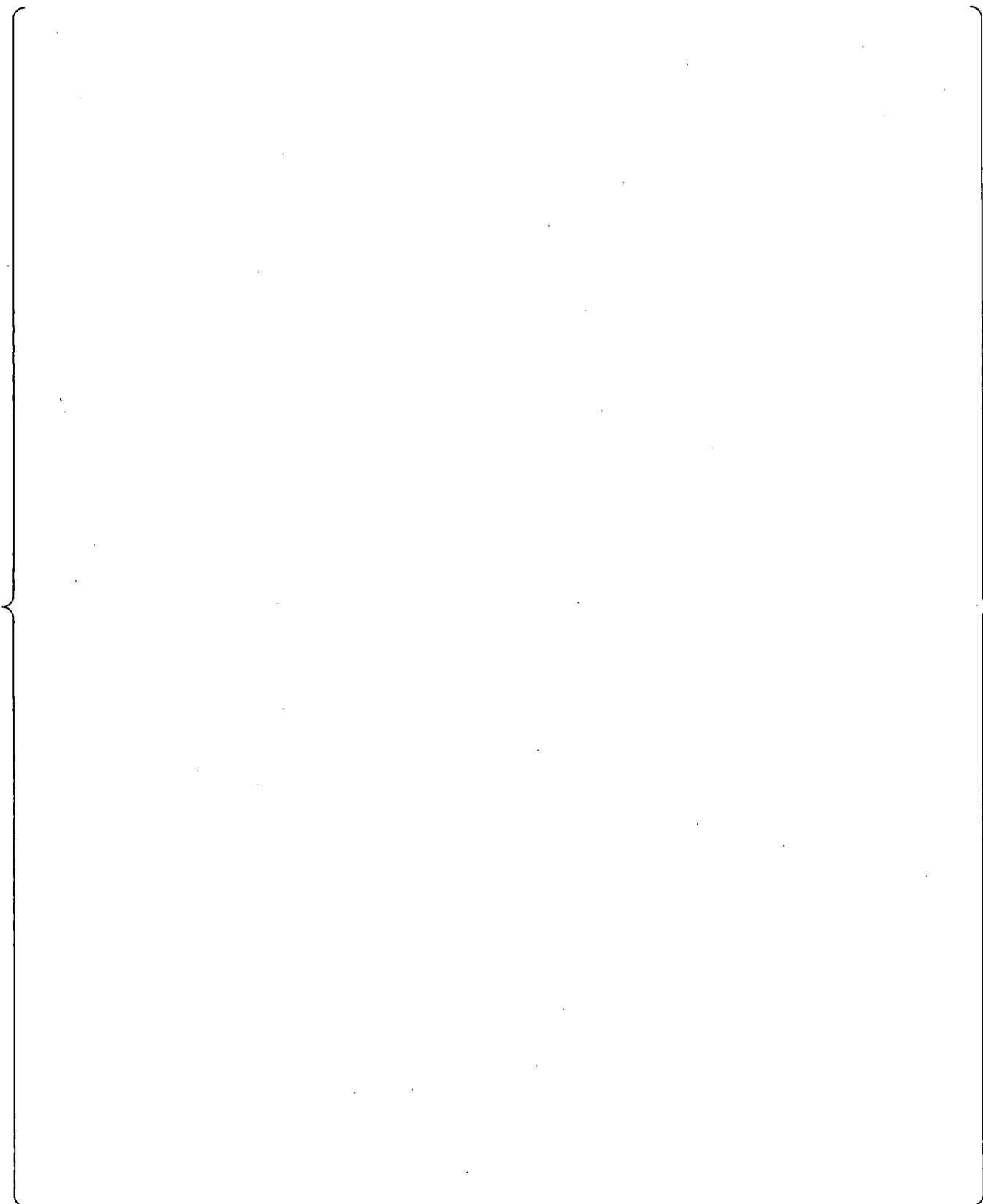
Item 1

The existing security strategy focuses on detection of activity in the Owner Controlled Area (OCA) prior to reaching the outer barriers and providing maximum delay in reaching the PA.

Temporary compliance options considered for compliance with 10 CFR 73.55(e)(7)(i)(B) included:



(d)(1)



(d)(1)



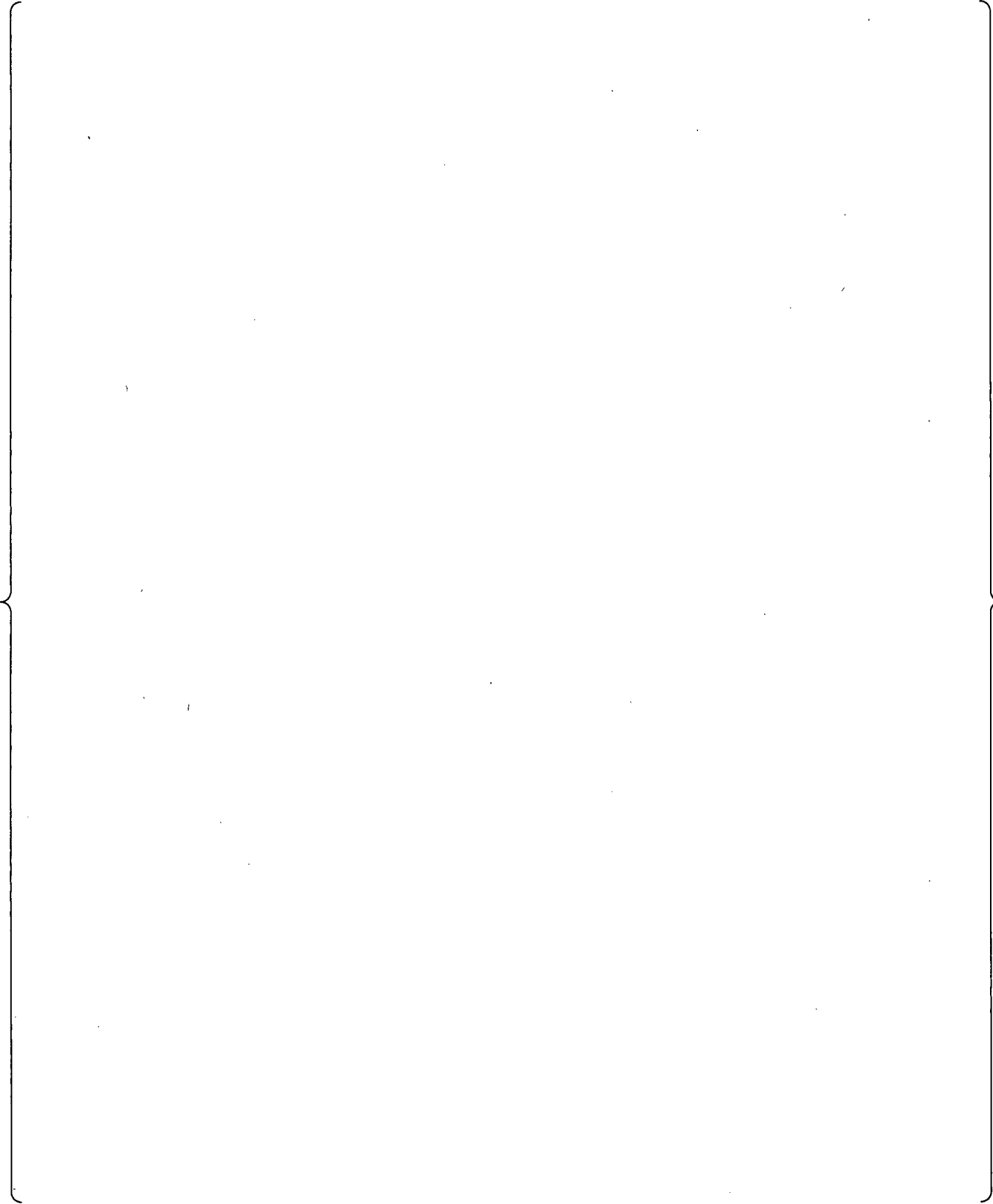
(d)(1)

Item 2



(d)(1)





(d)(1)

{ (d)(1)

Item 3

{ (d)(1)



(d)(1)

Item 4



(d)(1)

(d)(1)

[Redacted content]

(d)(1)

E. Environmental Assessment

Florida Power Corporation (FPC), now doing business as Progress Energy Florida, Inc., is requesting an exemption for Crystal River Unit 3, (CR-3), in accordance with 10 CFR 73.5, "Specific exemptions." The requested exemption would further defer the compliance date from March 31, 2010, as specified in 10 CFR 73.55(a)(1), to December 15, 2011, and March 15, 2012, for specific provisions of 10 CFR 73.55. The proposed action is needed to allow additional time for the design and installation of security modifications that are expected to provide long term benefits in security posture and capabilities. In lieu of full compliance with the four provisions of 10 CFR 73.55, as revised on March 27, 2009, FPC will maintain the current CR-3 site protective strategy in accordance with the current Physical Security Plan. The current CR-3, site protective strategy has been approved by the NRC staff as providing a high assurance for the protection of the facility and public from the effects of radiological sabotage.

Deferral of compliance from March 31, 2010, to December 15, 2011, and March 15, 2012, for specific provisions of 10 CFR 73.55 is a compliance date change only and, therefore,

does not result in any physical changes to structures, systems, and components (SSCs) or land use at CR-3. Therefore, the deferral of the compliance date does not involve:

- any change to the types, characteristics, or quantities of non-radiological effluents discharged to the environment.
- any changes to liquid radioactive effluents discharged to the environment.
- any changes to gaseous radioactive effluents discharged to the environment.
- any change in the type or quantity of solid radioactive waste generated.
- any change in occupational dose under normal or Design Basis Accident (DBA) conditions.
- any change in the public dose under normal or DBA accident conditions.
- any land disturbance.

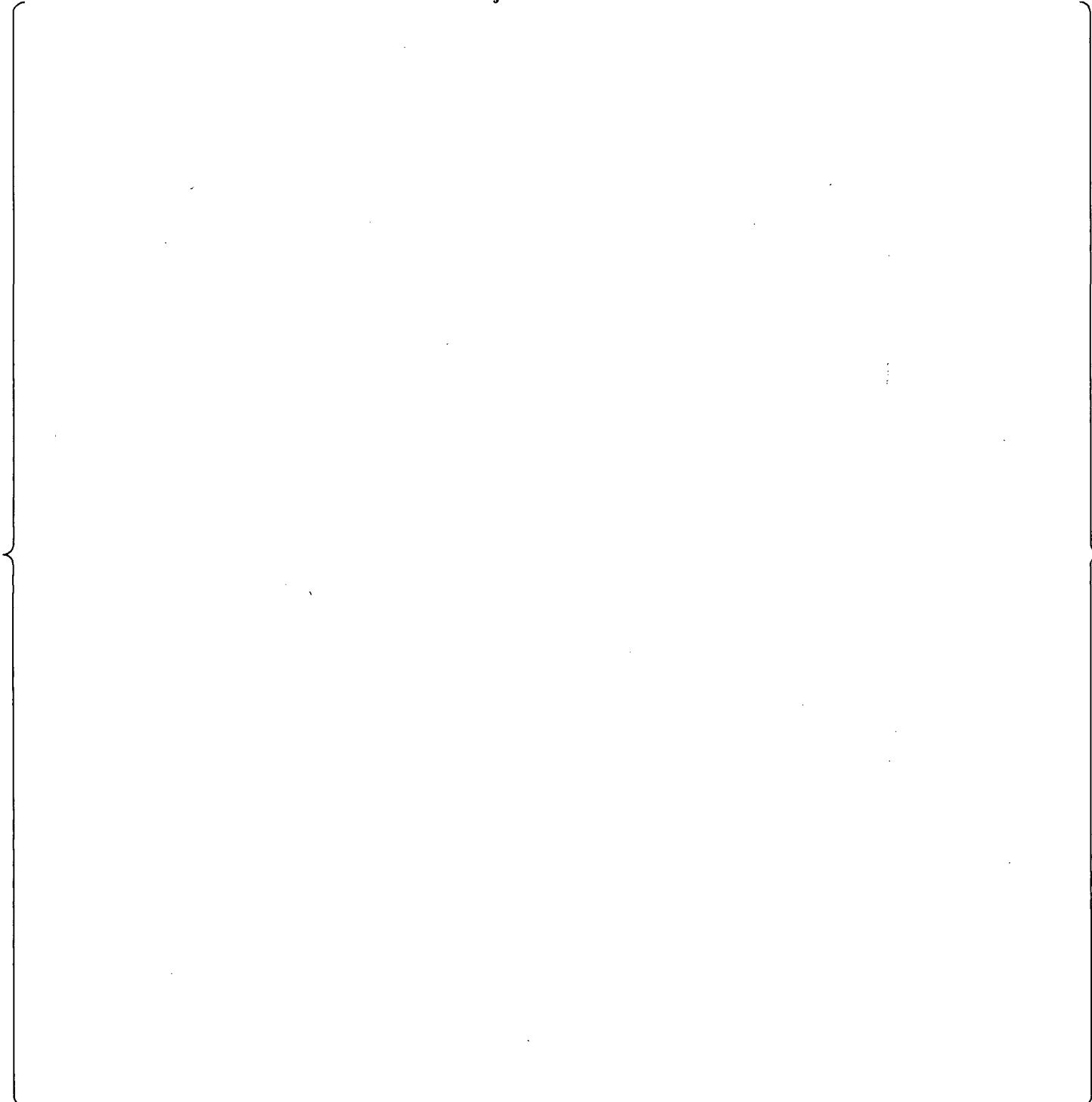
#### Conclusion

There is no significant radiological environmental impact associated with the proposed exemption. The proposed exemption will not affect any historical sites nor will it affect non-radiological plant effluents.

#### F. References:

1. Progress Energy letter from R. J. Duncan II to the Nuclear Regulatory Commission Document Control Desk titled, *Request for Exemptions from Physical Security Requirements,*” dated November 30, 2009
2. Progress Energy letter from R. J. Duncan II to the Nuclear Regulatory Commission Document Control Desk titled, *Supplement to Exemption Request from Physical Security Requirements,* dated January 15, 2010
3. Nuclear Regulatory Commission letter from Farideh E. Saba to Jon A. Franke titled, *Crystal River Unit 3 Nuclear Generating Plant – Exemption From the Requirements of 10 CFR Part 73, Section 73.55 (TAC No. ME2794),* dated March 25, 2010

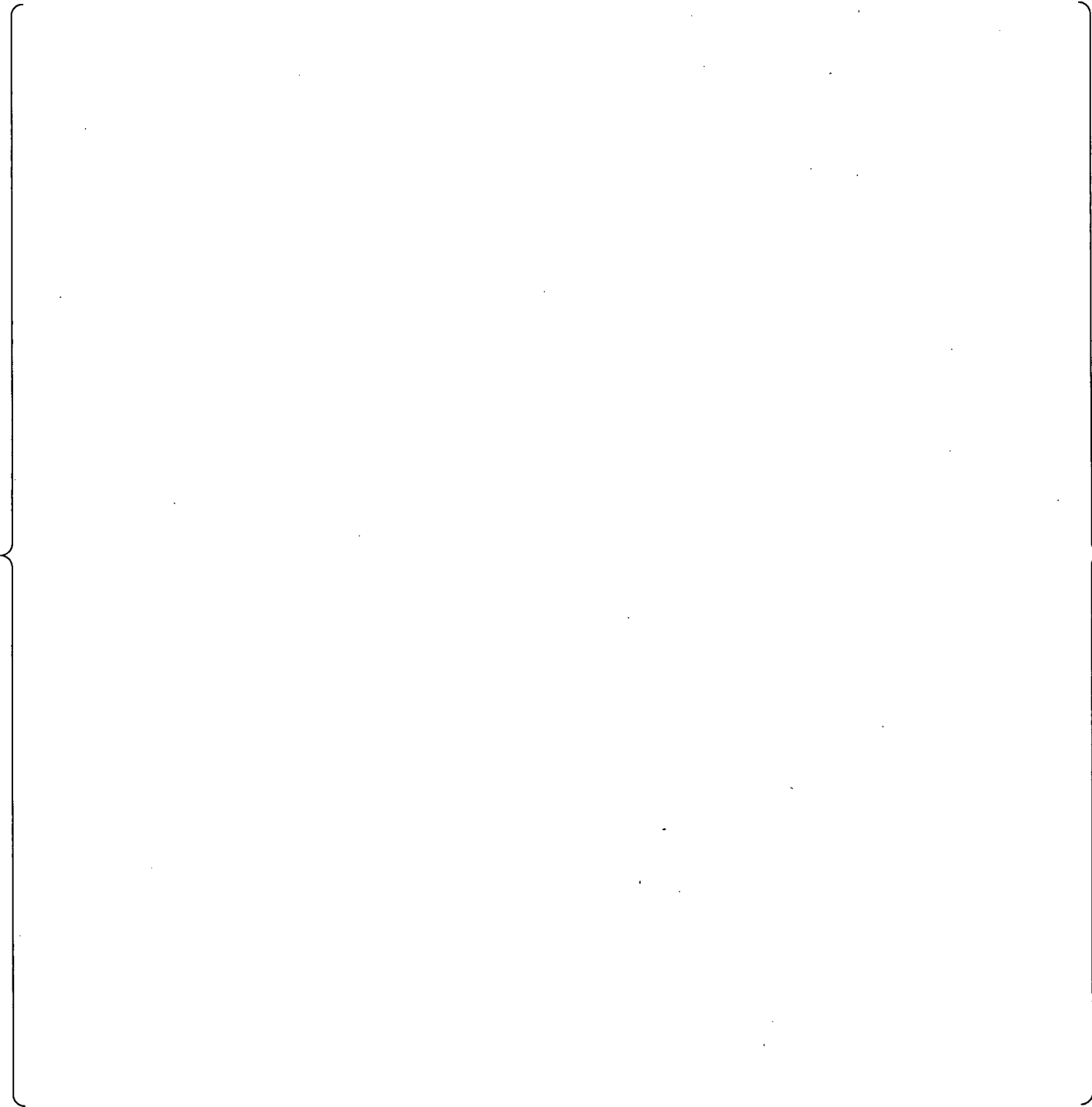
**Table 1: Project Schedule Milestones\***

A large, empty rectangular area enclosed by a thin black border, representing the content of Table 1. A large right-facing curly bracket is positioned to the right of this area, spanning its entire vertical extent.

(d)(1)

\* The dates and sequences provided in this milestone schedule are best estimates based on information available at the time the schedule was developed and may change as designs are finalized and construction proceeds. Therefore, these dates and sequences are not considered to be regulatory commitments.

**Figure 1: Crystal River Unit 3 Protected Area**



(d)(1)



**Figure 2: {**

(d)(1)

(d)(1)

**Figure 3: Crystal River Site Plot Plan**

