



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

Ref: 10 CFR 26

September 23, 2010
3F0910-06

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

Subject: Crystal River Unit 3 – Response to Request for Additional Information Regarding Part 26 Exemption Request

- References:
- (1) CR-3 to NRC letter, 3F0710-03, dated July 13, 2010, "Request for One-Time Exemption from the Requirements of 10 CFR 26.205(d)(3)"
 - (2) CR-3 to NRC letter, 3F0810-10, dated August 26, 2010, "Response to Request for Additional Information Regarding Part 26 Exemption Request"
 - (3) NRC to CR-3 email dated September 15, 2010, "Crystal River Part 26 Request for Additional Information (ME4268)"

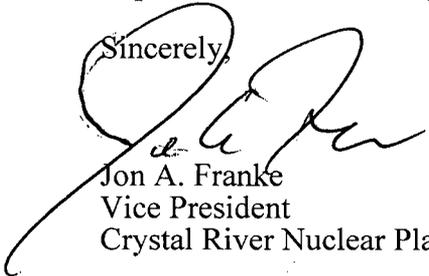
Dear Sir:

On July 13, 2010, Florida Power Corporation (FPC), doing business as Progress Energy Florida, Inc., requested a one-time exemption from portions of 10 CFR 26.205(d)(3) for Crystal River Unit 3 (CR-3). Subsequently, the Nuclear Regulatory Commission (NRC), by emails dated August 11, 2010 and September 15, 2010, forwarded requests for additional information (RAIs) concerning the exemption request. The attachment to this letter provides a response to the September 15, 2010 RAI.

No new regulatory commitments are contained in this submittal.

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

Sincerely,



Jon A. Franke
Vice President
Crystal River Nuclear Plant

JAF/crm

Attachment: Response to Request for Additional Information

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

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

ADD1
NRR

PROGRESS ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 /LICENSE NUMBER DPR-72

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

ATTACHMENT

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

On July 13, 2010, Florida Power Corporation (FPC), doing business as Progress Energy Florida, Inc., requested a one-time exemption from portions of 10 CFR 26.205(d)(3) for Crystal River Unit 3 (CR-3). Subsequently, the Nuclear Regulatory Commission (NRC), by emails dated August 11, 2010 and September 15, 2010, forwarded requests for additional information (RAIs) concerning the exemption request. Below is the NRC RAI dated September 15, 2010, followed by the CR-3 response.

The Nuclear Regulatory Commission (NRC) performed a preliminary review of the exemption request. The licensee's responses to the following RAI will allow the NRC staff to complete its review in a timely manner.

1. The exemption request indicates that certain individuals will be supporting other Progress Energy outages prior to participating in the Crystal River outage. With respect to Part 26 work hour controls, describe the manner in which these individuals will be transitioned onto the Crystal River outage from the various other outages, and how the transition process will ensure that these individuals will not be fatigued.

CR-3 Response

Progress Energy is committed to ensuring that employees supporting other outages are not fatigued when they return to support the CR-3 restart. In the initial exemption request, dated July 13, 2010, a commitment was made that, "CR-3 will ensure covered personnel, including those temporarily assigned to outages at other units, do not work greater than an average of 54 hours per week for a minimum of eight weeks preceding implementation of the exemption." Progress Energy implements the work hour restrictions of Part 26 through procedure ADM-NGGC-0206, "Managing Fatigue and Working Hour Limits," which requires that:

If an outage worker begins work for PGN within 9 days of performing outage work at another nuclear plant, the worker must:

- a. Have had a 34 hour break within the 9 days that precede the day on which the worker begins work for PGN.*
- b. Not have exceeded or will not exceed the MWH¹ rules.*

This is consistent with the controls in Regulatory Guide 5.73, "Fatigue Management for Nuclear Power Plant Personnel," Regulatory Position 10.

¹ MWH—Maximum Work Hours, as outlined in 10 CFR 26.205(d)(1)