



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

Ref: 10 CFR 170.11

November 5, 2010
3F1110-04

U.S. Nuclear Regulatory Commission
ATTN: Chief Financial Officer
Washington, D.C. 20555-0001

Subject: Request to be Considered a Pilot Plant for DI&C-ISG-06, Digital Instrumentation and Controls Task Working Group #6: Licensing Process Interim Staff Guidance

Dear Commissioners and Staff:

The NRC and the Nuclear Energy Institute (NEI) have developed interim staff guidance (ISG) on the licensing of digital instrumentation and control (I&C) safety systems for operating nuclear plants contained in DI&C-ISG-06, "Digital Instrumentation and Controls Task Working Group #6: Licensing Process Interim Staff Guidance." DI&C-ISG-06 provides the licensing process to be used by the NRC in the review of digital I&C systems and provides guidance to licensees on the content of the associated License Amendment Request (LAR).

Florida Power Corporation (FPC), doing business as Progress Energy Florida, Inc. (PEF), intends to submit an LAR in support of the addition of a digital system referred to as the Inadequate Core Cooling Monitoring System (ICCMS) at Crystal River 3 (CR-3). The new system precludes the need to continue to rely on manual operator actions to mitigate certain design basis accidents. An automatic action necessary to support a future Extended Power Uprate will also be added to the ICCMS.

FPC currently intends to submit the ICCMS LAR by September 30, 2011. However, as part of the Lessons Learned from the current industry pilot, FPC anticipates submitting a Topical Report on Diversity and Defense in Depth (D3) in February 2011.

FPC requests NRC consideration of CR-3 as a pilot plant for the use of DI&C-ISG-06. In support of further development and improvements of DI&C-ISG-06, FPC will continue to work with the NRC and NEI in developing this LAR consistent with the guidance provided in DI&C-ISG-06. FPC's participation as an additional pilot plant will significantly broaden the insights gained from applying the ISG because it is a much simpler application that is governed by the same process. Also, in accordance with 10 CFR 170.11(b), FPC requests a waiver of fees associated with the NRC review of the D3 Topical Report and LAR for ICCMS. The NRC review of the LAR, which will be developed based on the guidance provided in DI&C-ISG-06, will support future improvements to DI&C-ISG-06 based on a pilot plant application.

This correspondence 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,



Jon A. Franke
Vice President
Crystal River Nuclear Plant

JAF/krw

cc: U.S. Nuclear Regulatory Commission, Document Control Desk
Luis A. Reyes, Regional Administrator, Region II
Thomas K. Morrissey, Senior Resident Inspector - CR-3
William Kemper, Chief, Instrumentation and Controls Branch
Siva P. Lingam, Project Manager, Office of Nuclear Reactor Regulation
Gordon A. Cleifton, Senior Project Manager, Nuclear Energy Institute