



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257**

September 24, 2012

MEMORANDUM TO: Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

FROM: Victor M. McCree */RA By Leonard Wert For/*
Regional Administrator

SUBJECT: REQUEST FOR TEMPORARY EXCEPTION TO THE RESIDENT
INSPECTOR STAFFING POLICY FOR CRYSTAL RIVER
NUCLEAR PLANT

Inspection Manual Chapter (IMC) 2515, Light-Water Reactor Inspection Program - Operations Phase, Section 11.06, requires regional offices to obtain approval from the Director, Office of Nuclear Reactor Regulation for proposed exceptions to the resident inspector staffing policy. The staffing policy identifies the assignment of two resident inspectors at single unit sites. The purpose of this memorandum is to request a temporary exception to this policy for the Crystal River facility to permit staffing the site with a single resident inspector.

Crystal River Unit 3 has been in an extended shutdown since September 2009 when the unit was shutdown for steam generator replacement. Completion of outage activities and restart of the plant were delayed due to the occurrence of internal cracking in one containment bay wall. Initial repairs were completed in 2010 but additional cracking in two other bays occurred during retensioning of the containment building tendons. The Crystal River Unit 3 reactor has been in a defueled condition since May 28, 2011. The future of Crystal River Unit 3 is currently undecided while the licensee determines the course of action for containment repairs.

The current senior resident inspector at Crystal River has been reassigned as the senior resident inspector at the St. Lucie Nuclear Plant effective December 16, 2012. Region II does not plan on backfilling this position until the licensee has finalized plans for Crystal River. Once the licensee determines a course of action for the unit, the staffing at the site will be reevaluated to ensure appropriate support for planned inspection activities. If the licensee decides to repair the containment, then Region II intends to assign an additional inspector with construction experience to compliment the resident inspector through the repair period. This inspector may be qualified in accordance with IMC 1252, "Construction Inspector Training and Qualification Program," rather than IMC 1245, "Qualification Program for Operating Reactor Programs." The intent is that the two inspectors will be able to accomplish both the ROP baseline inspection and specific containment repair inspection activities.

CONTACT: Daniel Rich, RII/DRP/B3
(404) 997-4721

Region II will formally reassess resident inspector staffing at Crystal River prior to December 16, 2013, and either conform to the staffing policy described in IMC 2515 or propose an appropriate alternative.

Region II plans to adhere to the resident inspector coverage requirements stated in IMC 2515 to the maximum extent possible. However, with only a single resident inspector assigned, ensuring that site coverage is not interrupted for more than three consecutive days would entail undue commitment of regional inspection resources without a corresponding safety benefit. Therefore, Region II proposes that site coverage will not be interrupted for more than five consecutive working days while site staffing is reduced. Similarly the deep-backshift requirements stated in IMC 2515 will be reduced by half.


To implement the Reactor Oversight Process at Crystal River Unit 3, Region II prepared an inspection plan which implemented IMC 0351, "Implementation of the Reactor Oversight Process at Reactor Facilities in an Extended Shutdown Condition for Reasons Other Than Significant Performance Problems." The inspection plan addressed accomplishment of the Reactor Oversight Process baseline inspection procedures and included observations of the planned structural repairs to the containment building. The inspection plan also described the status of performance indicators and inspections planned to address invalid performance indicators. Region II believes that this reduced inspection scope can be accomplished by one resident inspector with support by region based inspectors. If required for emergency response, inspectors from other sites (e.g., Farley and St. Lucie) could be dispatched to Crystal River.

In summary, assigning and relocating another resident inspector to Crystal River would not be prudent at this time due to the uncertainty in the licensee's plans. Staffing the Crystal River resident inspector office with one resident inspector provides Region II with the inspection resources needed for the current conditions at the site while allowing flexibility to assign additional inspectors as necessary. Your review regarding this request for a temporary exception to the resident inspector staffing policy for Crystal River is appreciated.

☒ Approved


Eric J. Leeds, Director

Office of Nuclear Reactor Regulation


Date

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X Approved

/RA By B. Broger For/
Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Date 9/26/2012

X PUBLICLY AVAILABLE

☐ NON-PUBLICLY AVAILABLE

☐ SENSITIVE

X NON-SENSITIVE

ADAMS: X Yes ACCESSION NUMBER: _____

☐ SUNSI REVIEW COMPLETE ☐ FORM 665 ATTACHED

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