



Crystal River Nuclear Plant  
15760 W. Power Line Street  
Crystal River, FL 34428

Docket 50-302  
Operating License No. DPR-72

10 CFR 50.90

February 26, 2014  
3F0214-07

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 Changes to the Administrative Controls Section of the Technical Specifications

- References:
1. Crystal River Unit 3 to NRC letter, "License Amendment Request #313, Revision 0, Revision to Improved Technical Specifications Administrative Controls for Permanently Defueled Conditions," dated April 25, 2013 (ADAMS Accession No. ML13128A286)
  2. NRC to CR-3 Electronic Mail, "Request for Additional Information Regarding Changes to the Administrative Controls Section of the Technical Specifications," dated February 12, 2014

Dear Sir:

In Reference 1 Duke Energy Florida, Inc. (DEF), requested changes to the Administrative Controls Section of the Crystal River Unit 3 (CR-3) Technical Specifications (TS). The request included a change to Section 5.8, "High Radiation Area."

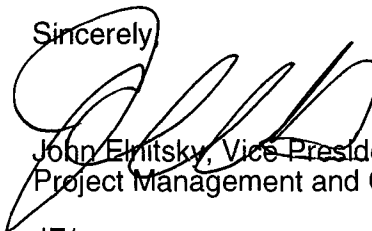
In Reference 2, the Nuclear Regulatory Commission (NRC) requested additional information on the controls for high radiation areas contained in Section 5.8 in regards to the implementation of 10 CFR 20.1602, "Control of access to very high radiation areas."

Attachment 1 to this letter contains the NRC request for additional information and the CR-3 response. Attachment 2 contains a new regulatory commitment to provide a change to TS Section 5.8 in a future submittal.

If you have any questions regarding this submittal, please contact Mr. Dan Westcott, Manager, Nuclear Regulatory Affairs, at (352) 563-4796.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 26, 2014.

Sincerely



John Ehritsky, Vice President  
Project Management and Construction

JE/scp

- Attachments:
1. Response to Request for Additional Information
  2. Regulatory Commitment

xc: NRR Project Manager  
Regional Administrator, Region I  
State Contact

A001  
NRR

**DUKE ENERGY FLORIDA, INC.**

**CRYSTAL RIVER UNIT 3**

**DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
REGARDING CHANGES TO THE ADMINISTRATIVE  
CONTROLS SECTION OF THE TECHNICAL SPECIFICATIONS**

**ATTACHMENT 1**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

## **RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

### **NRC Request for Additional Information**

Title 10 of the Code of Federal Regulations (10 CFR), Section 20.1601, requires licensees to control access to High Radiation Areas (HRA, or areas > 100 millirem (mrem)/hour (hr)). This regulation is fairly prescriptive but does allow licensees (per 10 CFR 20.1601(c)) to request alternate controls. All power reactor licensees have adopted alternate controls that relieve the requirement to lock HRAs, unless they have dose rates > 1000 mrem/hr. In other words, these licensees do not need to lock HRAs from 100 mrem/hr to 1000 mrem/hr if they implement the compensatory requirements of the TSs.

In the 1990 revision to 10 CFR 20, the NRC defined a Very High Radiation Area (VHRA) as an area with dose rates > 500 rad/hr and added 10 CFR 20.1602 to require more stringent controls in addition to those required by 10 CFR 20.1601. The NRC subsequently revised the Standard Technical Specifications to clarify that the alternate controls approved in the TS did not apply to VHRAs.

Sections 5.8.2 and 5.8.3 of the proposed CR3 TS state that the alternate controls specified in each apply to "areas with radiation levels > 1000 mrem/hr at 30 cm." A plain reading of these would include areas greater than 500 rad/hr (e.g., a Very High Radiation Area), which is not consistent with Part 20.

Please clarify how the proposed wording meets the requirements of 10 CFR 20.1602, or propose wording that complies with the requirements of 10 CFR 20.1602.

### **Crystal River Unit 3 Response to Request for Additional Information**

In a telephone conversation between the NRC Project Manager for CR-3 and the CR-3 Manager, Nuclear Regulatory Affairs on February 20, 2014, agreement was reached on a method to change TS 5.8.2 and 5.8.3 which would address the NRC concern that the CR-3 ITS, Sections 5.8.2 and 5.8.3, are not consistent with 10 CFR Part 20. CR-3 converted to the Improved Technical Specifications (ITS) in 1993, based on Revision 0 to the ITS NUREG for Babcock and Wilcox reactors (NUREG 1430). Revision 0 did not include the revision to Part 20 as part of these sections, but later revisions of the ITS NUREG did incorporate this change. A subsequent revision to Section 5.8.2 did not recognize the need to revise these sections as the result of the regulation change.

During the telephone conversation, it was further agreed that the NRC would complete its review and approval of License Amendment Request (LAR) #313, Revision 1, as it is currently proposed, as the affected wording was not identified as being within the scope of changes in the LAR. The wording to be added to these sections will be similar to the existing wording in the corresponding section of the Improved Technical Specification (NUREG 1430, Revision 4). In Attachment 2, CR-3 is providing a regulatory commitment to submit the agreed upon change to TS 5.8.2 and 5.8.3 in a revision to LAR #316, Revision 0, "Revise and Remove License Conditions and Revision to Improved Technical Specifications to Establish Permanently Defueled Technical Specifications," (ADAMS Accession No. ML13316C083) by August 15, 2014.

**DUKE ENERGY FLORIDA, INC.**

**CRYSTAL RIVER UNIT 3**

**DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
REGARDING CHANGES TO THE ADMINISTRATIVE  
CONTROLS SECTION OF THE TECHNICAL SPECIFICATIONS**

**ATTACHMENT 2**

**REGULATORY COMMITMENT**

**REGULATORY COMMITMENT**

The following table identifies those actions committed to by Duke Energy Florida, Inc. in this document. Other statements in this correspondence are provided for information purposes and are not considered to be regulatory commitments. Please notify the Crystal River Unit 3 (CR-3) Manager, Nuclear Regulatory Affairs of any questions regarding this document or any associated regulatory commitments.

<b>Regulatory Commitment</b>	<b>Due Date/Event</b>
CR-3 will submit a revision to License Amendment Request #316, Revision 0, "Revise and Remove License Conditions and Revision to Improved Technical Specifications to Establish Permanently Defueled Technical Specifications," to revise Technical Specifications 5.8.2 and 5.8.3 proposing wording that complies with the requirements of 10 CFR 20.1602.	August 15, 2014