DUKE ENERGY®

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

May 7, 2014
3F0514-01

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

Subject: Crystal River Unit 3 – Response to Requests for Additional Information and Supplement 1 to License Amendment Request #316, Revision 0

References:
1. CR-3 to NRC letter dated October 29, 2013, "Crystal River Unit 3 – License Amendment Request #316, Revision 0, Revise and Remove License Conditions and Revision to Improved Technical Specifications to Establish Permanently Defueled Technical Specifications" (ADAMS Accession No. ML13316C083)
2. CR-3 to NRC letter dated February 26, 2014, "Crystal River Unit 3 – Response to Request for Additional Information Regarding Changes to the Administrative Controls Section of the Technical Specifications" (ADAMS Accession No. ML14064A343)
3. NRC to CR-3 Electronic Mail dated April 10, 2014, "MF3089 Defueled TS Request for Additional Information"

Dear Sir:

Pursuant to 10 CFR 50.90, Duke Energy Florida, Inc. (DEF) hereby provides the Response to Requests for Additional Information (RAIs) regarding License Amendment Request (LAR) #316, Revision 0. In Reference 1, Crystal River Unit 3 (CR-3) proposed changes to the Facility Operating License (FOL) and the Improved Technical Specifications. This correspondence is Supplement 1 to LAR #316 providing replacement pages for the FOL and Permanently Defueled Technical Specifications.

In Reference 2, CR-3 responded to an RAI and provided a commitment to propose additional changes to Technical Specification Administrative Controls 5.8.2 and 5.8.3 that would comply with requirements of 10 CFR 20.1602 regarding very high radiation areas. This correspondence provides replacement pages for those sections to satisfy the commitment.

In Reference 3. the NRC provided RAIs regarding the FOL License Conditions for Cyber Security and Mitigating Strategies which CR-3 proposed to eliminate in LAR #316, Revision 0. With this correspondence, CR-3 is withdrawing the request to alter either of those License Conditions and is providing replacement pages reinstating them as originally imposed.

Two editorial changes are also made in the FOL. A spelling correction is being made in License Condition 2.C.(14)(2) where the word 'damage' is currently misspelled. An addition is being made to the list of 'Attachments' on the signature page of the FOL to add 'Appendix B' that was inadvertently removed when Amendment 2 to the FOL was issued.

The conclusions of the LAR #316 No Significant Hazards Consideration and the Environmental Impact Evaluation contained in Reference 1 are not affected by, and remain applicable to, this Supplement.

There are no new regulatory commitments made within this submittal.

A001
NRR

The CR-3 Plant Nuclear Safety Committee has reviewed this request and recommended it for approval.

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 May 7, 2014.

Sincerely,

John Elnitsky, Vice President
Project Management and Construction

JE/scp

Attachments:
A. Response to Requests for Additional Information
B. Supplement to LAR #316 Revision 0
C. Proposed Facility Operating License Page Changes, Strikeout and Shadowed Text Format
D. Proposed Facility Operating License Page Changes, Revision Bar Format
E. Proposed Technical Specification Page Changes, Strikeout and Shadowed Text Format
F. Proposed Technical Specification Page Changes, Revision Bar Format

xc: NRR Project Manager
Regional Administrator, Region I

DUKE ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

LICENSE AMENDMENT REQUEST #316, REVISION 0

ATTACHMENT A

RESPONSE TO REQUESTS FOR ADDITIONAL INFORMATION

RESPONSE TO REQUESTS FOR ADDITIONAL INFORMATION

RAI 1 – Cyber Security License Condition 2.D

Duke Energy Florida, Inc. (DEF) in its license amendment request, dated October 29, 2013, indicates that "the Cyber Security Plan license condition is no longer required." However, Title 10 of the *Code of Federal Regulations* (10 CFR) Section 73.54, "Protection of digital computer and communication systems and networks," which became effective on March 27, 2009, is applicable to reactors that were licensed to operate on that date, including Crystal River, Unit 3. It does not specify a point at which a licensee must no longer maintain its cyber security program.

1. Has CR3 identified those digital computer and communication systems and networks associated with safety-related and important to safety functions, security functions and emergency preparedness functions, and support systems and equipment which must be protected against cyber attacks under the existing cyber security plan?

2. Does CR3 have no such digital computer and communication systems and networks?

RAI 1 Response

1. Yes, CR-3 has identified digital assets which must be protected against cyber attacks. In accordance with the requirements to be completed on or before December 31, 2012, Crystal River Unit 3 assembled and qualified a Cyber Security Assessment Team which identified critical systems and critical digital assets in accordance with the applicable guidelines for Safety, Security, and Emergency Preparedness functions. As of 2014, CR-3 is in the process of the 2-year re-assessment of all systems as well as performing vulnerability assessments and planning mitigation strategies.

2. CR-3 has digital computer and communication systems and networks that must be protected.

CR-3 is withdrawing the request to eliminate the second paragraph of License Condition 2.D. Replacement pages for the Facility Operating License are included in Attachment D reinstating it as originally imposed.

RAI 2 – Mitigating Strategy License Condition 2.C(14)

Basis for Requested Additional Information

The licensee is requesting to remove License Condition 2.C.(14) "Mitigation Strategy License Condition" from the license. This License Condition requires the licensee to develop and maintain strategies for addressing large fires and explosions. As stated in the amendment request, in accordance with 10 CFR 50.54 (hh)(3), the requirements in 10 CFR 50.54(hh)(2) will not apply after both certifications have been filed under 10 CFR 50.82.

The Commission added 10 CFR 50.54(hh)(3) in the Power Reactor Security Requirements final rule in response to a comment that the requirements of 10 CFR 50.54(hh) should not apply to "reactor facilities currently in decommissioning and for which the certifications required under 10 CFR 50.82(a)(1) have been submitted" because "it is inappropriate that 10 CFR 50.54(hh) should apply to a permanently shut-down and defueled reactor where the fuel was *removed from the site or moved to an [ISFSI].*" 74 Fed. Reg. 13933 (Mar. 27, 2009) (emphasis

added). The NRC stated in the Statement of Considerations for the final rule that it "agree[d] with this comment and revised the final requirements in 10 CFR 50.54(hh) so they do not apply to facilities for which certifications have been filed under 10 CFR 50.82(a)(1) or 10 CFR 52.110(a)(1)."Id. The NRC staff position expressed in this Statement of Considerations does not express a conclusion that continued storage of fuel in the spent fuel pool of a reactor facility without the mitigating strategies would provide reasonable assurance that the health and safety of the public would not be endangered and would not be inimical to the common defense and security, which is necessary to conclude that amendment of License DPR-72 to remove License Condition 2.C.(10) would be appropriate.

While the plain language of 10 CFR 50.54(hh)(3) exempts all facilities that have submitted cessation of operation certifications without regard to whether there is still fuel onsite that is not in an ISFSI – i.e. fuel in the pool, NRR has recognized that this may not be an proper resolution of the comment to the Power Reactor Security Rulemaking and currently is considering rulemaking to affect changes to apply the 10 CFR 50.54(hh)(2) requirements to decommissioning facilities with fuel still in the spent fuel pool.

Request for Additional Information

Given that the licensee must continue to provide adequate emergency response under 10 CFR 50.47, and that the spent fuel must be protected against the design basis threat of radiological sabotage under 10 CFR 73.55, for each element of the License Condition 2.C.(14), provide justification that elimination of that element will not result in operations that would endanger the health and safety of the public or be inimical to the common defense and security, or otherwise, indicate that the element will be maintained in effect:

2.C.(14) Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(1) Firefighting response strategy with the following elements:
- a. Pre-defined coordinated fire response strategy and guidance
- b. Assessment of mutual aid firefighting assets
- c. Designated staging areas for equipment and materials
- d. Command and control
- e. Training of response personnel

(2) Operations to mitigate fuel damage considering the following:
- a. Protection and use of personnel assets
- b. Communications
- c. Minimizing fire spread
- d. Procedures for implementing integrated fire response strategy
- e. Identification of readily-available pre-staged equipment
- f. Training on integrated fire response strategy
- g. Spent fuel pool mitigation measures

(3) Actions to minimize release to include consideration of:
- a. Water spray scrubbing
- b. Dose to onsite responders

RAI 2 Response

CR-3 is withdrawing the request to eliminate License Condition 2.C.(14); all elements will be retained. Replacement pages for the Facility Operating License are included in Attachment D reinstating it as originally imposed.

DUKE ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

LICENSE AMENDMENT REQUEST #316, REVISION 0

ATTACHMENT B

SUPPLEMENT 1 TO LAR #316 REVISION 0

SUPPLEMENT 1 TO LAR #316, REVISION 0

1.0 DESCRIPTION

By letter dated October 29, 2013 (Reference 4.1), Duke Energy Florida, Inc. (DEF) requested an amendment to the Crystal River Unit 3 (CR-3) Facility Operating License (FOL) in License Amendment Request (LAR) #316, Revision 0. The proposed amendment would revise the FOL and the Improved Technical Specifications, creating the Permanently Defueled Technical Specifications (PDTS).

Based on discussions with the NRC staff during the ongoing review of LAR #316, and recent Requests for Additional Information, CR-3 is providing this supplement to LAR #316 which includes replacement pages for the FOL and the PDTS. The replacement pages for the FOL will reinstate License Conditions 2.C.(14), "Mitigation Strategy License Condition," and 2.D, "Physical and Cyber Security," to their original wording prior to the changes requested in LAR #316, Revision 0. The replacement pages for the PDTS will revise the Administrative Controls for: 1) "Onsite and Offsite Organizations" to be consistent with NUREG-1625, "Proposed Standard Technical Specifications for Permanently Defueled Westinghouse Plants," (Reference 4.2) as requested by the NRC Staff and, 2) "High Radiation Area" to be consistent with the current revision of NUREG-1430, "Standard Technical Specifications, Babcock and Wilcox Plants." (Reference 4.3)

PDTS Figure 3.7.15-2 in both the strikeout and shadowed text format, and revision bar format in LAR #316, Revision 0, contained an incorrect page header. The Figure title is also incomplete in that it does not refer to pool 'B'. Corrected pages are included in this Supplement in Attachments E and F.

2.0 Proposed Changes

License Condition 2.C.(14), Mitigation Strategy License Condition

The originally proposed request to delete License Condition 2.C.(14), regarding mitigating strategy provisions, is hereby retracted. This paragraph will be maintained unchanged as shown below.

2.C.(14) Mitigation Strategy License Condition

The licensee shall develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(1.) Fire fighting responses strategy with the following elements:
- a. Pre-defined coordinated fire response strategy and guidance
- b. Assessment of mutual aid fire fighting assets
- c. Designated staging areas for equipment and materials
- d. Command and control
- e. Training of response personnel

(2.) Operations to mitigate fuel damage considering the following:
- a. Protection and use of personnel assets
- b. Communications
- c. Minimizing fire spread

d. Procedures for implementing integrated fire response strategy
e. Identification of readily-available pre-staged equipment
f. Training on integrated fire response strategy
g. Spent fuel pool mitigation measures

(3.) Actions to minimize release to include consideration of:
a. Water spray scrubbing
b. Dose to onsite responders

CR-3 will manage the commitments made in association with implementing the Mitigating Strategies in accordance with NEI 99-04, "Guidelines for Managing NRC Commitment Changes." Specifically, commitments related to the reactor core or the containment will be changed, as appropriate, to the non-operating status of CR-3.

License Condition 2.D, Physical and Cyber Security

The originally proposed request to delete the second paragraph of License Condition 2.D, regarding cyber security provisions, is hereby retracted. This paragraph will be maintained unchanged as shown below.

2.D Physical and Cyber Security

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 2781.7 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Physical Security Plan, Revision 5," and "Safeguards Contingency Plan, Revision 4," submitted by letter dated May 16, 2006, and "Guard Training and Qualification Plan, Revision 0," submitted by letter dated September 30, 2004, as supplemented by letters dated October 20, 2004, and September 29, 2005.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee's CSP was approved by License Amendment No. 238, as supplemented by a change approved by License Amendment No. 242.

Attachment C contains the marked-up FOL pages affected by this Supplement in strikeout and shadowed text format, and Attachment D contains the revised pages in revision bar format.

Revisions to other sections appearing on these FOL pages are shown as previously proposed in the original request (Reference 1), and remain marked up for consistency with the previous submittal.

Technical Specification 5.2.1, Onsite and Offsite Organizations

The NRC Staff notified CR-3 that NUREG-1625, "Proposed Standard Technical Specifications for Permanently Defueled Westinghouse Plants," contains suggested wording for the Administrative Controls Specification 5.2.1, "General Organizational Requirements," for decommissioning plants that was not proposed in LAR #316. The NUREG changes the functional description of the onsite organization from 'unit operation' to 'facility staff.' CR-3 is proposing to adopt the suggested wording in CR-3 Specification 5.2.1, "Onsite and Offsite Organizations," with this Supplement.

Technical Specification 5.8.2 and 5.8.3 regarding High Radiation Area Administrative Controls

The current revision of NUREG-1430, "Standard Technical Specifications – Babcock and Wilcox Plants: Specifications (Revision 4, Volume 1)," contains both lower and upper dose rate limits for defining a high radiation area. These definitions and associated controls implement the requirements of 10 CFR 20.1601 and 20.1602. The existing CR-3 Technical Specifications only contain a lower dose rate limit. CR-3 is proposing to revise the existing definition of high radiation area in Specifications 5.8.2 and 5.8.3 to be consistent with the regulation and NUREG-1430, Revision 4, with this Supplement.

Attachment E contains the marked-up PDTS pages affected by this Supplement in strikeout and shadowed text format, and Attachment F contains the revised pages in revision bar format.

Technical Specification Figure 3.7.15-2

Attachment E contains the corrected PDTS page for this Figure in strikeout and shadowed text format, and Attachment F contains the corrected page in revision bar format.

3.0 Regulatory Analysis

No Significant Hazards Consideration

The conclusions of the no significant hazards consideration contained in Reference 4.1 are not affected by, and remain applicable to, this proposed change.

Environmental Impact Evaluation

The conclusions of the environmental considerations contained in Reference 4.1 are not affected by, and remain applicable to, this proposed change.

Applicable Regulatory Requirements/Criteria

The applicable regulatory requirements/criteria contained in Reference 4.1 are not affected by, and remain applicable to, this proposed change.

4.0 References

4.1 CR-3 to NRC letter, "Crystal River Unit 3 – License Amendment Request #316, Revision 0, Revise and Remove License Conditions and Revision to Improved Technical Specifications to Establish Permanently Defueled Technical Specifications," dated October 29, 2013. (ADAMS Accession No. ML13316C083)

4.2 NUREG-1625, "Proposed Standard Technical Specifications for Permanently Defueled Westinghouse Plants," Draft Report for Comment, dated March 1998.

4.3 NUREG-1430, "Standard Technical Specifications – Babcock and Wilcox Plants: Specifications (Revision 4, Volume 1)," dated April 2012.

DUKE ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

LICENSE AMENDMENT REQUEST #316, REVISION 0

ATTACHMENT C

PROPOSED FACILITY OPERATING LICENSE PAGE CHANGES, STRIKEOUT AND SHADOWED TEXT FORMAT

2.C.(14) Mitigation Strategy License Condition

The licensee shall develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(1.) Fire fighting responses strategy with the following elements:
- a. Pre-defined coordinated fire response strategy and guidance
- b. Assessment of mutual aid fire fighting assets
- c. Designated staging areas for equipment and materials
- d. Command and control
- e. Training of response personnel

(2.) Operations to mitigate fuel damage considering the following:
- a. Protection and use of personnel assets
- b. Communications
- c. Minimizing fire spread
- d. Procedures for implementing integrated fire response strategy
- e. Identification of readily-available pre-staged equipment
- f. Training on integrated fire response strategy
- g. Spent fuel pool mitigation measures

(3.) Actions to minimize release to include consideration of:
- a. Water spray scrubbing
- b. Dose to onsite responders

2.C.(15) ~~Upon implementation of Amendment No 230 adopting TSTF-448, Revision 3, the determination of control complex habitability envelope (CCHE) unfiltered air inleakage as required by Surveillance Requirement (SR) 3.7.12.4, in accordance with ITS 5.6.2.21.3(i) and the assessment of CCHE habitability as required by ITS 5.6.2.21.3(ii), shall be considered met. Following implementation:~~

~~a) The first performance of SR 3.7.12.4, in accordance with Specification 5.6.2.21.3(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 3.0.2, as measured from May 18, 2007, the date of the most recent successful inleakage test.~~

~~b) The first performance of the periodic assessment of CCHE habitability, ITS 5.6.2.21.3(ii), shall be within 3 years, plus the 9-month allowance of SR 3.0.2, as measured from May 18, 2007, the date of the most recent successful inleakage test.~~

~~c) The Control Complex Habitability Envelope Integrity Program will be used to verify the integrity of the Control Complex boundary. Conditions that are identified to be adverse shall be trended and used as part of the 24 month assessment of the CCHE boundary. This assessment will be performed within 60 days of implementation of Amendment~~

F. In accordance with the requirement imposed by the October 6, 1976, order of the United States Court Appeals for the District of Columbia Circuit in Natural Resources Defense Council v. Nuclear Regulatory Commission, No. 74-1385 and 74-1586, that the Nuclear Regulatory Commission "shall make any licenses granted between July 21, 1976 and such time when the mandate is issued subject to the outcome of the proceedings herein," the license issued herein shall be subject to the outcome of such proceedings.

G. This amended license is effective as of the date of issuance. Facility Operating License No. DPR-72, as amended, shall expire at midnight, December 3, 2016.

Amdt. # 97, MAR 31 1987

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed by

Roger S. Boyd, Director
Division of Project Management
Office of Nuclear Reactor Regulation

Attachments:
~~Changes to Technical~~ Appendices A & B - Technical Specifications~~, Appendix A~~

Date of Issuance: JAN 28 1977

DUKE ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

LICENSE AMENDMENT REQUEST #316, REVISION 0

ATTACHMENT D

PROPOSED FACILITY OPERATING LICENSE PAGE CHANGES, REVISION BAR FORMAT

2.C.(14) Mitigation Strategy License Condition

The licensee shall develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(1.) Fire fighting responses strategy with the following elements:
- a. Pre-defined coordinated fire response strategy and guidance
- b. Assessment of mutual aid fire fighting assets
- c. Designated staging areas for equipment and materials
- d. Command and control
- e. Training of response personnel

(2.) Operations to mitigate fuel damage considering the following:
- a. Protection and use of personnel assets
- b. Communications
- c. Minimizing fire spread
- d. Procedures for implementing integrated fire response strategy
- e. Identification of readily-available pre-staged equipment
- f. Training on integrated fire response strategy
- g. Spent fuel pool mitigation measures

(3.) Actions to minimize release to include consideration of:
- a. Water spray scrubbing
- b. Dose to onsite responders

2.C.(15) Deleted per Amendment No.

2.D Physical and Cyber Security

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 2781.7 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Physical Security Plan, Revision 5," and "Safeguards Contingency Plan, Revision 4," submitted by letter dated May 16, 2006, and "Guard Training and Qualification Plan, Revision 0," submitted by letter dated September 30, 2004, as supplemented by letters dated October 20, 2004, and September 29, 2005.

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee's CSP was approved by License Amendment No. 238, as supplemented by a change approved by License Amendment No. 242. I

F. In accordance with the requirement imposed by the October 6, 1976, order of the United States Court Appeals for the District of Columbia Circuit in Natural Resources Defense Council v. Nuclear Regulatory Commission, No. 74-1385 and 74-1586, that the Nuclear Regulatory Commission "shall make any licenses granted between July 21, 1976 and such time when the mandate is issued subject to the outcome of the proceedings herein," the license issued herein shall be subject to the outcome of such proceedings.

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FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed by

Roger S. Boyd, Director
Division of Project Management
Office of Nuclear Reactor Regulation

Attachments:
Appendices A & B - Technical Specifications

Date of Issuance: JAN 2 8 1977

DUKE ENERGY FLORIDA, INC.

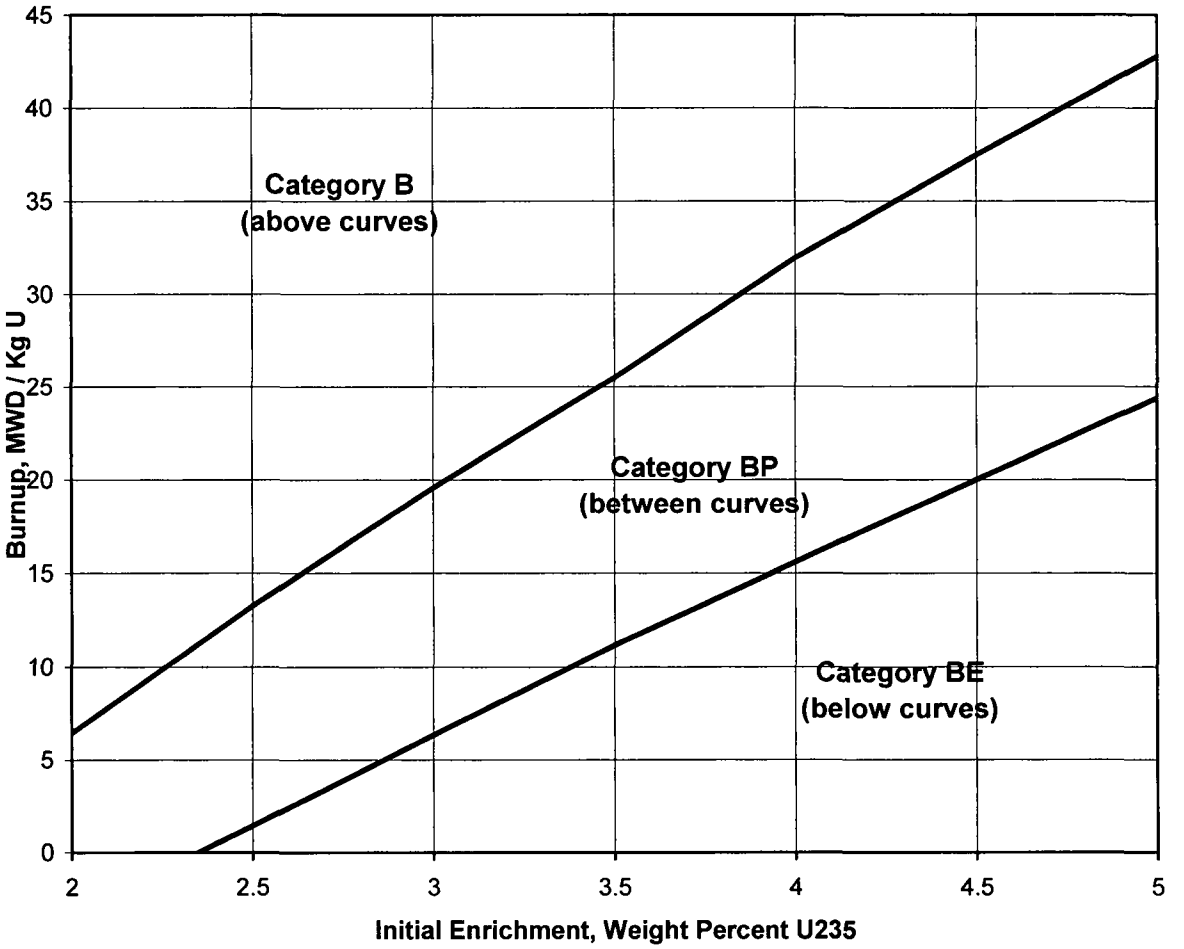
CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

LICENSE AMENDMENT REQUEST #316, REVISION 0

ATTACHMENT E

PROPOSED TECHNICAL SPECIFICATION PAGE CHANGES, STRIKEOUT AND SHADOWED TEXT FORMAT



1. Category B: Fuel from this category can be stored with no restrictions except as noted below.
2. Category BP: Fuel from this category (between lower and upper curves) can be stored in the peripheral cells of the pool.
3. Category BE: Unacceptable for storage unless surrounded by eight empty water cells.
4. Fuel of any enrichment and burnup including fresh, unburned fuel may be stored in Pool B if surrounded by eight empty water cells. Category BE fuel assemblies must be separated by two adjacent empty cells in Pool B.

Figure 3.7.15-2
Burnup versus Enrichment Curve for
Spent Fuel Storage Pool B

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for ~~unit operation~~ facility staff and corporate management, respectively. The onsite and offsite organizations shall include the positions responsible for activities affecting the safe handling and storage of nuclear fuel.

a. Lines of authority, responsibility, and communications shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These shall be documented in the FSAR;

b. The Decommissioning Director shall have overall responsibility for the safe handling and storage of nuclear fuel and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure the safe handling and storage of nuclear fuel. The Plant Manager shall be responsible to control those onsite activities necessary for the safe handling and storage of nuclear fuel; and

c. The individuals who train the Certified Fuel Handlers, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions.

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. Each duty shift shall be composed of at least one Shift Supervisor and one Non-certified Operator.

b. Shift crew composition may be less than the minimum requirement of 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area

5.8.1 Pursuant to 10 CFR 20, paragraph 20.1601(c), alternative methods are used to control access to high radiation areas. Each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation (measured at 30 cm) is > 100 mrem/hr but < 1000 mrem/hr, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device that continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device that continuously integrates the radiation dose in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel are aware of them.

c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance.

5.8.2 In addition to the requirements of Specification 5.8.1, areas with radiation levels ≥ 1000 mrem/hr at 30 cm from the radiation source or from any surface penetrated by the radiation but less than 500 rads/hr at 1 meter from the radiation source or from any surface penetrated by the radiation shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Shift Supervisor or health physics supervision. Doors shall remain locked except during periods of access by personnel.

Direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

(continued)

5.8 High Radiation Area (continued)

5.8.3 For individual high radiation areas with radiation levels of > 1000 mrem/hr at 30 cm from the radiation source or from any surface penetrated by the radiation but less than 500 rads/hr at 1 meter from the radiation source or from any surface penetrated by the radiation, accessible to personnel, that are located within large areas such as reactor containment, where no enclosure exists for purposes of locking, or that are not be continuously guarded, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded and conspicuously posted, and a flashing light shall be activated as a warning device.

DUKE ENERGY FLORIDA, INC.

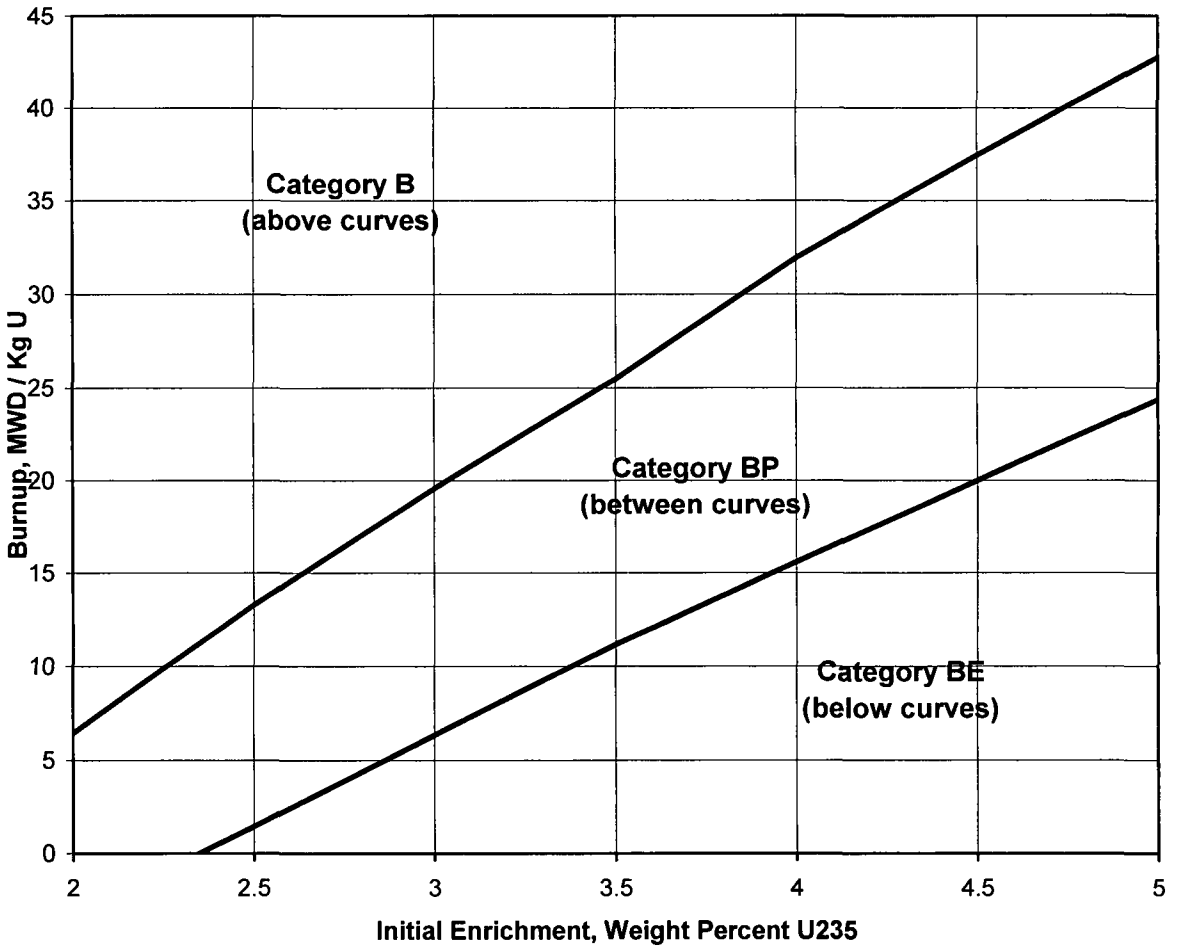
CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

LICENSE AMENDMENT REQUEST #316, REVISION 0

ATTACHMENT F

PROPOSED TECHNICAL SPECIFICATION PAGE CHANGES, REVISION BAR FORMAT



1. Category B: Fuel from this category can be stored with no restrictions except as noted below.
2. Category BP: Fuel from this category (between lower and upper curves) can be stored in the peripheral cells of the pool.
3. Category BE: Unacceptable for storage unless surrounded by eight empty water cells.
4. Fuel of any enrichment and burnup including fresh, unburned fuel may be stored in Pool B if surrounded by eight empty water cells. Category BE fuel assemblies must be separated by two adjacent empty cells in Pool B.

Figure 3.7.15-2
Burnup versus Enrichment Curve for
Spent Fuel Storage Pool B

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for facility staff and corporate management, respectively. The onsite and offsite organizations shall include the positions responsible for activities affecting the safe handling and storage of nuclear fuel.

a. Lines of authority, responsibility, and communications shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These shall be documented in the FSAR;

b. The Decommissioning Director shall have overall responsibility for the safe handling and storage of nuclear fuel and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure the safe handling and storage of nuclear fuel. The Plant Manager shall be responsible to control those onsite activities necessary for the safe handling and storage of nuclear fuel; and

c. The individuals who train the Certified Fuel Handlers, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions.

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. Each duty shift shall be composed of at least one Shift Supervisor and one Non-certified Operator.

b. Shift crew composition may be less than the minimum requirement of 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area

5.8.1 Pursuant to 10 CFR 20, paragraph 20.1601(c), alternative methods are used to control access to high radiation areas. Each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation (measured at 30 cm) is > 100 mrem/hr but < 1000 mrem/hr, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device that continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device that continuously integrates the radiation dose in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel are aware of them.

c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance.

5.8.2 In addition to the requirements of Specification 5.8.1, areas with radiation levels ≥ 1000 mrem/hr at 30 cm from the radiation source or from any surface penetrated by the radiation but less than 500 rads/hr at 1 meter from the radiation source or from any surface penetrated by the radiation shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Shift Supervisor or health physics supervision. Doors shall remain locked except during periods of access by personnel.

Direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

(continued)

5.8 High Radiation Area (continued)

5.8.3 For individual high radiation areas with radiation levels of > 1000 mrem/hr at 30 cm from the radiation source or from any surface penetrated by the radiation but less than 500 rads/hr at 1 meter from the radiation source or from any surface penetrated by the radiation, accessible to personnel, that are located within large areas such as reactor containment, where no enclosure exists for purposes of locking, or that are not be continuously guarded, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded and conspicuously posted, and a flashing light shall be activated as a warning device.