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

March 6, 2015
3F0315-03

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 3 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. NRC to CR-3 letter dated January 8, 2015, "Crystal River Unit 3 Nuclear Generating Plant – Request for Additional Information Regarding the Transition to the Defueled License and Technical Specifications (TAC No. MF3089)" (ADAMS Accession No. ML14274A139)

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 also provides Supplement 3 to LAR #316 providing replacement pages for the FOL.

In Reference 2, the NRC provided RAIs regarding proposed changes to the CR-3 FOL. Attachment A to this letter contains the responses to the RAIs. Attachment B to this letter contains Supplement 3 to LAR #316.

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 is one regulatory commitment which is contained in Attachment E to this correspondence.

If you have any questions regarding this submittal, please contact Mr. Phil Rose, Lead Engineer, Nuclear Regulatory Affairs, at (352) 563-4883.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 6, 2015.

Sincerely,

Ronald R. Reising, Senior Vice President
Operations Support

RRR/par

A001
NRR

Attachments:

A. Response to Requests for Additional Information
B. Supplement 3 to LAR #316, Revision 0
C. Proposed Facility Operating License Page Changes and Strikeout Text Format
D. Proposed Facility Operating License Page Changes, Revision Bar Format
E. Regulatory Commitment

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

By letter dated October 29, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13316C083), Duke Energy Florida, Inc., (the licensee) submitted a License Amendment Request (LAR) regarding the Crystal River Nuclear Generating Plant, Unit 3 (CR-3) facility operating license. The NRC staff determined that the following request for additional information (RAI) is needed to complete the review of the LAR.

RAI #1

The proposed amendment would revise license condition 2.B.(1) which currently states:

> Duke Energy Florida, Inc., pursuant to Section 104b of the Act and [Title] 10 [of the Code of Federal Regulations] 10 CFR Part 50, "Licensing of Production and Utilization Facilities," to possess, use and operate the facility;

Response to RAI #1

In response to this RAI, CR-3 is proposing to revise license condition 2.B.(1) as follows:

> Duke Energy Florida, Inc., pursuant to Section 104b of the Act and [Title] 10 [of the Code of Federal Regulations] 10 CFR Part 50, "Licensing of Production and Utilization Facilities," to possess and use ~~and operate~~ the facility;

Replacement pages are included in Attachments C and D to this correspondence.

RAI #2

The provisions of 10 CFR 50.51(b) require licensees that have provided certifications for permanent cessation of power operations and permanent removal of fuel in accordance with 10 CFR 50.82(a)(1)(i) and 10 CFR 50.82(a)(1)(ii) to take actions necessary to decommission and decontaminate the facility and continue to maintain the facility in a safe condition. The structures and components (SCs) required to maintain the safe operation of the facility during the decommissioning period may remain operational beyond the normal licensed operating period of 40 years. Under the provisions of 10 CFR 50.82, the licensee must complete decommissioning within 60 years of permanent cessation of operations.

The provisions of 10 CFR 50.65 require licensees to monitor performance or condition of structures, systems and component to ensure they are capable of fulfilling their intended function. The scope of the monitoring specified in 10 CFR 50.65(a)(1) applies to safety-related structures, systems, and components as stated in Section 50.65(b)(1) and to nonsafety-related structures, systems, or components whose failure could prevent safety-related structures, systems, and components from fulfilling their intended function as stated in Section 50.65(b)(2)(ii).

The treatment of passive, long-lived SCs under the monitoring program during the original period of operation is likely to involve minimal performance or condition monitoring to maintain functionality. Passive SCs generally have functions that do not have performance and condition characteristics that are as readily observable as SCs that perform active functions. Long-lived SCs may not be subjected to periodic replacement based on a qualified life or specified time

period. The NRC staff needs to determine whether the licensee's programs are sufficient to adequately manage the degradation effects of passive, long-lived SCs to prevent the loss of intended function beyond the normal licensed operating period of 40 years. Licensees, under the provisions of 10 CFR 50.51(b) and 10 CFR 50.82, shall take actions necessary to decommission and decontaminate the facility and continue to maintain the facility, including, the spent fuel pool, in a safe condition until license termination, which period in this case will extend beyond the normal licensed operating period of 40 years.

The licensee does not describe what actions it will take to maintain the spent fuel pool in a safe condition, i.e., how it intends to monitor and maintain the intended function of passive, long-lived SCs (e.g., the neutron absorbing materials) in the spent fuel pool, the fire protection system and the radiation protection system beyond the normal licensed operating period of 40 years. Accordingly, the staff requests that the licensee provide the following information:

1. Identify and list the long-lived, passive SCs (e.g., neutron absorbing materials) in the spent fuel pool, the fire protection system and the radiation protection system that are needed, pursuant to the provisions of 10 CFR 50.51(b), to provide reasonable assurance that safe condition of the spent fuel will be monitored and maintained during the decommissioning period.

2. Provide a summary description of actions that will be taken to monitor and maintain the performance or condition of long-lived, passive SCs, identified in the response to Request 1, to provide reasonable assurance that the long-lived, passive SCs are capable of fulfilling their intended functions during the decommissioning period.

Response to RAI #2

The Permanently Defueled Technical Specification LAR does not seek deletion of any license condition or technical specification that would otherwise require management of the effects of aging of long lived passive components in the spent fuel pool, the fire protection system or the radiation protection system. Thus, RAI #2 does not appear to be within the scope of this LAR. In addition, as discussed below, new aging management programs are unwarranted given the short interval before transfer of all spent fuel to dry storage is completed and the adequacy of existing maintenance and surveillance procedures for the plant's current defueled configuration.

The initial operating license for CR-3 was scheduled to expire in December 2016. The Post-Shutdown Decommissioning Activities Report (PSDAR) projects that all spent fuel will be in dry storage in 2019 (Reference 1). Therefore, the period of extended operations for SCs associated with wet storage of spent fuel is anticipated to be less than 10% of the initial licensed operating period. This minimal increase in service time for SCs associated with the spent fuel pool, fire service system, or radiation monitoring system does not pose a nuclear safety concern for the reasons discussed below.

Spent Fuel Pool (SFP)

CR-3 has been shut down since September 26, 2009, and therefore, the most recently discharged fuel has not been in a critical core for over five years. Reference 2 summarizes analyses that conclude the following:

- Upon a loss of forced cooling, the bulk heat-up rate of SFP water is less than one degree Fahrenheit per hour; and,

- Upon a complete loss of SFP water, the peak spent fuel clad temperature will remain below the clad swelling temperature and well below the zirconium fire temperature.

Therefore, safely storing spent fuel relies principally on:

1. Maintaining storage geometry; and,
2. Maintaining the sub-critical characteristics of the spent fuel storage racks.

With respect to Item 1, CR-3 has programs in place to ensure that spent fuel storage SCs maintain their structural integrity. CR-3 uses procedure EGR0351, "Condition Monitoring of Structures," to review the performance or condition of long-lived, passive, structures and components. The actual implementation of the procedure is controlled through the preventative maintenance program with work orders being generated to inspect and document the findings from the inspection. An experienced civil engineer typically performs the required inspections. Concerning the SFP and SFP support structure, the following specific zones are reviewed:

- Zone A - Auxiliary Building (AB), Elevation 95'
- Zone B - AB, Elevation 119'
- Zone C - AB, Elevation 143'
- Zone I - AB, Elevation 162'
- Zone K - AB Exterior
- SFP concrete walls
- Spent fuel floor crack near Column 301-L, Elevation 162' (this is a specific inspection resulting from the corrective action program)

All of the aforementioned areas have been reviewed in the last 17 months and all inspection criteria have been met. The interval between inspections is currently every four years. Additionally, SFP liner integrity is monitored by the leak detection logsheet in surveillance procedure SP-300D, "Defueled Daily Surveillance Log."

With respect to Item 2, the spent fuel storage racks at CR-3 use two different neutron absorber materials. The "A" SFP racks, installed in 1982, utilize a carborundum sheet material for neutron absorption. The "B" SFP racks were installed in 2001 and rely on Boral for neutron absorption.

The condition of the carborundum racks is assessed by a coupon monitoring program using surveillance procedure SP-192, "High Density Rack Poison Sampling (SF Pool A). Under this procedure, a carborundum weight loss of less than 20% equates to an effective multiplication factor below 0.95. An analysis of the nine coupons retrieved on November 6, 2014, indicate an average poison weight loss of 7% over the 32 year in-service period. An extrapolation of coupon data from 2004 to 2014 indicates a projected carborundum weight loss of approximately 9% in 2023. This is far below the 20% weight loss acceptance criteria.

The criticality analysis for the "B" SFP racks assumes a nominal B-10 areal density. CR-3 does not have a coupon monitoring program for the "B" SFP. However, thus far there have been no industry reports that have identified a concern with respect to the Boral having a loss of B-10 areal density. EPRI Report 1025204, "Strategy for Managing the Long Term Use of Boral® in Spent Fuel Storage Pools," July 2012, contains the following conclusions:

Possible BORAL® performance issues can be divided into two main classes:

A) Safety (criticality safety) relative to the functionality of the B-10 in the core material; and,

B) Operational as characterized by blistering of the BORAL® surface where the aluminum cover material (cladding) separates from the core Boron containing material thus potentially effecting fuel handling.

BORAL® has successfully met all the criticality safety performance requirements for over 25 years of service as demonstrated by the following considerations:

- *There have been no surveillance data or observed cases where there has been significant loss or redistribution of B-10 from BORAL®.*
- *No mechanisms have been identified or observed that would lead to severe degradation of the BORAL® core material.*
- *No mechanisms has been identified that would lead to a sudden loss or reconfiguration of the BORAL® core material.*

The "B" SFP racks are included under the CR-3 Maintenance Rule program in order to monitor for complications in fuel movement due to bulges in rack shape which may indicate degradation of the poison. No complications have been observed in the approximately 14 years that the Boral racks have been in service at CR-3. This site-specific operating experience, coupled with the industry performance cited in the EPRI document, suggest that the spent fuel in the "B" SFP can be safely stored well beyond 2020.

Additionally, CR-3 Technical Specification 3.7.14, "Spent Fuel Pool Boron Concentration," requires that the SFP boron concentration be greater than 1925 ppm during fuel movement. The current boron concentration is greater than 2700 ppm and the boron concentration will be increased prior to dry storage canister loading. This additional shutdown margin is not credited in the steady state spent fuel storage rack criticality analysis.

As indicated in the PSDAR, all spent fuel is projected to be in dry storage in 2019. Therefore, if all spent fuel assemblies have not been removed from the spent fuel pool by December 31, 2019, the licensee shall request, prior to that date, an amendment to the license, pursuant to 10 CFR 50.90, to incorporate Boral and Carborundum surveillance programs into the CR-3 Technical Specifications.

Fire Service (FS) System

CR-3 has implemented a fire protection program that meets the requirements of 10 CFR 50.48(f). The FS system is a diverse system that provides multiple flow paths to move water throughout the plant which uses a 12" underground loop for plant area water supply. The components and maintenance of this system meet National Fire Protection Association codes and Nuclear Electric Insurance Limited Standards with the exception of previously Commission approved deviations from these codes and standards. From an emergency planning perspective, FS is used as a means to provide bulk makeup to the spent fuel pool in the unlikely event of a beyond design basis catastrophic loss of water. This would typically be achieved by any of the five available FS hose reels on the AB 143' and 162' elevations. The time to initiate bulk water addition is much less than the time to reach the zirconium ignition temperature even assuming a non-mechanistic adiabatic heat-up.

The water supply is obtained from the fossil sites located adjacent to CR-3. This system is normally used to fill the FS tank. In an emergency, it has the capability to be cross-tied to the yard loop and provide a supply of water. The Fire Service Water Tank (FST-1A) is monitored to hold a minimum of 300,000 gallons of water. FST-1A is visually inspected annually to determine the condition of the exterior of the tank and the interior is inspected on a five-year frequency.

FST-1A provides suction to one electric and one diesel engine driven fire service pump (FSP-1 and FSP-2A). These pumps will be run on a regular basis (monthly for the diesel and bi-monthly for the electric) along with annual preventative maintenance and surveillance of pump operating parameters on an 18-month frequency (e.g., flow characteristics and auto-starts). FSP-2A is provided diesel fuel from FST-2A. Every two years, the internals of the tank are inspected for degradation and every eight years an Ultrasonic Testing inspection is performed at the bottom of the tank. Additionally, the battery system for FSP-2A is monitored on a weekly basis.

These pumps flow water into an underground yard loop that provides flow to all water-based FS components within the protected area. Two mechanical failures of loop couplings/joints have occurred since 2012 which allowed for opportunistic inspections that were conducted during both repair evolutions. These inspections determined that the failures were not age or flow related.

Additionally, the FS water placed in the system is treated well water and doesn't contain significant amounts of corrosive additives. The valves in the flow path in this loop and along the building piping to the spent fuel pool hose reels are verified in their correct position once a month and exercised at least once annually. The hose reels are visually inspected every 90 days, re-racked every 18 months, and a hydrostatic test of the hose along with validation of flow from the reel is performed every three years.

Within the system there are multiple potential flow paths that would provide an adequate supply to these hose reels allowing for valve alignment to sectionalize any potentially damaged or out of service portions of the system while still providing acceptable flow paths.

CR-3 believes that the actions being taken to maintain and test the Fire Service system are sufficient to assure continued functionality.

Radiation Monitoring (RM) System

For indication and monitoring of spent fuel conditions, during the continued wet storage of the fuel up to and beyond the original 40 year life of the plant, CR-3 will maintain a portion of the Radiation Monitoring System. This will consist of area Gamma monitors and continuous air monitors in the area of the pool and in the gaseous effluent flow path from the pool. Specifically, RM-G14 (in the valve alley next to the pool), RM-G15 (on the Auxiliary Building fuel handling bridge crane), RM-A4 (sampling from the fuel pool ventilation), and RM-A2 (sampling from the main plant vent) will be used to monitor and alarm on increases in radiation. All of these monitors alarm when a specific radiation level is reached, alarm on low level, or alarm on channel failure. The continuous air monitors also will alarm on high or low flow through the monitor. These monitors are tested quarterly and maintained to assure continued functionality. Contingency plans such as manual radiation surveys can be implemented should a monitor become non-functional. Other surveillance activities, such as

observation of the pool water level or pool temperature are performed daily to assure that abnormal conditions in the pool are not developing.

The CR-3 Radiological Emergency Response Plan (RERP) includes Emergency Action Levels that list many of these instruments as components that could indicate that conditions are such that entry into or escalation between different accident categories is required. These radiation monitors are maintained as important to the emergency plan as discussed in EM-500, "Equipment Important to Emergency Preparedness and Response," with specific activities identified as compensatory measures. These radiation monitors will continue to be listed as equipment important to Emergency Preparedness after conversion to the Permanently Defueled Emergency Plan as long as fuel remains in the Spent Fuel Pool.

The safety-related Systems, Structures, or Components remaining at the plant are all associated with maintaining the spent fuel in a safe configuration, while the RM system is used to alert the operators of an unusual or catastrophic event. Failure of any of the Radiation Monitoring components or devices will have no impact on the performance of the safety functions. Upon alarming from loss of power or component failure, compensatory actions, such as manual local area surveys or grab samples, will be instituted to assure that the Control Room staff remain cognizant of the radiation areas around the spent fuel.

Surveillance Testing (SP-335A, SP-335B, SP-335F) performed assures continued functionality while installed spares of identical, abandoned equipment will be available in the plant in the event of a catastrophic failure. The surveillance testing does not differentiate between active or passive failures. Since the surveillance program and system design assure that failures would be detected, there is reasonable expectation that the Radiation Monitoring System will continue to reliably function.

References

1. CR-3 to NRC letter dated December 2, 2013, "Crystal River Unit 3 – Post-Shutdown Decommissioning Activities Report" (ADAMS Accession No. ML13340A009)

2. CR-3 to NRC letter dated September 26, 2013, "Crystal River Unit 3 – License Amendment Request #315, Revision 0, Permanently Defueled Emergency Plan and Emergency Action Level Scheme and Request for Exemption to Certain Radiological Emergency Response Plan Requirements Defined by 10 CFR 50" (ADAMS Accession No. ML13274A584)

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 3 TO LAR #316, REVISION 0

SUPPLEMENT 3 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 CR-3 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 Request for Additional Information, CR-3 is providing Supplement 3 to LAR #316 which includes replacement pages for the proposed FOL.

2.0 Proposed Changes

Replacement pages are included in Attachments C and D to this letter.

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)

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 AND STRIKEOUT TEXT FORMAT

B Subject to the conditions and requirements incorporated herein, the Commision hereby licenses:

(1) Duke Energy Florida, Inc., pursuant to Section 104b of the Act and 10 CFR Part 50, "Licensing of Production and Utilization Facilities," to possess, use ~~and operate~~ the facility; and

(2) The licensees to possess the facility at the designated location in Citrus County, Florida, in accordance with the procedures and limitations set forth in this license;

(3) Duke Energy Florida, Inc., pursuant to the Act and 10 CFR Part 70, to ~~receive~~, possess ~~and use~~ at any time special nuclear material ~~as~~ reactor fuel, in accordance with the limitations for storage ~~and amounts required for reactor operation,~~ as described in the Final Safety Analysis Report, as supplemented and amended~~;~~ configured

(4) Duke Energy Florida, Inc., pursuant to the Act and 10 CFR Parts 30, 40 and 70 to ~~receive,~~ possess ~~and use~~ at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, as fission detectors, and sealed sources for reactor instrumentation ~~and radiation monitoring equipment calibration, and as fission detectors~~ in amounts as required; used previously

(5) Duke Energy Florida, Inc., pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radio- and to possess and use at any time any byproduct, source, and special nuclear material as sealed sources for radiation monitoring equipment calibration

(6) Duke Energy Florida, Inc., pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

2.B.(7) Duke Energy Florida, Inc., pursuant to the Act and 10 CFR Parts 30 and 70, to receive and possess, but not separate, that by-product and special nuclear materials associated with four (4) fuel assemblies (B&W Identification Numbers 1A-01, 04, 05 and 36 which were previously irradiated in the Oconee Nuclear Station, Unit No. 1) acquired by Florida Power Corporation from Duke Power Company for use as reactor fuel in the facility. *** Added Per Amdt. 15, 7-24-78

C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 and 50.59 of part 50, Section 70.32 of Part 70; and is subject to all applicable provisions

***On April 29, 2013, the name "Florida Power Corporation" was changed to "Duke Energy Florida, Inc."

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

B Subject to the conditions and requirements incorporated herein, the Commision hereby licenses:

(1) Duke Energy Florida, Inc., pursuant to Section 104b of the Act and 10 CFR Part 50, "Licensing of Production and Utilization Facilities," to possess and use the facility;

(2) The licensees to possess the facility at the designated location in Citrus County, Florida, in accordance with the procedures and limitations set forth in this license;

(3) Duke Energy Florida, Inc., pursuant to the Act and 10 CFR Part 70, to possess at any time special nuclear material configured as reactor fuel, in accordance with the limitations for storage as described in the Final Safety Analysis Report, as supplemented and amended;

(4) Duke Energy Florida, Inc., pursuant to the Act and 10 CFR Parts 30, 40 and 70 to possess at any time any byproduct, source and special nuclear material as sealed neutron sources used previously for reactor startup, as fission detectors, and sealed sources for reactor instrumentation and to possess and use at any time any byproduct, source, and special nuclear material as sealed sources for radiation monitoring equipment calibration in amounts as required;

(5) Duke Energy Florida, Inc., pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components;

(6) Duke Energy Florida, Inc., pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

2.B.(7) Duke Energy Florida, Inc., pursuant to the Act and 10 CFR Parts 30 and 70, to receive and possess, but not separate, that by-product and special nuclear materials associated with four (4) fuel assemblies (B&W Identification Numbers 1A-01, 04, 05 and 36 which were previously irradiated in the Oconee Nuclear Station, Unit No. 1) acquired by Florida Power Corporation*** from Duke Power Company for use as reactor fuel in the facility.

Added Per Amdt. 15, 7-24-78

C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 and 50.59 of part 50, Section 70.32 of Part 70; and is subject to all applicable provisions

***On April 29, 2013, the name "Florida Power Corporation" was changed to "Duke Energy Florida, Inc."

DUKE ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72

LICENSE AMENDMENT REQUEST #316, REVISION 0

ATTACHMENT E

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) Lead Engineer, Nuclear Regulatory Affairs of any questions regarding this document or any associated regulatory commitments.

Regulatory Commitment	Due Date/Event
If all spent fuel assemblies have not been removed from the spent fuel pool, the licensee shall request, prior to that date, an amendment to the license, pursuant to 10 CFR 50.90, to incorporate Boral and Carborundum surveillance programs into the CR-3 Technical Specifications.	December 31, 2019