



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 2, 2016
3F0316-03

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

Subject: Crystal River Unit 3 – License Amendment Request #318, Revision 0, Permanently Defueled Emergency Plan, Revision 2, and Emergency Action Level Scheme, Revision 1, for the Independent Spent Fuel Storage Installation Response to Request for Additional Information

- References:
1. NRC to CR-3 letter dated February 04, 2016, Crystal River Unit 3 Nuclear Generating Plant – Request for Additional Information License Amendment Request for Emergency Plan Changes (TAC NO. L53072) (Adams Accession No ML16032A177)
 2. CR-3 to NRC letter dated August 27, 2015, “Crystal River Unit 3 – License Amendment Request #318, Revision 0, Permanently Defueled Emergency Plan, Revision 2, and Emergency Action Level Bases Manual, Revision 1, for the Independent Spent Fuel Storage Installation (ADAMS Accession No. ML15246A231)

Dear Sir:

In accordance with the provisions of 10 CFR 50.90, Duke Energy Florida, LLC, previously known as Duke Energy Florida, Inc., hereby submits the response to the Nuclear Regulatory Commission (NRC) request for additional information (RAI). This RAI (Reference 1) was provided to Crystal River Unit 3 (CR-3) from the NRC Project Manager on February 4, 2016, regarding the CR-3 submittal, “Permanently Defueled Emergency Plan and Emergency Action Level Bases Manual, for the Independent Spent Fuel Storage Installation” (Reference 2).

Enclosure 1 to this letter provides the RAI response.

Enclosure 2 to this letter provides a corrected PDEP Summary of Changes.

This correspondence contains no new regulatory commitments.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 2, 2016.

Sincerely,



Ronald R. Reising, Senior Vice President
Operations Support

RRR/par

Enclosures: 1. Response to Request for Additional Information
2. Corrected PDEP Summary of Changes

xc: NMSS Project Manager
Regional Administrator, Region 1

DUKE ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50 - 302 / LICENSE NUMBER DPR - 72

**PERMANENTLY DEFUELED EMERGENCY PLAN, REVISION
2, AND EMERGENCY ACTION LEVEL BASES MANUAL,
REVISION 1, RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION**

ENCLOSURE 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

By letter dated August 27, 2015 (Reference 1), Duke Energy Florida, LLC., previously known as Duke Energy Florida, Inc., (DEF) requested that the Nuclear Regulatory Commission (NRC) review and approve License Amendment Request (LAR) #318, Revision 0, "Permanently Defueled Emergency Plan (PDEP), Revision 2, and Emergency Action Level Bases Manual, Revision 1. In a letter dated February 4, 2016, the NRC provided a request for additional information (RAI) regarding LAR #318, Revision 0 (Reference 2).

The RAI questions and the Crystal River Unit 3 (CR-3) responses are provided below. These responses clarify the revision number process used by DEF and the removal of the reference to the Emergency Management Network (EMNET) tool from the Permanently Defueled Emergency Plan (PDEP).

CR-3-RAI-01

In a letter dated May 23, 2014 (ADAMS Accession No. ML14154A408), DEF submitted Revision 1 to the PDEP and Revision 1 to the Permanently Defueled EAL Bases Manual. In a letter dated October 6, 2014 (ADAMS Accession No. ML14288A122), DEF submitted Revision 2 to the PDEP. Finally, in the August 27, 2015, letter cited above, DEF submitted Revision 2 to the PDEP and Revision 1 to the Permanently Defueled EAL Bases Manual (duplicate numbers, in both cases, to previous submittals). Please explain the revision numbering process for both documents.

RAI-01 Response

When the PDEP and Permanently Defueled EAL Bases Manual were submitted on September 26, 2013 for staff review, a decision had not been made as to how any additional changes made to these documents during the staff review and approval process would be tracked. Subsequently, an internal convention, which used the same revision numbering (i.e. Rev. 1, Rev. 2) system for these documents that is used for controlled documents at the station after they are issued, was adopted to differentiate versions of the PDEP and EAL Bases Manual created as responses to Requests for Additional Information (RAI) were submitted. In hindsight, a unique numbering system should have been used to track these draft revisions while initial approval of these documents was still in progress. This condition has been entered into the CR3 corrective action program.

Following receipt of NRC approval on March 31, 2015, both the PDEP and the Permanently Defueled EAL Bases Manual were formally issued at the station as Revision 0.

A subsequent revision to the PDEP was made under 10 CFR 50.54 (q) to clarify requirements for Self Contained Breathing Apparatus (SCBA) training for emergency response personnel. This resulted in the formal issue of Revision 1.

During preparation of LAR #318, the same internal numbering convention was carried forward, resulting in confusion between the current draft submittals under review as the PDEP, Revision 2, and Permanently Defueled EAL Bases Manual, Revision 1, and the previous draft submittals made under LAR #315. Although the revision numbering of the documents submitted appears to be a duplication, the documents submitted under LAR #318 correctly reflect the planned changes for which staff approval is requested.

CR-3-RAI-02

In the May 23, 2014, DEF letter cited above, containing Revision 1 to the PDEP, it is noted in the "Summary of Changes" that references were deleted from the Emergency Management Network (EMnet) as the back-up communications system to the State Watch Office. The August 27, 2015, DEF letter containing Revision 2 to the PDEP, also states "Deleted EMnet." Please explain the revision process regarding the elimination of EMnet, since based on DEF's May 23, 2014 correspondence, it is understood that commercial telephones (landlines) or cellular telephones are viewed as the back-up means of communications (to the State Hot Ringdown) with off-site emergency response organizations. Also, please confirm that the State of Florida is in agreement with the means of communication between CR-3 and the State.

RAI-02 Response

The August 27, 2015 License Amendment Request contained an administrative error that was not identified, where the summary of changes contained in the PDEP referenced the Emergency Management Network (EMnet) in error. The CR-3 PDEP was issued to the plant on April 1, 2015 as Revision 0 and did not contain any reference to the use or testing of EMnet. None of the subsequent revisions to the PDEP contained any reference to EMnet. EMnet is no longer used at CR-3 and is not part of the PDEP. A corrected Summary of Changes is included as Enclosure 2 to this letter.

CR-3 confirms that the State of Florida Division of Emergency Management, Radiological Emergency Preparedness Program is in agreement with the current methods of communication, including commercial telephones (landlines) and cellular phones used as back-up communications.

DUKE ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50 - 302 / LICENSE NUMBER DPR - 72

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ENCLOSURE 2

CORRECTED PDEP SUMMARY OF CHANGES

Summary of Changes
DRR 752017

PAGE / SECTION	CHANGE	REASON & REFERENCES
Cover Sheet	Changed Emergency Planning Coordinator Name to current EPC	Update Staffing change
Throughout	Updated Decommissioning Director to new title, General Manager, Decommissioning	SAFSTOR organization title change
Throughout	DTO or Decommissioning Transition Organization has been replaced with the title SAFSTOR organization	DTO is now called the SAFSTOR organization
Throughout	Replaced "Plant Manager" with "Operations and Maintenance Manager"	SAFSTOR organization title change
Throughout	Changed "Emergency Preparedness Coordinator" to "Emergency Planning Coordinator"	Correct erroneous title
Table of Contents	Updated Section Title and page numbers	Format update
Table of Contents, page v	Deleted reference to [R3] NOCS 100477, the RERP and EALs Updated to Reflect Information Corresponding to NUMARC/NESP-007, Guidance in NRC Bulletin 2005-02, Attachment 2, Pages 6-7	Commitment
Page 2-1, Section 2.1	Changed wording from "as applicable to CR3 in its permanently shutdown and defueled status" to "with approved exemptions that reflect CR3 in its permanently shutdown and defueled status"	Editorial. Reflects current PDEP
Page 2-2	Added to the "facility description" the "ISFSI facility" description	ISFSI added to PDEP
Page 4-5, Section 4.2	Changed DEF acronym from Duke Energy Florida, Inc. to Duke Energy Florida	Editorial
Page 4-3	Added ISFSI definition	ISFSI added to PDEP
Page 4-5	Removed DTO and added ISFSI	DTO transitioned into SAFSTOR. ISFSI is a new facility
Page 5-5, step 5.5.4.1	Retitled Citrus County Dispatch Center to be 911 dispatch center	Update title
Page 6-1, step 6.1	Added management of the ISFSI activities to the SS/CFH	ISFSI facility added. (LAR 318)
Page 6-7, section 6.4	Corrected title of Dhiaa Jamil to Executive Vice President & President Regulated Generation and Transmission	Update title per Org. Chart
Page 6-4 step 6.2.3.1 and re-numbered	Removed communicator position	ERO position reduction (LAR 318)

Summary of Changes

PAGE / SECTION	CHANGE	REASON & REFERENCES
Page 6-6 step 6.2.5	Re-titled Fire Brigade to Industrial Incipient Fire Brigade	Update titles
Page 6-7 and throughout	Re-titled Vice President to present title of Senior Vice President of Operations Support	Update titles
Page 6-8, Table 6.1	Deleted reference to MCR Communicator	ERO position reduction (LAR 318)
Page 6-9, Figure 6.1	Deleted reference to MCR Communicator	ERO position reduction (LAR 318)
Page 8-1, step 8.1	Added NEI 99-01 Reference for ISFSI EAL	ISFSI EAL addition (LAR 318)
Page 8-2, step 8.2	Added ISFSI EAL category	ISFSI EAL addition (LAR 318)
Page 9-3, Section 9.3	Added “notification” and removed “emergency incident” on the first paragraph, last sentence	Time of “notification” is appropriate in lieu of time of “emergency incident”
Page 10-1, step 10.1	Replaced Communicator with Emergency Coordinator as being responsible for communications	Deleted Communicator ERO position (LAR 318)
Page 12-3, step 12.2.1	Added” Portable radiation monitoring instruments are maintained to support ISFSI operations including transfer operations of the Dry Shielded Canister (DSC) to the Horizontal Storage Module (HSM) and for monitoring of the spent fuel while in storage in the HSM”	Added instrumentation available to support ISFSI operations
Page 15-4, step 15.3.3	Removed words “is affected”	Editorial wording correction
Page 18-5, step 18.4 and throughout	Replaced EP Supervisor with Emergency Planning Coordinator	SAFSTOR organization does not have a EP Supervisor
Page 19-1, Section 19.0	Removed words “communications personnel”	MCR Communicator being eliminated (LAR 318)
Page 19-3, step 19.1.7	Deleted training reference for MCR Communicator	ERO position reduction (LAR 318)
Page 19-4, Table 19.1	Deleted training reference for MCR Communicator	ERO position reduction (LAR 318)