



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JULY 23 1979

Docket No.: 50-302

Mr. W. P. Stewart
Manager, Nuclear Operations
Florida Power Corporation
P. O. Box 14042, Mail Stop C-4
St. Petersburg, Florida 33733

Dear Mr. Stewart:

RE: CRYSTAL RIVER, UNIT NO. 3

In late 1975 we incorporated provisions into the Standard Technical Specification (STS) that required limiting conditions for operation and surveillance requirements for secondary water chemistry parameters. The Technical Specifications for your plant(s), as well as all other Pressurized Water Reactor plants that have been issued an Operating License since 1974, either contain these provisions, or a requirement to establish these provisions after baseline chemistry conditions have been determined. The intent of the provisions was to provide added assurance that the operators of newly licensed plants would properly monitor and control secondary water chemistry to limit corrosion of steam generator tubes.

In a number of instances the Technical Specifications have significantly restricted the operational flexibility of some plants with little or no benefit with regard to limiting corrosion of steam generator tubes. Based on this experience, and the knowledge gained in recent years, we have concluded that Technical Specification limits are not the most effective way of assuring that steam generator tube corrosion will be minimized.

Due to the complexity of the corrosion phenomena involved, and the state-of-the-art as it exists today, we believe that, in lieu of Technical Specifications, a more effective approach would be to institute a license condition that requires the implementation of a secondary water chemistry monitoring and control program containing appropriate procedures and administrative controls. A Model License Condition that is acceptable to the staff for this purpose is enclosed.

The required program and procedures would be developed by the licensees, with any needed input from their reactor vendors or other consultants, and thus could more readily account for site and plant specific factors that affect chemistry conditions in the steam generators. In our view, such a license condition would provide assurance that licensees would devote proper attention to controlling secondary water chemistry, while also providing the needed flexibility to allow them to more effectively deal with any off-normal conditions that might arise. Moreover, we have concluded that such a license condition, in conjunction with existing Technical Specifications on steam generator tube leakage and inservice inspection, would provide the most practical and comprehensive means of assuring that steam generator tube integrity would be maintained.

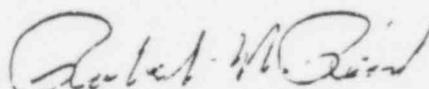
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Consequently, we request that you submit a proposed amendment to your license to delete your existing Technical Specifications on secondary water chemistry and to incorporate the requirements of the enclosed Model License Condition into the body of your license within 60 days.

If you previously submitted an application for a license amendment concerning steam generator monitoring requirements prior to March 22, 1978, that has yet to be issued by the NRC, you need not remit a fee for the license amendment requested by this letter. If you have not submitted a license amendment request prior to March 22, 1978, you should remit a Class III fee with your application.

If you have any questions, please contact us.

Sincerely,



Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

Enclosure:
Model License Condition

cc w/enclosure:
See next page

Florida Power Corporation

cc: Mr. S. A. Brandimore
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MODEL LICENSE CONDITION

SECONDARY WATER CHEMISTRY MONITORING

The licensee shall implement a secondary water chemistry monitoring program to inhibit steam generator tube degradation. This program shall include:

1. Identification of a sampling schedule for the critical parameters and control points for these parameters;
2. Identification of the procedures used to quantify parameters that are critical to control points;
3. Identification of process sampling points;
4. Procedure for the recording and management of data;
5. Procedures defining corrective actions for off control point chemistry conditions; and
6. A procedure identifying the authority responsible for the interpretation of the data, and the sequence and timing of administrative events required to initiate corrective action.