UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30303

APR 19 1979

SSINS 8150

MEMORANDUM FOR: E. L. Jordan Assistant Director for Technical Programs, Division of Reactor Operations, IE:HQ

FROM: R. C. Lewis, Acting Chief, Reactor Operations and Nuclear Support Branch

SUBJECT: REGION II COMMENTS ON CRYSTAL RIVER RESPONSE TO IEB 79-05 AND 79-05A (ITEMS 6-12)

Comments are keyed to the numbered response in Florida Power Corporation's response dated April 12, 1979.

Item 6

Comment (1)

The response is not clear for the second column added to the right of the table (entitled "Isolation by Automatic HPI Actuation"). Does a "Yes" answer mean that system logic already exists to close the valve automatically upon HPI actuation? Or, is this a modification made in response to this bulletin? Or, scheduled to be made? (The licensee has stated that this "Yes" means a modification is being considered for implementation).

Comment (2)

Several items have been identified as required for core cooling ("Yes" in column entitled "Required for Core Cooling"). These components do not appear necessary for core cooling, are closed on a high RB pressure signal, and could be closed without inhibiting HPI cooling to the core. These items are:

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Penetration No.	Service
204, 366 207, 367	Industrial Cooler Water Supply to RB Cavity Cooling
315	RB Air Sample Line
321, 360 322, 361	Nuclear Cooling to Letdown Coolers
330 331	Nuclear Service Cooling to CRDM's
332	RB Air Sample Line
333	Letdown Line to Purification Demineralizers
334	Decay Coolant Letdown

Comment (3)

On those valves that are not to be isolated (and not required for core cooling) provide justification for not having a "close" signal. The licensee should describe the program which assures that they are already closed.

Item 8

Comment (1)

The licensee has not identified valves in the suction path that are relevant to this response.

Item 9

Comment (1)

The licensee has omitted reactor building, RCS, core flood, and steam generator sample lines. The core flood tank vent and steam generator drain lines have been omitted. (Although Item 9 refers to "pumping", the above containment penetrations appear relevant.)

Comment (2)

The licensee's discussion of the RB sump pump interlock refers to a modification to be implemented (to assure against inadvertent pumping of the sump contents when high radiation might be present). The date when this modification will be complete is omitted.

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The licensee states that operating practice is to keep the sump pumps in "pull-to-lock" preventing any automatic pumping of the sump.

Comment (3)

The licensee has not stated whether or not resetting engineered safety features instrumentation would automatically reopen the paths from the containment described in the response. Also, the enclosed table has a column entitled "Automatic Setting of Signal..." which appears incorrect.

Richard C. Lewis, Acting Chief
Director Operations and Nuclear
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cc: S. E. Bryan
E. L. Jordan
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