

50-302

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FILE NUMBER

TO:

Mr. John Stolz

FROM:

Florida Power Corp.  
St. Petersburg, Fla.  
Mr. J. T. Ridgers

DATE OF DOCUMENT

12/15/76

DATE RECEIVED

12/27/76

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Ltr. re their 9/22/76 ltr....trans the following:

NOTE: Same distribution as control #9861-

PLANT NAME:

Crystal River

(3-P)

ENCLOSURE

Surveillance and Inservice Inspection  
Program - Florida Power Corporation -  
Crystal River Unit 3 -

ACKNOWLEDGED

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(75-P)

## SAFETY

## FOR ACTION/INFORMATION

## ENVIRO

12/29/76

RJL

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<input checked="" type="checkbox"/> PROJECT MANAGER:	Engle	<input checked="" type="checkbox"/> PROJECT MANAGER:
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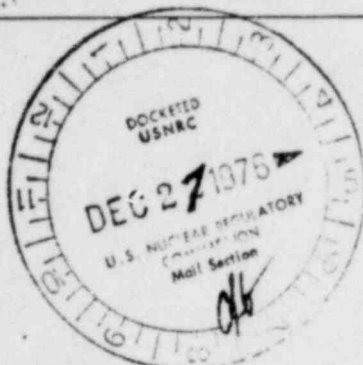
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GOSSICK & STAFF		ENGINEERING	IPPOLITO	ENVIRO TECH.
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CASE	<input checked="" type="checkbox"/>	KNIGHT (4)		BALLARD
HANAUER		SIHWEIL	OPERATING REACTORS	SPANGLER
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				SITE TECH.
PROJECT MANAGEMENT		REACTOR SAFETY	OPERATING TECH.	GAMMILL
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<input checked="" type="checkbox"/> ACRS 16 CYS HOLDING/SENT: CAT. B. (12/29/76)			



December 15, 1976

Mr. John Stolz  
Branch Chief  
Light Water Reactors Branch I  
Division of Project Management  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Crystal River Unit #3  
Operating License DPR-72  
Docket No. 50-302

Dear Mr. Stolz:

On September 22, 1976, Florida Power Corporation filed with the Commission a request that FPC be granted written relief from the requirements of Section 4.0.5 of the Crystal River #3 Technical Specifications, pursuant to 10 CFR, Section 50.55a(g)(6)(i), for the initial period of operation of CR#3. As basis for our request, we filed with the NRC the planned Surveillance and Inservice Inspection Program for CR#3, which would be implemented in lieu of the requirements of Section 4.0.5 of the CR#3 Technical Specifications.

It was emphasized in our September 22, 1976 letter that Florida Power Corporation (FPC) was prepared to accommodate the previous requirements for surveillance and inservice inspection contained in STC "Proof & Review Copy" received March 30, 1976, and that our procedures, hardware, and operator training were so accomplished. We further stated that a review of the new requirements of 4.0.5 requires us to complete the following:

1. Perform an intensive review of ASME Section XI to determine specific requirements for inservice inspection of all Class 1, 2, and 3 components and surveillance requirements for all pumps and valves.

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2. Relate requirements to specific pieces of equipment to determine if surveillance testing or inservice inspection can be performed. If it cannot, an exclusion needs to be requested.
3. Rewrite Surveillance Procedures to reflect new requirements. Out of the 134 Surveillance Procedures currently developed from our STS, 67, or 50%, will require extensive rewriting.

Compliance with 50.55(a) provisions to the extent practical is still our intent and we are presently assessing how to carry out the code interpretations.

Since our September 22, 1976 filing, we met with you and members of your staff to discuss our request for relief from the requirements of Section 4.0.5. As a result of this meeting, you requested FPC to resubmit our filing with the corrections made that were discussed at our meeting, in an attempt to better define the program that will be performed during our assessment of the code requirements.

We are hereby submitting for your staff's review forty (40) copies of Florida Power Corporation's planned Surveillance and Inservice Inspection Program. This program consists of the attached requirements (which were included in the March 30, 1976 Proof and Review Copy of the CR#3 STS), plus the requirements of the CR#3 Technical Specifications contained in Appendix A to Operating License DPR-72, dated December 3, 1976, with the exception of Section 4.0.5 and all references to that section, either stated or implied. It is hoped that this resubmittal will better define for your staff our interim Surveillance and Inservice Inspection Program for CR#3.

Based on this submittal, we request that the Commission grant FPC written relief from the requirements of Section 4.0.5 of the CR#3 STS, for the first year of operation, in order that we may conduct an orderly assessment and implementation, to the extent practical, of the requirements of Section 4.0.5. We feel that this request is justified, as the program identified herein was developed on what was thought to be final and approved Technical Specification requirements from the NRC, and does provide adequate surveillance of plant systems to insure the safe operation of CR#3 during the interim period while we complete our assessment of the 4.0.5 requirements.

Mr. John Stolz

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December 15, 1976

Should additional discussion be required, please do not  
hesitate to call us.

Very truly yours,

*E. C. Simpson*  
for / J. T. Rodgers  
Asst. Vice President

JTR/iw