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CRYSTAL RIVER - UNIT 3 XII

#### INSTRUMENTATION

#### FIRE DETECTION INSTRUMENTATION

#### LIMITING CONDITION FOR OPERATION

3.3.3.7 As a minimum, the fire detection instrumentation for each fire detection zone shown in Table 3.3-11 shall be OPERABLE.

APPLICABILITY: Whenever equipment in that fire detection zone is required to be OPERABLE.

ACTION:

With one or more of the fire detection instrument(s) shown in Table 3.3.11, inoperable:

- Within 1 hour, establish a fire watch patrol to inspect the zone(s) with the inoperable instrument(s) at least once per hour, and
- b. Restore the inoperable instrument(s) to OPERABLE status within 14 days or in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the action taken, the cause of the malfunction and the plans and schedule for restoring the instrument(s) to OPERABLE status.
- c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.7.1 Each of the above fire detection instruments shall be demonstrated OPERABLE at least once per 6 months by performance of a CHANNEL FUNCTIONAL TEST.

4.3 3.7.2 The circuitry associated with the detector alarms listed in Table 3.3-11 shall be demonstrated OPERABLE at least once per 6 months for all National Fire Protection Association (NFPA) Code 72D Class B supervised circuits.

4.3.3.7.3 THE non-supervised circuits between the local panels and the control room for the detectors listed in Table 3.3-11 shall be demonstrated OPERABLE at least once per 31 dyas.

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TABLE 3.3-11 FIRE DETECTION INSTRUMENTS

DETE	CTOR	LOCATION		DETECTORS OPERABLE HEAT/SMOKE
1.	Cont	Complex		
			10010	
	а.	Lievation	108-0-	
		1. Zone	4 (Plant Battery Room 3B) 5 (Plant Battery Room 3A)	NA/1 NA/1
		3. Zone	6 (Battery Charger Room 3B)	NA/1
		4. Zone	7 (Battery Charger Room 3A)	NA/1
		5. Zone	8 (4160V Switchgear Bus Room 3B)	NA/1
		6. Zone	9. (4160V Switchgear Bus Room 3A)	NA/1
		7. Zone	10 (Inverter Room 3B)	NA/I
		8. Zone	11 (Inverter Room 3A)	NA/I
	b.	Elevation	120'0"	
		1. Zone	5 (Control Rod Drive Equipment Room	m) NA/2
		2. Zone	7 (480V Switchgear Bus Room 3B)	NA/1
		3. Zone	8 (480V Switchgear Bus Room 3A)	NA/1
	с.	Elevation	134'0'	
		1. Zone	3A (Cable Spreading Room)	NA/5
		2. Zone	3B (Cable Spreading Room)	NA/3
	d.	Elevation	145'0"	
			A (C-t-1)its Instant Chan and O	Frice MA /2
		1. Lone 2. Zone	4 (Satellite Instrument Shop and 0 5 (Control Room)	1/6
		<ol> <li>c. conc</li> </ol>	, , ,	
ee.	e.	Elevation	164'0"	
		1 7008	3 (HVAC Foul ment Room)	NA /5
		2. Zone	4 (HVAC Emergency Equipment 3B)	NA/1
		3. Zone	5 (HVAC Emergency Equipment 3A)	NA/1
2	A	iliany Duil	dina	
۲ <b>с</b> .	Aux	illary built	ung	
	а.	Elevation	119'0"	
		1. Zone	20 (Emergency Diesel Generator 3B	1 / 11 0
		2. Zone	21 (Emergency Diesel Generator 3A	1/104
		2 7	Controls Room)	1/NA
		s. Zone	27 (Emergency Diesel Generator Roc	3B) 5/11A
ICRY	STAL	RIVER - ZONS	T <sup>28</sup> (Emergency Diesel Generator Roc 3/4 3-41	om 3A) 5/NA

## 3/4.7.11 FIRE SUPPRESSION SYSTEMS

#### FIRE SUPPRESSION WATER SYSTEM

#### LIMITING CONDITION FOR OPERATION

3.7.11.1 The fire suppression water system shall be OPERABLE with:

- a. At least two high pressure pumps each with a capacity of 2000 gpm, with their discharge aligned to the fire suppression header.
- b. Separate water.supplies, each with a minimum contained water volume of 345,000 gallons.
- c. An OPERABLE flow path capable of taking suction from the water supply and transferring the water through distribution piping with OPERABLE sectronalizing control or isolation valves to the yard hydrant curb valves and the front valve ahead of the water flow alarm device on each sprinkler, hose standpipe and spray system riser required to be OPERABLE per Specifications 3.7.11.2 and 3.7.11.4.

APPLICABILITY: At all times.

ACTION:

- a. With one pump and/or one water supply inoperable, restore the inoperable equipment to OPERABLE status within 7 days or, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the plans and procedures to be used to provide for the loss of redundancy in this system. The provisions of Specification 3.0.3 and 3.0.4 are not applicable.
- b. With the fire suppression water system otherwise inoperable:
  - Establish a backup fire suppression water system within 24 hours, and
  - Submit a Special Report in accordance with Specification 6.9.2;
    - a) By telephone within 24 hours,
    - b) Confirm by telegraph, mailgram, or facsimile transmission no later than the first working day following the event, and

CRYSTAL RIVER - UNIT 3

# LIMITING CONDITION FOR OPERATION (Cont'd)

c) In writing within 14 days following the event, outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

#### SURVEILLANCE REQUIREMENTS

4.7.11.1 The fire suppression water system shall be demonstrated OPERABLE:

- a. At least once per 7 days by verifying the contained water supply volume.
- b. At least once per 31 days on a STAGGERED TEST BASIS by starting each pump and operating it for at least 15 minutes on recirculation flow.
- c. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path is in its correct position.
- d. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- e. At least once per 18 months by performing a system functional test which includes simulated automatic actuation of the system throughout its operating sequence, and:
  - Verifying that each automatic valve in the flow path actuates to its correct position.
  - Verifying that each pump develops at least 2000 gpm at a discharge pressure of > 115 psig.
  - Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel, and
  - Verifying that each high pressure pump starts (sequentially) to maintain the fire suppression water system pressure > 70 psig.
- f. At least once per 3 years by performing flow tests of the system in accordance with Chapter 5, Section 11 of Fire Protection Handbook, 14th Edition (January 1976) published by National Fire Protection Association.

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SURVEILLANCE REQUIREMENTS (Cont.)

- q. By demonstrating the fire pump diesel engines OPERABLE:
  - 1. At least once per 31 days by verifying:
    - (a) The fuel storage tank contains at least 175 gallons of fuel, and
    - (b) The diesel starts from ambient conditions and operates for at least 20 minutes.
  - 2. At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank, obtained in accordance with ASTM-D270-65, is within the acceptable limits specified in Table 1 of ASTM-D975-74 with respect to viscosity, water content and sediment for the type of fuel specified for use in the diesels.
  - 3. At least once per 18 months, during shutdown, by:
    - (a) Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for the class of service, and
    - (b) Verifying the diesel starts from ambient conditions on the auto-start signal and operates for > 20 minutes while loaded with the fire pump.
- h. By demonstrating the fire pump diesel starting 24-volt battery banks and chargers OPERABLE:
  - 1. At least once per 7 days by verifying that:
    - (a) The electrolyte level of each battery is above the plates, and
    - (b) The overall battery voltage is > 24 volts.
  - At least once per 92 days by verifying that the specific gravity is appropriate for continued service of the battery.
  - 3. At least once per 18 months by verifying that:
    - (a) The batteries, cell plates and battery racks show no visual indication of physical damage or abnormal deterioration, and
    - (b) The battery-to-battery and terminal connections are clean, tight, free of corrosion and coated with anti-corrosion material.

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#### DELUGE AND SPRINKLER SYSTEMS

#### LIMITING CONDITION FOR OPERATION

3.7.11.2 The deluge and sprinkler systems shown in Table 3.7-4 shall be OPERABLE.

APPLICABILITY: Whenever equipment in the deluge/sprinkler protected areas is required to be OPERABLE.

ACTION:

- a. With one or more of the above required deluge and sprinkler systems inoperable, establish a continuous fire watch with backup fire suppression equipment for the unprotected area(s) within 1 hour; restore the system to OPERABLE status within 14 days or, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.5.2 within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specification 3.0.3 and 3.0.4 are not applicable.

#### SURVEILLANCE REQUIREMENTS

4.7.11.2 Each of the above required deluge and sprinkler systems shall be demonstrated OPERABLE:

- a. At least or e per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- b. At least once per 18 months:
  - By performing a system functional test which includes simulated automatic actuation of the system, and:
    - Verifying that the automatic valves in the flow path actuate to their correct positions.

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## SURVEILLANCE REQUIREMENTS (Continued)

- b) Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel.
- 2. By inspection of the spray headers to verify their integrity, and
- 3. By inspection of each nozzle to verify no blockage.
- At least once per 3 years by performing an air flow test through с. each open head spray/sprinkler header and verifying each open head spray/sprinkler nozzle is unobstructed.

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## TABLE 3.7-4

## GELUGE AND SPRINKLER SYSTEMS

## SYSTEM AHFL-1 Deluge System 1. AHFL-2A Deluge System 2. 3. AHFL-2B Deluge System AHFL-2C Deluge System 4. 5. AHFL-2D Deluge System 6. AHFL-4A Deluge System AHFL-48 Deluge System 7. AHFL-15 Deluge System 8. 9. Emergency Diesels Deluge

## LOCATION

Auxiliary Building, Elevation 143'0", Zone 11 (Main Filter Exhaust Room) Auxiliary Building, Elevation 143'0", Zone 11 (Main Filter Exhaust Room) Auxiliary Building, Elevation 143')", Zone 11 (Main Filter Exhaust Roo Auxiliary Building, Elevation 143'0", Zone 11 (Main Filter Exhaust Room) Auxiliary Building, Elevation 164'0", Zone 5 (Main Filter Exhaust Room) Control Complex, Elevation 164'0", Zone 5 (HVAC Emergency Equipment 3A) Control Complex, Elevation 164'0", Zone 4 (HVAC Emergency Equipment 3B) Auxiliary Building, Elevation 95'0", Zone 34 (Nuclear Sampling Room) Auxiliary Building, Elevation 119'0", Zones 27 and 28

CRYSTAL RIVER

- UNIT

w

#### HALON SYSTEM

#### LIMITING CONDITION FOR OPERATION

3.7.11.3 The Halon system in the Cable Spreading room (Control Complex, Elevation 134'0") shall be OPERABLE with the storage tanks having at least 95% of full charge weight and 90% of full charge pressure.

APPLICABILITY: At all times

ACTION:

- a. With one or more of the above required Halon systems inoperable, establish a continuous fire watch with backup fire suppression equipment for the unprotected area(s) within 1 hour; restore the system to OPERABLE status within 14 days or, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.11.3 The Halon system shall be demonstrated OPERABLE:

- a. At least once per 6 months by verifying each Halon storage tank weight and pressure.
- b. At least once per 18 months by
  - Verifying the sistem, including associated ventilation dampers, would actuate automatically to a simulated test signal.
  - Verifying the OPERABILITY of the manual initiating system.
  - Performance of a flow test through headers and nozzles to assure no blockage.

ICRYSTAL RIVER - UNIT 3

FIRE HOSE STATIONS

#### LIMITING CONDITIONS FOR OPERATION

3.7.11.4 The fire hose stations shown in Table 3.7-5 shall be OPERABLE.

APPLICABILITY: Whenever equipment in the areas protected by the fire hose stations is required to be OPERABLE.

ACTION:

- a. With one or more the fire hose stations shown in Table 3.7-5 inoperable, route an additional equivalent capacity fire hose to the unprotected area(s) from an OPERABLE hose station within 1 hour.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.11.4 Each of the fire hose stations shown in Table 3.7-5 shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
  - 1. Visual inspection of the station to assure all required equipment is at the station, and
- b. At least once per 18 months by:
  - 1. Removing the hose for inspection and re-racking, and
  - 2. Replacement of all degraded gaskets in couplings.
- c. At least once per 3 years by:
  - Partially opening each hose station valve to verify valve OPERABILITY and no flow blockage.
  - Conducting a hose hydrostatic test at a pressure at least 50 psig greater than the maximum pressure available at that hose station.

CRYSTAL RIVER UNIT 3

# TABLE 3.7-5

## FIRE HOSE STATIONS

Hose	Reel	Location	Hose Reel Valve No.
1.	Cont	rol Complex	
	a.	Elevation 134'	
		1. Zone 4 (Entrance to Cable Spreading Room)	FSV-253
2.	Turb	ine Building	
	а.	Elevation 145	
		1. Entrance to Control Complex	FSV-155
3.	Inte	rmediate Building	
	a.	Elevation 95'	
		<ol> <li>Zone 3 (Steam Driven Emergency Feedwater Pump)</li> </ol>	FSV-170
	b.	Elevation 119'	
		1. Zone 2 (Reactor Building Industrial Cooler	FSV-169
		2. Zone 5 (Containment Personnel Airlock)	FSV-134
4.	Auxi	liary Building	
	a.	Elevation 95'	
		<ol> <li>Zone 1 (Corridor outside Chem-Rad Area)</li> <li>Zone 5 (ES MCC 3A1)</li> <li>Zone 13 (Elevitor)</li> <li>Zone 17 (Nuclear Services Sea Water Pumps)</li> </ol>	FSV-135 FSV-143 FSV-138 FSV-139
	b.	Elevation 119'	
		<ol> <li>Zone 18 (Elevator)</li> <li>Zone 23 (Es MCC 3 A B)</li> <li>Zone 26 (Waste Compactor)</li> </ol>	FSV-137 FSV-142 FSV-140
	٢.	Elevation 143'	
		1. Zone 9 (Entrance to Charcoal Filter Room)	FSV-131
	d.	Elevation 162'	
		<ol> <li>Zone 1 (North of Spent Fuel Pools)</li> <li>Zone 3 (Elevator)</li> </ol>	FSV-136 FSV-133

#### 3/4.7.12 PENETRATION FIRE BARRIERS

#### LIMITING CONDITIONS FOR OPERATION

3.7.12 All penetration fire barriers protecting safety related areas shall be functional.

APPLICABILITY: At all times.

ACTION:

- a. With one or more of the above required penetration fire barriers non-functional, establish a continuous fire watch on at least one side of the affected penetration within 1 hour.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.12 Each of the above required penetration fire barriers shall be verified to be functional by a visual inspection;

- a. At least once per 18 months, and
- Prior to declaring a penetration fire barrier functional following repairs or maintenance.

CRYSTAL RIVER - UNIT 3

## **B/4.3 INSTRUMENTATION**

BASES

## REMOTE SHUTDOWN INSTRUMENTATION (Continued)

HOT STANDBY of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criterion 19 of Appendix "A", 10 CFP 50.

#### 3/4.3.3.6 POST-ACCIDENT INSTRUMENTATION

The OPERABILITY of the post-accident instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water Cooled Nuclear Power Plants to assess Plant Conditions During and Following an Accident", December 1975.

## 3/4.3.3.7 FIRE DETECTION INSTRUMENTATION

The OPERABILITY of the fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required in order to detect and locate fires in their early stages. Prompt detection of fires will reduce the potential for damage to safety related equipment and is an integral element in the overall facility fire protection program.

In the event that a portion of the fire detection instrumentation is inoperable, the establishment of frequent fire patrols in the affected areas is required to provide detection capability until the inoperable instrumentation is returned to service.

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BASES

#### 3/4.7.10 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values.

## 3.4.7.11 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, deluge and sprinklers, hose stations and Halon. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the affected equipment can be restored to service.

In the event that the fire suppression water system becomes inoperable, immediate corrective measures must be taken since this system provides the major fire suppression capability of the plant. The requirement for a twenty-four hour report of the Commission provides for prompt evaluation of the acceptability of the corrective measures to provide adequate fire suppression capability for the continued protection of the nuclear plant.

#### 3/4.7.12 PENETRATION FIRE BARRIERS

The functional integirty of the penetration fire barriers ensures that fires will be confined or adequately retarded from spreading to adjacent portions of the facility. This design feature minimizes the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. The penetration fire barriers are a passive element in the facility fire protection program and are subject to periodic inspection.

During periods of time when the barriers are not functional, a fire watch patrol is required to be maintained in the vicinity of the affected barrier until the barrier is restored to functional status.

CRYSTALRIVER - UNIT 3

B 3/4 7-6

Amendment No.

#### 6.1 RESPONSIBILITY

6.1.1 The Nuclear Plant Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Nuclear Plant Manager shall be responsible for an annual fire protection inspection which shall be performed utilizing either qualified offsite licensee personnel or an outside fire protection firm. The inspection shall consist of: a) an inspection of safety-related areas of the Plant to verify that they are in conformance with the fire hazards analysis; and b) a review of the Fire Brigade organization, training, and drills to verify their conformance with the requirements of Section 27 of the NFPA Code-1976.

6.1.3 The Nuclear Plant Manager shall be responsible for an inspection of the fire protection program to be performed by a qualified outside fire consultant at least once per 36 months.

#### 6.2 ORGANIZATION

#### OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

#### FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figure 6.2-2 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. All CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. A Fire Brigade of at least 5 members shall be maintained onsite at all times. This excludes 5 members of the minimum shift crew necessary for safe shutdown of the plant and personnel required for other essential functions.

CRYSTAL RIVER - UNIT 3

6-1

Amendment No. S,



Fig 6 2 - 1



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FIGURE 6.2-2

## 6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Radiation Protection Engineer who shall meet or exceed the qualifications of Regulatory Guide 1.8, September, 1975.

## 6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Assistant Nuclear Plant Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Nuclear Plant Manager and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976.

## 6.5 REVIEW AND AUDIT

6.5.1 PLANT REVIEW COMMITTEE (PRC)

FUNCTION

6.5.1.1 The Plant Review Committee shall function to advise the Nuclear Plant Manager on all matters related to nuclear safety.

## COMPOSITION

6.5.1.2 The Plant Review Committee shall be composed of the:

Chairman:	Assistant Nuclear Flant Manager
Member:	Operations Supervisor
Member:	Technical Support Engineer
Member:	Maintenance Engineer
Member:	Chemistry and Radiation Protection Engineer

## ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PRC Chairman to serve on a temporary basis; no more than two alternates shall participate as voting members in PRC activities at any one time.

## MEETING FREQUENCY

6.5.1.4 The PRC shall meet at least once per cilendar month and as convened by the PRC Chariman or his designated alternate.

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Amendment No. 5,

## REVIEW (Continued)

- g. Events requiring 24 hour written notification to the Commission.
- All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems, or components.
- i. Reports and meetings minutes of the Plant Review Committee.

## AUDITS

6.5.2.9 Audits of facility activities shall be performed under the cognizance of the NGRC. These audits shall encompass:

- a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Facility Emergency Plan and implementing procedures at least once per 24 months.
- f. The Facility Security Plan and implementing procedures at least once per 24 months.
- g. The facility fire protection program and implementing procedures at least once per 24 months.
- Any other area of facility operation considered appropriate by the NRGC or the Senior Vice President Engineering and Construction.

## AUTHORITY

6.5.2.10 The NGRC shall report to and advise the Senior Vice President-Engineering and Construction on those areas of responsibility specified in Sections 6.5.2.8 and 6.5.2.9.

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## 6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT STANDBY within one hour.
- b. The Safety Limit violation shall be reported to the Commission, the Director-Power Production and to the NGRC within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PRC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the NRGC and the Director-Power Production within 14 days of the violation.

## 6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed by the PRC and approved by the Nuclear Plant Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

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occurrence of the event. The written report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the technical specifications but which do not prevent the fulfillment of the functional requirements of affected systems.
- b. Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shutdown required by a limiting condition for operation.
- c. Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in reactor protection systems or engineered safety feature systems.
- d. Abnormal degradation of systems other than those specified in 6.9.1.8.c above, designed to contain radioactive material resulting from the fission process.

## SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Director of the Office of Inspection and Enforcement, Region II, within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. ECCS Actuation, Specification 3.5.2 and 3.5.3.
- Inoperable Seismic Monitoring Instrumentation, Specification 3.3.3.3.
- Inoperable Meteorological Monitoring Instrumentation, Specification 3.3.3.4.
- d. Seismic event analysis, Specification 4.3.3.3.2.
- Inoperable Fire Detection Monitoring Instrumentation, Specification 3.3.3.7.
- f. Inoperable Fire Suppression System, Specifications 3.7.11.1, 3.7.11.2, 3.7.11.3, and 3.7.11.4.

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