



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

November 9, 1989

Docket No. 50-302

Mr. W. S. Wilgus
Vice President, Nuclear Operations
Florida Power Corporation
ATTN: Manager, Nuclear Operations
Licensing
P. O. Box 219-NA-21
Crystal River, Florida 32629

Dear Mr. Wilgus:

SUBJECT: CRYSTAL RIVER UNIT 3 - FLOODING CONSIDERATIONS IN "PIPE RUPTURE ANALYSIS CRITERIA OUTSIDE THE REACTOR BUILDING" (IMPELL REPORT) (TAC NO. 69533)

Further review of the subject Impell Report has identified a significant omission in your program to bring Crystal River Unit 3 (CR-3) into conformance with GDC-4. CR-3 is currently operating under an exemption to GDC-4 with respect to the environmental and dynamic effects of high energy line breaks (HELB) until the end of Refuel 7.

In Section 9.0 of the Impell Report, Evaluation of Flooding Effects, it is indicated that the impact of the effects of flooding will be evaluated as part of the Individual Plant Examination (IPE) requested by Generic Letter 88-20, Individual Plant Examination for Severe Accident Vulnerabilities, dated November 23, 1988. This statement is not acceptable in that this would result in failure to ensure compliance with design basis flooding requirements as a result of postulated pipe breaks as part of the current reevaluation. Thus, once the reevaluation is complete, required compliance with GDC-4 for flooding could not be ensured. Further, to defer a design basis flooding analysis to the IPE which consists of a probabilistic evaluation and deals with severe accident vulnerabilities, i.e. beyond design basis concerns, is inappropriate under the current circumstances where the adequacy of existing design basis pipe rupture flooding protection in accordance with GDC-4 is in question.

Consequently, as part of the current HELB program, you must include an analysis of flooding effects on equipment required to safely shut down the plant following design basis pipe breaks. This analysis should confirm that required equipment, including new targets added over the years since the initial licensing pipe break evaluation, are properly protected from the bounding flood level in individual plant areas resulting from the most limiting postulated design basis pipe rupture in those areas.

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Mr. W. S. Wilgus

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The above concern was discussed with your representatives in a conference call on November 7, 1989, at which time they acknowledged the staff position and indicated that the subject report would be modified to address flooding protection.

Sincerely,

Original signed by

Harley Silver, Project Manager
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc:
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Mr. W. S. Wilgus
Florida Power Corporation

Crystal River Unit No. 3 Nuclear
Generating Plant

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