

**Florida
Power**
CORPORATION

October 31, 1989
3F1089-25

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Technical Specification Change Request No. 177

Dear Sir:

Florida Power Corporation (FPC) hereby submits Technical Specification Change Request No. 177 requesting amendment to Appendix A of Operating License No. DPR-72. As part of this request, the proposed replacement pages for Appendix A and associated bases are provided.

This submittal proposes the deletion of the 3.25 limit from Specification 4.0.2. This is proposed in accordance with the guidance provided in Generic Letter 89-14, "Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals".

FPC requests this amendment be implemented within 30 days after issuance to allow for procedure revisions and training.

Sincerely,

Gary Boldt, Vice President
Nuclear Production

GB:DGG:wla
Attachment

xc: Regional Administrator, Region II
Senior Resident Inspector

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER)
)
FLORIDA POWER CORPORATION) DOCKET NO. 50-302

CERTIFICATE OF SERVICE

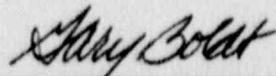
Gary Boldt deposes and says that the following has been served on the Designated State Representative and Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,
Board of County Commissioners
of Citrus County
Citrus County Courthouse
Inverness, FL 32650

Administrator
Radiological Health Services
Department of Health and
Rehabilitative Services
1323 Winewood Blvd.
Tallahassee, FL 32301

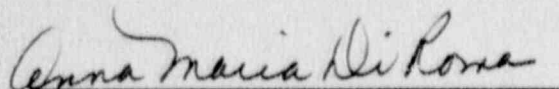
A copy of Technical Specification Change Request No. 177, requesting Amendment to Appendix A of Operating Licensing No. DPR-72.

FLORIDA POWER CORPORATION



Gary Boldt, Vice President
Nuclear Production

SWORN TO AND SUBSCRIBED BEFORE ME THIS 31st DAY OF OCTOBER, 1989.


Notary Public

Notary Public, State of Florida at Large
My Commission Expires: 10/19/92

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES OCT. 19, 1992
BONDED THROUGH ASHTON AGENCY INC

STATE OF FLORIDA
COUNTY OF CITRUS

Gary Boldt states that he is the Vice President, Nuclear Production for Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.

Gary Boldt

Gary Boldt, Vice President
Nuclear Production

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 31st day of October, 1989.

Anna Maria Di Roma

Notary Public

Notary Public, State of Florida at Large
My Commission Expires: 10/19/92
NOTARY PUBLIC, STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES OCT. 19, 1992
BONDED THROUGH ASHTON AGENCY INC

**FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72
REQUEST NO. 177, REVISION 0
SPECIFICATION 4.0.2.b DELETION**

LICENSE DOCUMENT INVOLVED: Technical Specification

PORTIONS: 4.0.2.b

DESCRIPTION OF REQUEST:

This submittal requests the deletion of Specification 4.0.2.b from Technical Specifications.

REASON FOR REQUEST:

Specification 4.0.2 of the Technical Specifications permits surveillance intervals to be extended up to 25 percent of the specified interval. This extension facilitates the scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not suitable for conducting a surveillance, for example, under transient conditions or other ongoing surveillance or maintenance activities. Part b. of this specification also limits extending surveillances so that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent.

In a literal application of Specification 4.0.2.b, time spent in refueling outages is neglected. As a result, normal surveillance intervals end up being shortened to ensure compliance. Refueling interval surveillances, for example, have ended up being reduced from 18 months to 12 months. This was due to the inclusion, in the surveillance due date calculation, of 6 months worth of refueling/maintenance outages that occurred within the previous 2 consecutive test intervals. This practice has in the past caused Florida Power Corporation and NRC resources to be expended on processing requests for one-time exceptions for the performance of affected surveillances. As a result, the deletion of Specification 4.0.2.b is requested. This is being done in accordance with NRC Generic Letter 89-14 (Removal of the 3.25 Limit on Extending Surveillance Intervals).

EVALUATION OF REQUEST:

Experience has shown that surveillance intervals, with provisions to extend them by 25 percent are usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has granted requests for one time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, it has been concluded the 3.25 limitation on extending surveillances is not a practical limit on the use of the 25 percent allowance for extending surveillances that are performed on a refueling outage basis.

The use of the allowance to extend surveillance intervals by 25 percent can result in a significant safety benefit for surveillances that are performed on

a routine basis during plant operation. This safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the surveillance. Examples of this include transient plant operating conditions or conditions in which safety systems are out of service because of ongoing surveillance or maintenance activities. In such cases, the safety benefit of allowing the use of the 25 percent allowance to extend a surveillance interval would outweigh any benefit derived by limiting three consecutive intervals to the 3.25 limit. Additionally, there is the administrative and logistic burden associated with tracking the use of the 25 percent allowance to ensure compliance with the 3.25 limit. On the basis of these considerations, it is concluded that removal of the 3.25 limit will have an overall positive impact on safety.

SHOLLY EVALUATION:

Florida Power Corporation (FPC) proposes that this change does not involve a significant hazards consideration. The deletion of the 3.25 limit on extending surveillances has no negative impact on plant operation or safety. The use of the allowance to extend surveillance intervals by 25 percent results in a significant safety benefit when the surveillance is extended at times when conditions are not suitable for performing the surveillance. In these cases, the safety benefit of allowing the use of the 25 percent extension would outweigh any benefit derived by limiting three consecutive intervals to the 3.25 limit.

Based on the above, FPC finds that the change will not:

1. Involve a significant increase in the probability or consequence of an accident previously evaluated because the deletion of the 3.25 limitation recognizes that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. Therefore, accident analysis assumptions reflected in these Surveillance Requirements will still be verified on a frequency sufficient to ensure that the assumptions are reliably maintained.
2. Create the possibility of a new or different kind of accident previously evaluated because the proposed change introduces no new mode of plant operation nor does it require physical modification to the plant. Additionally, the surveillance interval will still be constrained by the 25 percent extension criteria of Specification 4.0.2.
3. Involve a significant reduction in the margin of safety. Any reduction in the margin of safety will be insignificant and offset by the safety benefit gained by allowing the surveillance to be extended at times when conditions are not suitable for performing the surveillance and by not forcing the plant through a shutdown transient to perform refueling interval surveillances.