Florida Power
CORPORATION

September 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

In Re: Florida Power Corporation
Crystal River Unit #3
Docket No. 50-302

Dear Mr. Stolz:

On April 14, 1976, Florida Power Corporation discovered that the reactor building dome at Crystal River Unit #3 had undergone a delamination. Extensive evaluations have resulted in the initiation of repairs to the dome.

On June 11, 1976, Florida Power Corporation submitted to the Nuclear Regulatory Commission a report, Reactor Building Dome Delamination, Florida Power Corporation Crystal River Unit 3. The report included relevant background information, results of subsequent tests and evaluations and a description of corrective action to be taken. Subsequently, Florida Power Corporation and its representatives met with Nuclear Regulatory Commission staff and reviewed the report and the anticipated repair activities. The staff has provided valuable commentary and our dialogue is continuing on the subject.

The dome repair efforts are proceeding in accord with the attached schedule for completion on November 15, 1976. We will delay performance of the Structural Integrity Test and Type A Integrated Leak Rate Test until such time as the dome repair is completed. During the remaining work time, we will continue with balance-of-plant activities in order to effect the eventual start-up of the unit. There are, of course, large economic penalties associated

with the delayed start-up. We will continue the balance-of-plant start-up activities through fuel loading in parallel with the dome repair.

Appendix J, 10CFR50 and Regulatory Guide 1.68 generally stipulate completion of the Structural Integrity Test and Integrated Leak Rate Test as a prerequisite for an operating license. Under our particular circumstances there is sufficient cost-benefit opportunity without affecting safety to compel us to make this request for the early fuel loading date.

We have reviewed the safety analyses in the FSAR and concluded that no safety problems would exist or be created by loading fuel prior to having performed the Structural Integrity and Integrated Leak Rate Tests. There would be, of course, no fission products or activation products present in the new fuel or primary coolant to constitute a significant radiation hazard. The only radiation source involved would be the two Americium-Berylium-Curium start-up sources which are and would remain insignificant as far as posing any threat to the health and safety of the public. In addition, there are no credible mechanisms which would cause any power transients to occur. Under all normally postulated accident conditions, required shutdown margins would exist.

We also have determined that there would be no safety problems associated with the reactor during a time interval between completion of fuel loading, completion of the dome repair and subsequent reactor building testing. This situation would in fact not be different from those which will be encountered during each future periodic Type A Leak Rate and during extended plant outages except that, to this request's further advantage, no fission products or activation products will be present in the new fuel to pose a radiation hazard to anyone.

We request that you issue to Florida Power Corporation on or about 11/1/76 a Facility Operating License for its Crystal River Unit #3 Nuclear Plant subject to the following restrictions to be applicable until NRC acceptance of the Structural Integrity Test results and completion of the Type A Integrated Leak Rate Test:

(1) Maximum Power Level -

The licensee is authorized to load fuel and perform subcritical tests, but at no time shall the reactor be made critical following fuel loading.

(2) Technical Specificatons

The Technical Specifications are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications except as noted below:

(a) The reactor shall not be operated in any mode other than Mode 5 or 6 as specified in Technical Specification Table 1.1 (Appendix A).

We realize that the above request involves a deviation from normally prescribed programs, however, the requested course of action would in no way endanger the health and safety of the public or on-site personnel. In view of the benefits to our customers to be derived from this procedure, your granting this license is on this schedule concluded to be in the public interest as well as that of our owner participants.

We would appreciate an opportunity to further discuss this very important matter at your earliest convenience to assure time for your evaluation and response on the scheduled date.

Sincerely,

J. T. Rodgers

J. T. Rodgers
Asst. Vice President

JTR/iw

CRYSTAL RIVER #3
NUCLEAR STATION
SCHEDULE 9/14/76