

MAR 24 1976

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Docket No. 50-302

Florida Power Corporation
 ATTN: Mr. J. T. Rodgers
 Assistant Vice President and
 Nuclear Project Manager
 P. O. Box 14042
 St. Petersburg, Florida 33733

Gentlemen:

In your letter, dated March 19, 1976, you requested that we provide the Florida Power Corporation (FPC) with our response to the question: "In accordance with Regulatory Guide 1.20 and/or 1.68, can Hot Functional Tests occur acceptably with only three of the four Primary Coolant Pumps in operation?"

It is the staff's position that Hot Functional Tests for Crystal River, Unit 3 be conducted with all four Reactor Coolant Pumps (RCP) in operation.

You have committed to performing these pre-operational tests in accordance with Regulatory Guides 1.20 and 1.68 as stated in your Final Safety Analysis Report for CR-3.

Position D.1 of NRC Regulatory Guide 1.20 states, "reactor internals important to safety should be subjected during the pre-operational functional testing program to all significant flow modes of normal reactor operation and under the same test conditions imposed on the prototype design whose vibration analysis and tests have been accepted and approved."

Accordingly, our position is that all four RCP's must be utilized in various combinations of flow modes of operation and transients to assure that all critical reactor internals are subjected to the most severe forcing functions that could occur during all modes of reactor operations.

Sincerely,

Original Signed by

W. R. Butler

Walter R. Butler, Chief
 Light Water Reactors Branch No. 4

Division of Project Management
 LWR #4
 WRButler

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SURNAME →	L Engle See next page	JKnight	WRButler
DATE →	3/24/76	3/24/76	3/24/76

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Florida Power Corporation

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cc: Mr. S. A. Brandimore
Vice President and General Counsel
P. O. Box 14042
St. Petersburg, Florida 33733

OFFICE →						
SURNAME →						
DATE →						