

**Florida  
Power**  
CORPORATION

April 3, 1981  
File: 3-0-3-e  
#3-041-07

Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Subject: Crystal River Unit 3  
Docket No. 50-302  
Facility Operating License No. DPR-72  
Snubber Surveillance Technical Specifications

Dear Mr. Eisenhut:

In your letter of November 20, 1980, (received December 4, 1980), you requested Florida Power to propose a change to the Crystal River Unit 3 Technical Specifications within 120 days (i.e. April 3, 1981) with regard to safety related hydraulic and mechanical snubbers. Florida Power has been actively reviewing this change and its impact(s) on Crystal River Unit 3 (CR-3). Our review to date has not identified a need to change current surveillance practices to the extent requested. However, we intend to continue our review further until we can adequately address the concerns identified below.

Among the points we wish to consider further are:

- 1) What is meant by "...recent operating experience" and how does it affect the adequacy of the current CR-3 Surveillance Program?
- 2) How does this portion of Revision 4 of the B & W Standard Technical Specifications (STS) compare with the STS's (Revision 1) utilized in developing the CR-3 Technical Specifications and ANSI/ASME OM-4 (Draft)?
- 3) Should the Staff request piecemeal adoption of portions of Revision 4 of (STS) when we have been led to believe that piecemeal adoption of portions is unacceptable, based on the premise that each STS revision maintains a certain level of safety.
- 4) Are certain aspects of the Revision 4 STS in this area going beyond typical Technical Specification Scope (e.g. required "second level" review in 4.7.9(f)) and is such warranted?

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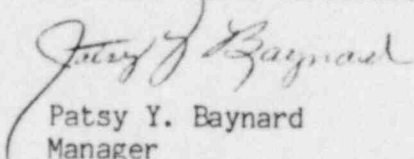
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Additionally, FPC is currently pursuing several areas related to "Service Life" of which the Staff is aware (Versilube F-50 characteristics after long-term exposure, BUNA-N seals, etc). It would appear imprudent to also change license obligations with regard to surveillance when so many "special studies" are underway.

We welcome Staff input on items 1 through 4 above and propose to submit any Technical Specification Change Request resulting from our reviews by June 1, 1981. Your cooperation in this matter will be appreciated.

Very truly yours,

FLORIDA POWER CORPORATION



Patsy Y. Baynard  
Manager  
Nuclear Support Services

SNUBKW/mlg