



December 31, 1980

File: 3-0-17
3-120-40

Director
Office of Nuclear Reactor Regulation
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Technical Specification Change Request No. 62

Dear Sir:

In our Change Request No. 62, we asked that all Nonradiological Environmental Technical Specifications be deleted from Appendix B to our Operating License. The request was based on the premise that this area was adequately and appropriately regulated by the U.S. Environmental Protection Agency's National Pollutant Discharge Elimination System (NPDES) Permit and the State of Florida's Department of Environmental Regulation Permit.

Because of this and the fact that an EPA study may conflict with the present study being performed for the Environmental Technical Specifications, it is again requested that Section 3.1 of Appendix B to our Operating License be deleted. This will preclude any conflicting interface between the studies required by the two agencies and will allow Florida Power Corporation to more appropriately address the issue of environmental impact.

In the alternative, a suspension of the requirements of Section 3.1 for one (1) year (from April 1, 1981 to March 31, 1982) would allow FPC to prepare a statement on the stabilization of the ecosystem. It is reasonable to assume that no catastrophic change will occur due to operation at the Crystal River site during this suspension of the studies since none has occurred during the four years of monitoring to date.

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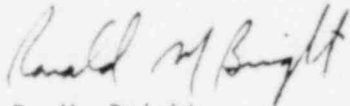
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As contracts for the fifth year of monitoring (to begin April 1, 1981) must be awarded soon if the studies must continue, a most expeditious review of this request would be appreciated. If further discussion is desired, please contact this office.

Very truly yours,

FLORIDA POWER CORPORATION

A handwritten signature in cursive script, appearing to read "R. M. Bright".

R. M. Bright
Acting Manager
Nuclear Support Services

Bright(T01)D1A-2