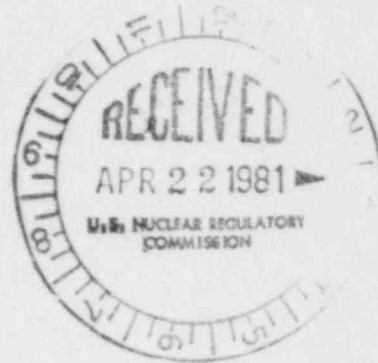


**Florida  
Power**  
CORPORATION

April 15, 1981  
File: 3-0-3-a-3  
#3-041-15



Mr. John F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Stolz:

Subject: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
Continued Operation with Inoperable MSV-414

Dear Mr. Stolz:

Florida Power Corporation hereby requests an exception to the Crystal River Unit 3 Technical Specifications to allow operation with one main steam isolation valve inoperable. The request involves entrance into all applicable modes where operation with one inoperable containment isolation valve is allowed.

Main steam isolation valve MSV-414 has been declared inoperable due to a damaged actuator. Currently, the actuator has been removed and the valve is gagged. The unit remains in Mode 4 until your approval can be obtained to return to power operations (i.e., Mode 1) with MSV-414 deactivated. Repair or replacement of the actuator could require in excess of fourteen (14) weeks.

MSV-414 is among the many valves required to be operable in Modes 1, 2, 3, and 4 per Technical Specification 3.6.3.1. Continued Mode 1 operation is allowed in accordance with Action Statement b provided the affected penetration is isolated by deactivating the automatic valve in the isolation position. This specification has been rigidly interpreted to disallow ascension in modes (i.e., Mode 4 to Mode 3, etc.). However, Technical Specification 3.7.1.5 does not require the main steam isolation valves to be operable in Modes 4, 5, and 6 and does allow ascension in modes to power operation provided the inoperable valve is maintained closed. Therefore, we request a temporary exception to Technical Specification 3.6.3.1 to make the Limiting Condition for Operation consistent with that of Technical Specification 3.7.1.5. This exception would allow up to Mode 1 operation with the main steam isolation valve maintained

8104230412

P

A001  
3  
1/0  
w/attach:

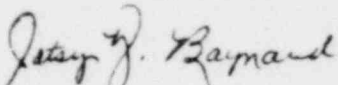
Mr. John F. Stolz  
Page 2  
April 15, 1981

closed until the next refueling outage at which time, the inoperable valve could be restored to operable status. In accordance with applicable Surveillance Requirements the remaining isolation valves will be verified as operable prior to ascending modes and a visual inspection of the operable actuators and snubbers will be performed to assess the potential for a common mode failure.

The limitations of power operation with one main steam isolation valve maintained closed have been previously reviewed internally, and reactor operation limited to 60% Full Power does not cause degradation of protective instrumentation functions. Under these circumstances, control system load limits are reset to cause balancing of feedwater flow and steam flow.

Pursuant to 10 CFR 170.12, we have determined this issue to involve a single safety issue and your review to be a Class III amendment. Therefore, a check in the amount of \$4,000 is hereby remitted. This amendment fee will also apply to a future technical specification change which will address the generic issues of discrepancies between technical specifications and mode ascension under an action statement.

Very truly yours,



P. Y. Baynard  
Manager  
Nuclear Support Services

PYB:mm