Florida Power
CORPORATION

June 30, 1981
File: 3-F-2

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

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U.S. NUCLEAR REGULATORY COMMISSION

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Fire Protection Modifications - Reactor Coolant Pump Oil Collection System

References:
(1) Fire Protection Rule, NRC Generic Letter 81-12,to All Power Reactor Licensees with Plants Licensed Prior to January 1, 1979; Dated February 20, 1981.

(2) FPC Letter from Dr. P. Y. Baynard to Mr. Darrell G. Eisenhut, "Fire Protection Modifications"; Dated March 19, 1981.

(3) FPC Letter from Dr. P. Y. Baynard to Mr. Darrell G. Eisenhut, "Fire Protection Modifications - Reactor Coolant Pump Oil Collection System"; Dated June 12, 1981.

Dear Mr. Eisenhut:

By reference (1), you requested Florida Power Corporation to submit detailed information on meeting the requirements of Sections III.G, III.J, and III.O of Appendix R to 10 CFR 50. By reference (2), FPC petitioned the Commission for an extemption from retrofitting the existing Reactor Coolant Pump Oil Collection System on the basis that the existing Oil Collection System meets the objective of Section III.O and was previously approved by the NRC and implemented by FPC. Furthermore, FPC petitioned the Commission that the implementation schedule associated with this requirement be deferred idefinitely persuant to 10 CFR 50.48(c) (6) during the resolution of that petitioned exemption.

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Since May 11, 1981, several telephone conversations were held between NRC and FPC staff members regarding our requested exemption. The NRC staff has stated that the information previously submitted for the Fire Protection Safety Evaluation Report is either not available or insufficient in light of Appendix R requirements and has requested additional information. Furthermore, Mr. Tom Wambach of your staff has assured us that the implementation schedule associated with Section III.0 will be "tolled" indefinitely during the resolution of this exemption following FPC's commitment to provide additional information to complete the review. As a result of these conversations, FPC committed, by reference (3) to provide additional information related to the existing RCP C l Collection System.

Since the submittal of reference (3), telephone conversations on June 15, 1981 between Messers. Lobo and Telford of FPC and Mr. Tom Wambach of NRC were held regarding the adequacy of the existng Oil Collection System to comply with the requirements of Section III.0 of Appendix R. The following conclusions were reached:

1. During the 1981 Refueling Outage (scheduled for September 19, through December 4, 1981), FPC will visually inspect the existing RCP Oil Collection System for potential lube oil leakage sites and perform seismic evaluation of the as-built condition to determine the existing system's adequacy to comply with the Section III.0 of Appendix R; and

2(a). If the results of the visual inspection and seismic evaluation indicate that the existing system does meet the intent of Appendix R, the staff will be so notified; or

2(b). If the results of the visual inspection and seismic evaluation indicate that the existing system does not meet the intent of Section III.0 of Appendix R, FPC will either retrofit the existing Oil Collection System or design, fabricate and install a new Oil Collection System to meet the intent of Appendix R, Section III.0

FPC built the existing RCP Oil Collection System to meet the requirements delineated in the Branch Technical Position BTP PCSB 9.5-1, as reflected in the Staff's Fire Protection Safety Evaluation Report. 10 CFR 50, Appendix R, published in November, 1980, became effective on February 17, 1981. Since September, 1980, FPC has been operating the Crystal River Nuclear Plant at or near full power and has not experienced any outage to permit re-evaluation of the adequacy of the existing RCP Oil Collection System. The planned 1981 Refueling Outage will be the first opportunity FPC will have to perform an in depth evaluation of the adequacy of the existing system. During this outage, FPC will gather whatever data necessary to complete items 1 and 2 above.

To design and fabricate either a modified or a new Oil Collection System, FPC may require until July 1, 1982, as identified in the attached schedule. The modified or new Oil Collection System will be installed after July 1, 1982, during an outage of sufficient duration. Therefore, persuant to 10 CFR 50.12(a) and 10 CFR 50.48(c)(6), FPC hereby requests an extension to the implementation schedule identified in 10 CFR 50.48(c)(3). Any required modifications will be implementated before startup after the earliest of the following events commencing July 1, 1982:

(i) the first refueling outage, or

(ii) another planned outage that lasts for at least 60 days; or

(iii)an unplanned outage that lasts for at least 120 days.

Should you have any questions regarding our letter, please contact Walter G. Lobo at (813) 866-4422.

Very truly yours,

Patsy Y. Baynard

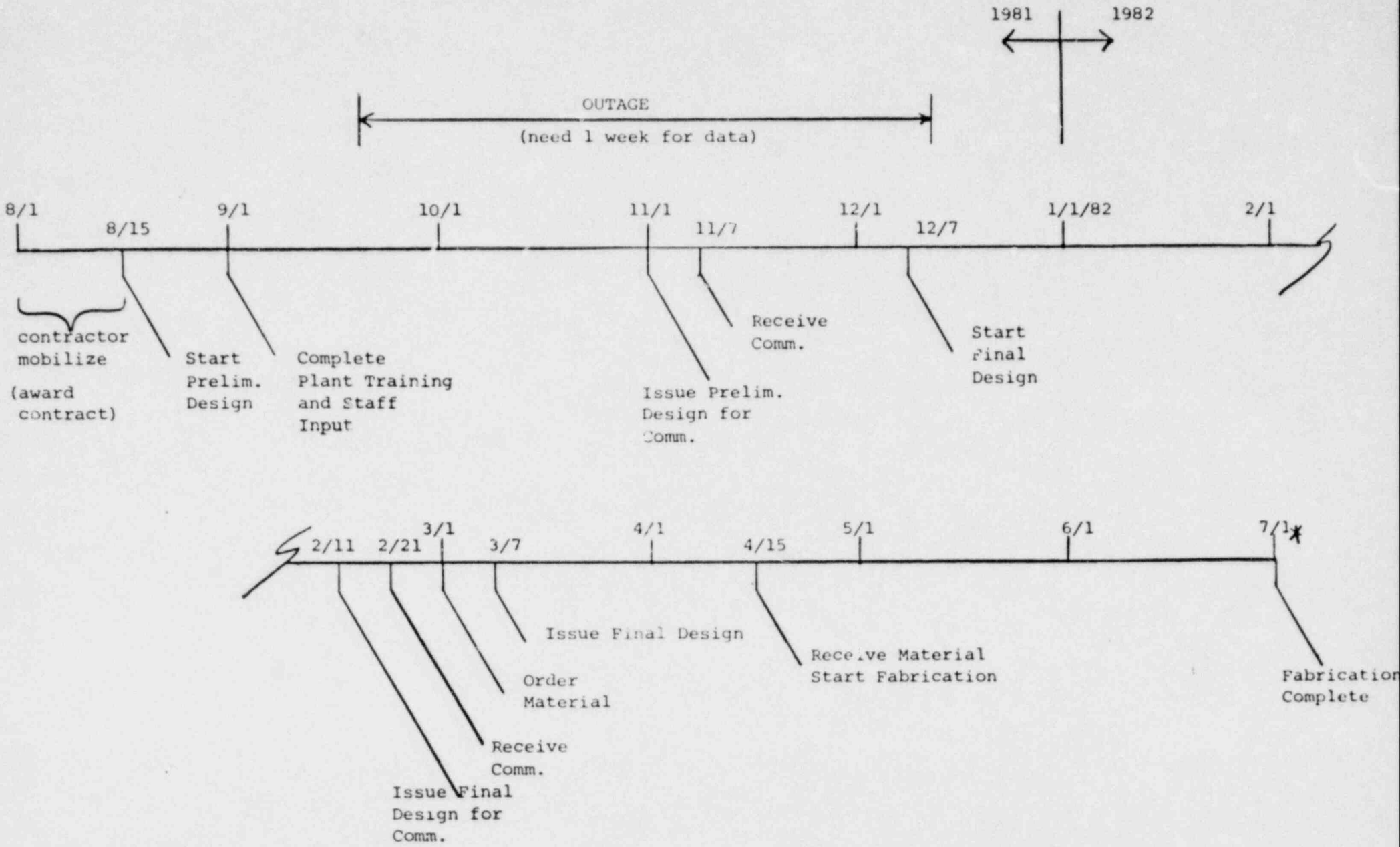
Dr. P. Y. Baynard
Manager,
Nuclear Support Services

Attachment

PYB/jw(NRCF. .)

ATTACHMENT

REACTOR COOLANT PUMP OIL COLLECTION PROJECT SCHEDULF



* Install during next available outage