

**Florida
Power**
CORPORATION

December 21, 1989
3F1289-16

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Technical Specification Change Request No. 176

Dear Sir:

Florida Power Corporation (FPC) hereby submits Technical Specification Change Request No. 176 requesting amendment to Appendix A of Operating License No. DPR-72. As part of this request, the proposed replacement pages for Appendix A are provided.

This submittal proposes the addition of integrating alarming dosimeters as an alternative for meeting the requirements for entry into a high radiation area.

FPC requests this amendment be implemented within 30 days after issuance to allow for procedure revisions and training.

Sincerely,

P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

PMB:REF:wla

xc: Regional Administrator, Region II
Senior Resident Inspector

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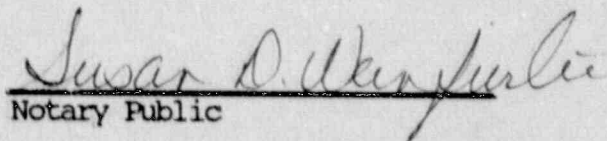
STATE OF FLORIDA
COUNTY OF CITRUS

P.M. Beard, Jr. states that he is the Senior Vice President, Nuclear Operations for Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.



P.M. Beard, Jr.
Senior Vice President
Nuclear Operations

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 21st day of December, 1989.



Susan D. Wainwright
Notary Public

Notary Public, State of Florida at Large
My Commission Expires:

NOTARY PUBLIC, STATE OF FLORIDA.
MY COMMISSION EXPIRES: AUG. 30, 1993.
BONDED THRU NOTARY PUBLIC UNDERWRITERS.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER)
) DOCKET NO. 50-302
FLORIDA POWER CORPORATION)

CERTIFICATE OF SERVICE

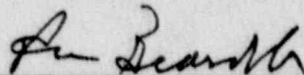
P.M. Beard, Jr. deposes and says that the following has been served on the Designated State Representative and Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,
Board of County Commissioners
of Citrus County
Citrus County Courthouse
Inverness, FL 32650

Administrator
Radiological Health Services
Department of Health and
Rehabilitative Services
1323 Winewood Blvd.
Tallahassee, FL 32301

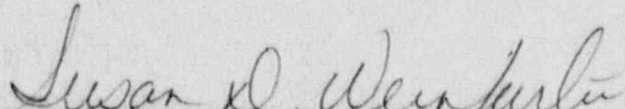
A copy of Technical Specification Change Request No. 176, requesting Amendment to Appendix A of Operating Licensing No. DPR-72.

FLORIDA POWER CORPORATION



P.M. Beard, Jr.
Senior Vice President
Nuclear Operations

SWORN TO AND SUBSCRIBED BEFORE ME THIS 21st DAY OF DECEMBER 1989.



Notary Public

Notary Public, State of Florida at Large
My Commission Expires:

NOTARY PUBLIC, STATE OF FLORIDA,
MY COMMISSION EXPIRES: AUG. 30, 1993.
BONDED THRU NOTARY PUBLIC UNDERWRITERS

**FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72
REQUEST NO. 176 REVISION 0
HIGH RADIATION AREA**

LICENSE DOCUMENT INVOLVED: Technical Specifications

PORTIONS:

6.12 Pages 6-19 and 6-20

DESCRIPTION OF REQUEST:

This submittal requests the addition of integrating alarming dosimeters as an alternative for meeting the requirements for entry into a high radiation area, and clarification of the escort functions provided by an individual trained in Health Physics procedures during entries into high radiation areas.

REASON FOR REQUEST:

The addition of the integrating alarming dosimeters will allow FPC to enhance the controls over doses received by personnel entering high radiation areas. The dosimeters can be set to alarm when a specified integrated dose or dose rate is received independent of any actions on the part of the worker. This function optimizes the dose monitoring capability for the individual by ensuring monitoring activities continue during work activities. This type of monitoring device will also provide additional assurance a personnel error, such as an improper scale setting, misreading of data, misplacing an instrument, or inattention to dose monitoring does not occur, and the level of protection afforded an individual is enhanced.

The clarification of escort functions will upgrade the level of controls established for high radiation area entries when accompanied by an individual trained in Health Physics procedures.

EVALUATION OF REQUEST:

Florida Power Corporation is requesting the use of integrating alarming dosimeters as an alternative radiation monitoring device for entry into a high radiation area as required by Section 6.12 of Technical Specifications. Entry into the high radiation area would be permitted with an integrating alarming dosimeter only after the dose rates in the area have been established in accordance with radiation protection program procedures, and the individuals requesting entry have been made knowledgeable of these conditions. This activity would provide reasonable assurance that the radiation hazards are known and have been adequately evaluated for inclusion on the Radiation Work Permit.

Integrating alarming dosimeters are designed to provide alarms when a radiation worker's preset dose or dose rate is reached as prescribed on the Radiation Work Permit (RWP). The worker is instructed to exit the area immediately upon receipt of the alarm, and to contact the Health Physics Department. The preset values and function modes cannot be changed by the worker in the field. This type control provides additional assurance that changing conditions or worker activities would not allow an individual to exceed the limits of the RWP. The integrating alarming dosimeters will be calibrated in accordance with the applicable ANSI Standard(s), and programmed by the Health Physics staff prior to use.

In addition, these devices are worn by the individual in the same manner as a Pocket Ion Chamber. This design would help prevent a situation in which a worker entered a high radiation area without a radiation monitoring device as a result of a momentary memory lapse or geographical conditions. The wearing of the device also enhances personnel safety by freeing both hands to aid in the stability and mobility of the individual without compromising the continuous radiation monitoring function.

Alarming dosimeters are industry proven and can provide equivalent or, in many cases, improved personnel monitoring capabilities as compared to standard radiation monitoring devices. The use of the alarming dosimeters is expected to reduce the risk of personnel entries into high radiation areas without the proper monitoring instrumentation, thus enhancing the level of protection afforded radiation workers during the performance of their jobs.

Additional wording has been included to define the conditions associated with the escort functions provided by an individual trained in Health Physics procedures during entries into high radiation areas. This activity is permitted by the existing Technical Specifications, but the duties of the escort are not explicitly defined. The additional guidance included in this request will standardize the escort functions by requiring periodic surveys and positive control over activities.

The use of integrating alarming dosimeters and the clarification of escort functions will upgrade the level of radiological protection provided at Crystal River Unit 3, and the requested changes are consistent with Technical Specification requirements throughout the industry.

SHOLLY EVALUATION:

Florida Power Corporation proposes that this amendment does not involve a significant hazards consideration. The addition of integrating alarming dosimeters as an alternative to the present requirements for entry into a High Radiation Area will enhance the protection provided to individuals. This action is consistent with other conditions and requirements established by other licensees.

1. Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated. This change enhances the controls available to protect individuals entering high radiation areas by assuring a monitoring device is available and pre-established dose or dose rate limits are alarmed. Therefore, the probability of occurrence is not increased and the consequences of previously evaluated accidents is not affected.

2. Operation of the facility with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated. This change expands the monitoring and alarm capabilities provided to the individual entering high radiation areas. Therefore, no new accident conditions are created as a result of this change.
3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety. This change does not reduce the margin of safety as the existing requirements are enhanced by the addition of the use of integrating alarming dosimeters and will assure adequate controls are maintained on entries into High Radiation Areas.