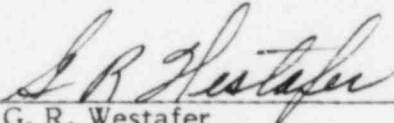


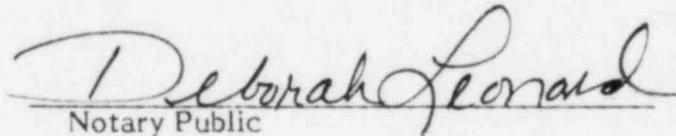
STATE OF FLORIDA
COUNTY OF PINELLAS

G. R. Westafer states that he is the Manager, Nuclear Licensing and Fuel Management, of 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.



G. R. Westafer

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 14th day of January, 1983.



Notary Public

Notary Public, State of Florida at Large,
My Commission Expires: November 19, 1986

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXPIRES NOV 17 1986
BONDED THRU GENERAL INSURANCE UND

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

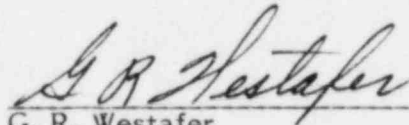
CERTIFICATE OF SERVICE

G. R. Westafer deposes and says that the following has been served on the 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

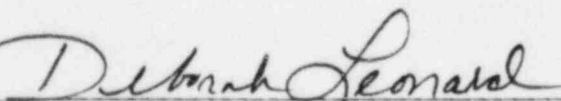
One (1) copy of Technical Specification Change Request No. 105 requesting amendment to Appendix A of Operating License No. DPR-72.

FLORIDA POWER CORPORATION



G. R. Westafer
Manager
Nuclear Licensing and Fuel Management

SWORN TO AND SUBSCRIBED BEFORE ME THIS 14th DAY OF JANUARY, 1983.


Notary Public

Notary Public, State of Florida at Large
My Commission Expires: November 19, 1986

(NOTARIAL SEAL)

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXPIRES NOV 17 1986
BONDED THRU GENERAL INSURANCE UND

TECHNICAL SPECIFICATION CHANGE REQUEST NO. 105

ENGINEERED SAFEGUARDS INSTRUMENTATION FUNCTIONAL TESTING

PROPOSED CHANGES

Replace pages 3/4 3-18, 3/4 3-20, 3/4 3-21 and B 3/4 3-1 of Appendix A with the appropriate revised pages, attached. The major changes can be summarized as follows:

- 1) Change the frequency of the CHANNEL FUNCTIONAL TEST for the Manual Initiation Functional Units from monthly to refueling. (Functional Units: 1.a.1, 1.b.1, 2.a., 3.a., and 5.f.). Change the MODES IN WHICH SURVEILLANCE REQUIRED to indicate MODE 5 and on page 3/4 3-21, delete from note (1) "All other circuitry associated with manual safeguards actuation shall receive a CHANNEL FUNCTIONAL TEST at least once per 31 days". to reflect this change.
- 2) Add to note (3) "Channel Functional Testing need not include operation of activated equipment where such operation could adversely affect the safety or operability of the equipment or where equipment is normally in the post accident configuration."

REASONS FOR THE PROPOSED CHANGES

The Crystal River Unit 3 ESFAS was designed to be tested during power operation in accordance with IEEE-279 (1971). This was accomplished by grouping the various actuated equipment into test groupings chosen with the intent that testing separate groups could be accomplished with properly controlled test procedures. However, as operational experience has been gained, we have identified several potential adverse consequences which have resulted or could result from such testing. All of these adverse consequences pose significant threat to plant reliability and may pose safety concerns of varying severity. Recent reviews have concluded that we have not, heretofore, tested the ESFAS in the manner implied by our FSAR and as described in Regulatory Guide 1.22 and, furthermore, we are compelled to cease such testing during power operation to maintain an adequate level of plant safety/reliability.

PROPOSED PROGRAM FOR PERMANENT RESOLUTION

Florida Power Corporation recognizes the need to maintain an adequate test program and that permanently extending all Channel Functional Testing associated with operation of actuated equipment to a refueling frequency may not be the optimum program to assure reliable operation of the Engineered Safeguards System. We, therefore, propose the following course of action:

- 1) Defer all such testing until Refuel IV scheduled for March, 1983.
- 2) Develop appropriate surveillance tests before restart from Refuel IV to allow safe and reliable testing during power operation in Cycle V and, thereafter, for those test groups which can be so tested without modifications.
- 3) Perform a detailed review of ESFAS testability to determine what actions are necessary to allow optimum testing of the system. These options may include any of the options provided in Regulatory Guide 1.22 and may include deletion from the ESFAS of equipment which should be maintained in normal operational configuration for post-accident operations (i.e., RCP seal return valves). Florida Power Corporation intends to complete this review on a schedule to support performance of any needed plant modifications in Refuel V but will discuss this

with the NRC Staff after preliminary studies are complete and the project can be planned/scheduled in detail. The results of this study will be forwarded to the NRC staff for concurrence prior to performance of any modifications and in accordance with the intent of Regulatory Guide 1.22 and the Standard Review Plan. Staff concurrence on acceptable long term test frequency will also be sought.

SAFETY ANALYSIS

It is considered appropriate to change the Manual Initiation Functional Unit Channel Functional Test frequency on a permanent basis since this function is not relied upon in any safety analyses. The detailed review discussed above will re-evaluate this position to assure staff concurrence.

The program described above and reflected in this Change Request is not considered to represent a degradation of overall plant safety when consideration is given to the adverse consequences of such testing. The attached tables summarize the reviews performed to date. Table 1 associates each test group with the potential adverse consequences resulting from the testing of any components in that group. Table 2 provides a more detailed evaluation on a component by component basis.

The interim situation until any necessary design changes are implemented is considered to be further mitigated by the following:

- 1) The ESFAS from the sensor to the logic matrix is and will be tested on a monthly basis. This includes the associated relays which are considered the least reliable components in the ESFAS system.
- 2) A large portion of the ACTUATED EQUIPMENT is tested in accordance with 10 CFR 50.55 a (ASME XI, Pump and Valve Program) and/or other requirements.
- 3) The performance of a complete test on 3 of the 10 test groups to date has not identified any significant defects which would not have been identified by the testing above. A detailed review of all Work Requests associated with SP-355 is being conducted and will be utilized in the engineering study referenced above.
- 4) The entire Functional Unit Channel Functional Test has and will be performed during refueling outages.
- 5) The components for which testing is deferred are primarily passive connections which are not considered subject to rapid undetected degradation.

Therefore, based on comparative risk of testing, the mitigating factors listed above and Florida Power Corporation's commitment to perform, and seek Staff concurrence with more detailed reviews in an expeditious fashion, this change is consistent with safe and reliable operation of Crystal River Unit 3.