

**Florida
Power**
CORPORATION

January 6, 1982
#3F-0182-01
File: 3-0-26

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Status of NUREG-0737 Items

Dear Mr. Eisenhut:

Over the past twelve months, Florida Power Corporation has corresponded numerous times regarding our implementation of the post-TMI items addressed in NUREG-0737 via your October 31, 1980 letter. As discussed with members of your staff late last year, our best efforts were not successful in accomplishing all tasks we have previously intended to complete by January 1, 1982. By this letter, Florida Power Corporation documents the status of our implementation of these items as they pertain to Crystal River Unit 3.

Attachment 1 provides an item-by-item status of the NUREG-0737 items for which implementation was required by January 1, 1982, or shortly thereafter. Pursuant to our previous commitments, good faith efforts have been made to accomplish these items during the recent refueling outage (Refuel III). Our efforts were made consistent with good engineering and business practices so as to not preclude our commitment to overall plant safety and our commitment to limit the financial impact upon our customers.

Where possible, modifications were made during Refuel III to allow completion of these items upon arrival of equipment and concurrent with continued operation. For those items where accomplishment was not deemed as reasonable, the implementation will be accomplished at the first available outage of sufficient duration following completion of engineering, design, and procurement activities. For select items, this first available opportunity may occur during Refuel IV which is currently scheduled for the spring of 1983. In either case, the interim measures found acceptable by your May 5, 1980 letter regarding NUREG-0578 items (TMI-2 Short Term Lessons Learned) will remain in effect until full implementation of these NUREG-0737 items are achieved.

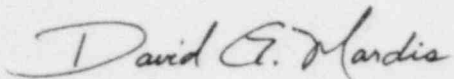
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Attachment 2 is provided to show a listing of other regulatory activities that were aggressively pursued by Florida Power Corporation during Refuel III. These activities, plus the major ones recommended by our Nuclear Safety Task Force (see our letters of November 2, 1980, March 6, 1981, and April 16, 1981) were accomplished being fully cognizant of the limited resources with which we deal and our commitment to the continued safe operation of Crystal River Unit 3.

Very truly yours,



David G. Mardis
Acting Manager
Nuclear Licensing

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Attachments

ATTACHMENT 1

NUREG-0737 Related Activities

ITEM	TITLE	DESCRIPTION	ORIGINAL SCHEDULE	STATUS/REMARKS	REASON FOR DELAY	CURRENT SCHEDULE
I.C.1	Anticipated Transient Operating or Guidelines (ATOG)	Development of site specific procedures	First refueling outage after 1/1/82	Guidelines have been prepared. Transformation into procedures in progress.	On Schedule	Implement no later than Refuel IV (Spring 1983)
II.B.1	RCS Vents	High Point Vents	7/82	Pre-detailed design review complete during Refuel III as well as <u>partial</u> installation	Neither detailed design nor procurement were sufficiently complete to accomplish during Refuel III	Refuel IV
		Head Vents	7/82	Technical evaluation of regulation under review by FPC.	Open	TBD
II.B.2	Plant Shielding	Waste Gas Header	1/1/82	Complete	NA	NA
		Valve Operators	1/1/82	Awaiting Equipment Delivery Interim measure (NUREG-0578) still in effect	Delay in receipt of Rotohammer extension and limitorque operators	2nd Qtr 1982
		Waste Disposal Panels	1/1/82	Closed per our 10/2/81 letter	NA	NA

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NUREG-0737 Related Activities

ITEM	TITLE	DESCRIPTION	ORIGINAL SCHEDULE	STATUS/REMARKS	REASON FOR DELAY	CURRENT SCHEDULE
11.B.3	Post-Accident Sampling	Installation of up-graded integrated post-accident sampling system	1/1/82	Partial installation in Refuel III. Interim measures (NUREG-0578) still in effect	FPC system exceeds NRC requirements significantly. System design and procurement not yet complete. (Ref. our 12/30/81 letter)	Refuel IV
11.E.4.1	Dedicated Hydrogen Penetration	Modify as needed	7/1/81	Complete per your 8/19/81 letter	NA	NA
11.F.1	Accident Monitoring	Noble Gas	1/1/82	In progress	Awaiting equipment delivery	2nd Qtr 1982
		Iodine	1/1/82	In progress	Awaiting equipment delivery	2nd Qtr 1982
		High Range Radiation	1/1/82	Partially complete (Operable; non-qualified)	Equipment delivery & minor design changes/qualification in progress	Refuel IV
		Containment pressure	1/1/82	In progress	Awaiting transmitter delivery	2nd Qtr 1982
		Containment water level	1/1/82	Redesign required with ALARA practices	Design inconsistency	Refuel IV
		Containment Hydrogen	1/1/82	In progress	Awaiting equipment delivery	3rd Qtr 1982

ATTACHMENT 1

NUREG-0737 RELATED ACTIVITIES

ITEM	TITLE	DESCRIPTION	ORIGINAL SCHEDULE	STATUS/REMARKS	REASON FOR DELAY	CURRENT SCHEDULE
11.F.2.3	Inadequate Core Cooling Instrumentation	Install Reactor Vessel Instrumentation	1/1/82	FPC evaluation continuing (Ref. our 11/10/81 letter)	Awaiting NRC staff concurrence	TBD
11.K.2	Orders on B&W Plants	(10) Safety Grade Anticipatory Reactor Trip	7/1/81	Complete Tech Specs Under development. (Ref. our 12/4/81 letter)	NA	NA
		13) Thermal-Mechanical Report	1/1/81	Complete (Ref. our 1/30/81 letter) Additional plant specific analysis in progress is due to be completed in 3rd Qtr. 1982	NA	NA
11.K.3.30	Bulletins and Orders Task Force Final Recommendations	Small Break LOCA Model Upgrade (Integrated Systems Tests, etc)	1/1/82	Discussions ongoing between FPC and NRC staff. (Ref. our 11/10/81 letter)	Magnitude of scope	6/1/82
111.A.1.2.3	Emergency Support facilities Upgrade	Technical Support Center	10/82	Building complete. Will become operable within original schedule. RECALL installation not yet complete.	Awaited end of Refuel III to begin transfer of communications, etc.	1st Qtr 1982 (except RECALL)
		Emergency Operations Facility	10/82	Land purchased. Design nearly complete. Bids on construction being sought.	Awaiting staff position on location until few months ago. Proceeded from that point	Refuel IV

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NUREG-0737 Related Activities

ITEM	TITLE	DESCRIPTION	ORIGINAL SCHEDULE	STATUS/REMARKS	REASON FOR DELAY	CURRENT SCHEDULE
III.A.2.1	Emergency Preparedness	Development of Emergency Plan (NUREG-0654)	4/81	Complete	NA	NA
III.A.2.2	Emergency Preparedness (Continued)	Meteorological upgrade	6/83	Pursuing immediate action letter commitments	Awaiting verification on schedule	TBD
III.D.3.4	Control Room Habitability	Modify ventilation system for toxic gas detection	Refuel IV	Scheduled to be done on-line prior to receipt of chemicals at nearby fossil facility	NA	2nd Qtr 1982

Attachment 2

Other Regulatory Related Activities

FIRE PROTECTION SER.

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ITEM	TITLE	DESCRIPTION	ORIGINAL SCHEDULE	STATUS/REMARKS	REASON FOR DELAY	CURRENT SCHEDULE
3.5	R.B. Fire Standpipe	Install	Prior to Refuel III Restart	Complete		
3.14	Fire-proofing Cable-Spreading Room Floor	Install	Prior to Refuel III Restart	Complete		
3.15(f)	Fire Detection	Install	Prior to Refuel III Restart	Complete		
3.17	Cable Tray Fire Shops	Install	Prior to Refuel III Restart	Complete		
OTHER =====	Asymmetric LOCA Loads	Modify Reactor Vessel Access Platforms (Ref. our 9/24/81 letter)	Prior to Refuel III Restart	Complete		
IEB 79-01B	Environmental Qualification	Relocate valves above Reactor Building flood level	Prior to restart 6/82	Complete	NA	NA
		Install Auxiliary Steam Isolation Valve	6/82	In progress	Auxiliary Steam Header modification during outage unacceptable.	2nd Qtr 1982
NUREG-0578	Auxiliary Building Gaseous release	Install door to contain gases	1/1/82	Partially complete	Equipment Delivery (louvres)	1st Qtr 1982