

May 10, 1990 3F0590-02

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

Subject: Crystal River Unit 3

Docket No. 50-302

Operating License No. DFR-72

Technical Specification Change Request No. 178

Diesel Generator 18 Month Testing

Dear Sir:

Power Florida Corporation (FPC) hereby submits Technical Specification Change Request No. 178 requesting amendment to Appendix A of Operating License No. DPR-72. Proposed replacement pages for the current Crystal River 3 (CR-3) Technical Specifications are provided.

This submittal changes the Technical Specifications to update the 18 month emergency diesel generator load testing to reflect the increased diesel generator capability.

Sincerely,

P. M. Beard, Jr. Senior Vice President

Nuclear Operations

PMB: AEF:

Attachment

xc: Regional Administrator, Region II Senior Resident Inspector

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STATE OF FLORIDA

COUNTY OF PINELLAS

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 10th day of May 1990.

Notary Public

Joan Fish Bufgi

Notary Public, State of Florida at Large,

My Commission Expires: My Commission Expires: June 21 1991

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

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FLORIDA POWER CORPORATION

DOCKET NO. 50-302

CERTIFICATE OF SERVICE

P. M. Beard, Jr. deposes and says that the following has been served on the Chief Executive of Citrus County, Florida. and Designated State Representative by deposit in the United States mail, aggressed 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. 178, requesting Amendment to Appendix A of Operating License No. DPR-72.

Florida Power Corporation

P. M./Beard, Jr. Senior Vice President

Nuclear Operations

SWORN TO AND SUBSCRIBED BEFORE ME THIS 10TH DAY OF MAY 1990.

Notary Public

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

NOTARY PUBLIC, STATE OF FLORIDE,
MY COMMISSION EXPIRES: JUNE 21, 1997,
MONDED THRU NOTARY PUBLIC UNDERWRITERS;

FLORIDA POWER CORPORATION CRYSTAL RIVER UNIT 3 DOCKET NO. 50-302/LICENSE NO. DPR-72 REQUEST NO. 178, REVISION 0 D. ASEL GENERATOR 18 MONTH TESTING

LICENSE DOCUMENT INVOLVED: Technical Specifications

PORTIONS: 4.8.1.1.2.d.4 and 5

4.8.1.2.2.d.4, 5, and 6

DESCRIPTION OF REQUEST:

This submittal requests that the surveillance for the full load cost of the diesel generators be changed to reflect increased capabilities of the modified machines.

This change also deletes the requirement for surveillance of the block load timers in Modes 5 and 6, and two notes which are not applicable after the end of Cycle 7.

REASON FOR REQUEST:

These specifications were changed in February, 1988, after it was discovered that the previous specification required exceeding the manufacturer's short time rating. The specification was changed to require operation in the 30 minute rating for a short time to demonstrate the capability to accommodate worst case accident loads. The remainder of the 1 hour test was then completed at a lower load.

Modifications are being installed to reduce the maximum worst case load on the "A" diesel and to provide increased capability for both machines. The new ratings are as follows:

RATING	TIME
0 - 2850 kw	Continuous
2851 - 3000	2000 Hours
3001 - 3250	200 Hours
3251 - 3500	30 Minutes

These modifications allow the 18 month load test to be performed for the entire hour at a load above the automatically connected accident load.

Specifications 4.8.1.1.2.d.4 and 4.8.1.2.2.d.4 are being modified to require the test to be performed at a load greater than or equal to 3100 kw, but less than 3250 kw. The minimum load of 3100 kw was selected because it provides a significant margin above the worst case automatically connected loads (2900 kw). The maximum load of 3250 kw was selected because it is the upper limit of the 200 hour rating. The wording of the specification is being changed to more closely reflect the wording that existed before the 1988 change.

Specifications 4.8.1.1.2.d.5 and 4.8.1.2.2.d.5 are being modified to require a test to verify the auto-connected loads do not exceed 3100 kw. This was selected as the maximum load because it is the maximum value for which the diesels are qualified by the 18 month load test.

The surveillance requirement for the automatic load sequence timers is being deleted in Modes 5 and 6 because the accidents for which the timers are needed to assure proper diesel generator loading cannot occur in those modes.

The two notes are being deleted because they are not applicable and unnecessarily complicate the specification.

EVALUATION OF REQUEST:

The diesel generator 18 month load test is performed to assure the diesel generators continue to have the capability to supply the worst case accident loads. The capabilities of the diesel generators and the worst case accident loads will change as a result of the modifications being installed. This change to the surveillance test updates the specification to reflect the upgraded configuration of the plant. By deleting the requirement that the diesel generator be operated in the 30 minute rating, this change eliminates unnecessary stress on the machine, thereby enhancing safety.

The reduction of the maximum allowable auto-connected load from 3248 to 3100 kw assures the diesel generators will not be subjected to loads above the value for which they have been qualified by test.

The elimination of the surveillance requirement for the block load timers and mon-applicable notes has no safety significance.

SHOLLY EVALUATION OF REQUEST:

The proposed change in the 18 month diesel generator testing does not involve a significant hazard consideration. The revised specification will ensure continued proper testing of the emergency diesel generators and as such, represents a continuance of the present level of safety.

Based on the above, it is concluded this change will not:

- Involve a significant increase in the probability or consequence of an accident previously evaluated because this change provides assurance that proper testing is performed to assure the diesel generators will perform their intended safety function should they be called upon to do so.
- 2. Create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change assures testing is performed to confirm the assumptions of electrical power availability in the safety analysis documented in FSAR Chapter 14 remain valid.
- 3. Involve a significant reduction in the margin of safety because this change changes the diesel generator load testing requirements to reflect current plant design. The margin of safety with respect to the previous values and plant design remains the same.