

March 31, 1982 #3F-0382-33 File: 3-0-26

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

Subject: Crystal River Unit 3 Docket No. 50-302 Operating License No. DPR-72 NUREG-0737, Item II.D.1 Safety and Relief Valve Testing Program



Dear Mr. Eisenhut:

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PDR

In accordance with NUREG-0737, Item II.D.1 (as revised by your letter dated September 29, 1981) Florida Power Corporation hereby submits our preliminary assessment of the EPRI PWR Safety and Relief Valve Test Program and the potential effects that this testing may have on Crystal River Unit 3 (CR-3).

Output to date of the EPRI program which are of interest and are applicable are:

- a) Valve Selection/Justification Report,
- b) Test Condition Justification Report,
- c) B&W Plant Condition Justification Report, and
- d) Safety and Relief Valve Test Report.

These documents have been transmitted to you by Mr. David Hoffman of Consumers Power Company on behalf of the participating PNR utilities and are incorporated by reference herein as part of our preliminary response.

In December, 1981, and August, 1981, testing of Safety and Relief Valves, respectively, was completed per the scope of the aforementioned EPRI Program. Based on preliminary review of these results, a general evaluation has been performed on a plant specific basis and the following assessments have been made:

Results of the relief valve testing conducted at the Marshall 1) Steam Electric Station and the Wyle/Norco facility indicate, preliminarily, that generally favorable performance can be realized under all conditions. Items which may be discovered, during a more detailed review of tests will be evaluated and reported by July 1, 1982.

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- 2) Safety valve testing for the Dresser valves was performed very late in the EPRI program, and, as a result, only a very preliminary assessment can be reported at this time. Several items of potential concern have been identified and are under active consideration at this time. It is anticipated that these items can be resolved in a satisfactory manner, and it is hoped that these items will be resolved to allow incorporation in a July 1, 1982, submittal. However, a specifically defined schedule supporting that date is not complete at this time. As the specific items and their respective schedules are formulated, they will be reported to you in a timely manner, prior to July 1, 1982.
- 3) Discharge piping and support evaluations, as reported to you in our August 7, 1981, letter, were performed for Crystal River Unit 3 subsequent to our February 26, 1980 transient. Our preliminary review of the EPRI valve testing results has shown nothing which would invalidate this analysis. These analyses should satisfy your concern related to the valve operability/discharge piping interface.

Based on the above, FPC's preliminary review has indicated that the performance of the safety and relief valves and the associated discharge piping and supports is generally acceptable. Specific items of interest will be further evaluated and resolved in a manner consistent with prudent criteria to assure that the operation of CR-3 with regard to the health and safety of the public is maintained.

If you have any questions and/or comments, please advise this office.

Very truly yours,

David G. Mardia

David G. Mardis Acting Manager Nuclear Licensing

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cc: Mr. J. P. O'Reilly
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