

April 1, 1982

File: 3-0-3-e #3F-0482-03

Mr. Harold R. Denton, Director 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 Request for Interim Emergency Authorization



Dear Mr. Denton:

Florida Power Corporation hereby requests authorization to operate Crystal River 3 at 75% Full Power with the reactor coolant pump power monitors bypassed. The attached summary explains and justifies this request.

This request precedes submittal of a request for authorization to operate at 2300 MWt (90% of Rated Thermal Power) which will be supported by more detailed analyses already completed by Babcock & Wilcox but not yet ready for formal submittal.

Your immediate review of this request will be appreciated. If further information is required, please contact this office.

Florida Power Corporation has determined that this action requires Class III approval per 10CFR170.22. Accordingly, a check in the amount of four thousand (\$4,000) dollars is enclosed.

Very truly yours,

alay y. Baynard P. Y. Baynard

Manager, Nuclear Support Services

Attachment

cc: J. P. O'Reilly, Regional Administrator Office of Inspection & Enforcement U.S. Nuclear Regulatory Commission 101 Marietta Street, Suite 3100 Atlanta, Georgia 30303

JUSTIFICATION FOR CONTINUED OPERATION WITHOUT REACTOR COOLANT PUMP POWER MONITORS (RCPPM'S)

April 1, 1982

BACKGROUND

By Amendment 46 to the Crystal River Unit 3 Technical Specifications, the NRC approved operation of the urit at an increased power level for Cycle 4. The approval was partially based on installation and operability of the reactor coolant pump power monitors (RCPPM's). A number of spurious reactor trips based on RCPPM's have been experienced. They originated from minor transmission system upsets. The frequency of these trips is unacceptable both from a safety and economic standpoint. Therefore. Florida Power intends to bypass the RCPPM's and to operate at reduced power until the problems can be resolved or analyses is developed to operate without the RCPPM's at Rated Power.

JUSTIFICATION

Operation without RCPPM's is considered justified at a reduced power level for the following reasons:

- a. The only other Reactor Protection Systems related change supporting the power level increase was a decrease in the conservatism for the flux/flow trip setpoints and response time taking credit for the anticipatory trip of the RCPPM's. The effect of these changes (1.08 vs. 1.044 and 1.79 vs. 1.4 seconds) can be balanced by reducing power level. A reduction of 25% Full Power is considered guite conservative.
- b. Authorization for operation at a higher power level (supported by detailed analysis), will be sought from the NRC in an expeditious manner.

CONCLUSION

Operation at no more than 75% Rated Power (overpower trip setpoints of 79.92%) does not constitute an unreviewed safety question. Ultimate resolution, changed to Technical Specifications, will be accomplished in a timely fashion.

Ford(R04)C2-2

STATE OF FLORIDA COUNTY OF PINELLAS

PATSY Y. BAYNARD states that she is the Manager, Nuclear Support Services, of Florida Power Corporation; that she 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 her knowledge, information, and belief.

PATSY Y BAYNARD

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 1st day of April, 1982.

Margaret G. Chigamore Notary Public

Notary Public, State of Florida at Large, My Commission Expires: May 29, 1984