

**Florida
Power**
CORPORATION

W. P. STEWART, DIRECTOR
POWER PRODUCTION

October 9, 1978

File: 3-0-3-a-3

Mr. Robert W. Reid, Chief
Operating Reactor Branch #4
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
ECCS Small Breaks Analysis

Dear Sir:

Your letter of September 26, 1978 (received October 2, 1978) provided the staff position regarding allowable operator actions for which credit may be taken following a Condition III event (small LOCA). It also requested within seven days for FPC to state whether we will 1) provide a new analysis which demonstrates that the modification proposed in our July 21, 1978 letter will meet the staff position with respect to the allowable credit for operator action or 2) propose a new modification and an analysis that meets the staff position. In addition, you requested FPC to determine if the June 14, 1978 submittal meets any one of the staff's positions and if so, to state the position we meet and the basis for our determination.

It is Florida Power's intention to pursue the modification proposed in our July 21, 1978 letter. Analyses are presently being performed to determine if operator action is required to balance the HPI flow under a one pump-four injection line condition. If balancing is required, flow limiters will be placed on the necessary injection lines to automatically perform this function, preempting operator action, and balancing the flow almost as soon as it is established. The flow limiters probably would be either orifices or automatic flow controllers.

As no new analysis and/or modification is being proposed, no submittal schedule for such is required. However, the flow balance analysis is scheduled to be completed on or about October 27, 1978.

LPDR

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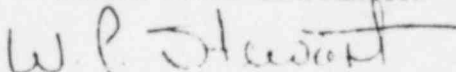
Our submittal of June 14, 1978, does not meet any of the staff positions regarding allowable operator actions for which credit may be taken following a Condition III event (small LOCA).

Finally, we acknowledge the NRC approval of the simplified FOAM code as proposed by B&W in their August 11, 1978 letter to the Commission.

If you need any further information, please contact this office.

Sincerely,

FLORIDA POWER CORPORATION

A handwritten signature in dark ink, appearing to read "W. P. Stewart". The signature is written in a cursive style with a long horizontal stroke extending to the right.

W. P. Stewart

WPS/ldd
R11(10/5)

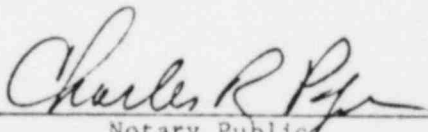
STATE OF FLORIDA

COUNTY OF PINELLAS

W.P. Stewart states that he is the Director, Power Production, 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.


W.P. Stewart

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 9th day of October, 1978.


Notary Public

Notary Public, State of Florida at Large,
My Commission Expires: July 25, 1980