Florida Power
CORPORATION

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Mr. John F. Stolz, Chief
Operating Reactors Branch #4
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
NUREG-0737, Item II.K.3.17
Report on Outages of Emergency Core Cooling Systems

Dear Mr. Stolz:

In your request for additional information on the subject item (dated July 8, 1982) you requested Florida Power Corporation (FPC) to provide supplemental information to our March 31, 1981 submittal on this item. Your requests and our responses follow.

Item 1: A complete summary of outages for surveillance testing in the ECC and diesel generator systems for the period coinciding with the initial report (i.e., December 3, 1976, to March 17, 1981).

Response 1: While surveillance testing of the ECC and diesel generator systems took place as required during the period of the initial report, the duration of these outages is unrecorded. Therefore, no summary of outages is forwarded as it would be meaningless without specific duration information. (See Response 3 below).

Item 2: Clarification of the basis of the table of non-reportable occurrences and inclusion of outage durations.

Response 2: As stated in our March 31, 1981 letter, the basis for the table of non-reportable occurrences is "those remaining [equipment] outage incidents (e.g., due to testing or maintenance during shutdown) where the system or component was not required to be operable per the CR-3 Standard Technical Specifications". The example in parentheses is only one example. If equipment was not required during power operation, it could be taken out of service and not reported.

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The key is whether or not the equipment was required to be operable by the Crystal River Unit 3 (CR-3) Technical Specifications in the mode of operation at the time of the equipment outage. For example, taking a high pressure injection pump out of service for testing during power operation is not reportable if the other two pumps are operational as required by the CR-3 Technical Specifications.

Item 3: Wherever outage durations are not available for an outage event, an estimate of the outage duration should be supplied.

Response 3: FPC cannot with good engineering judgement, estimate a duration for an equipment outage when such duration is not documented. To estimate a longer than actual outage duration would indicate that the ECC systems were unavailable more than they actually were. This would lead to a false conclusion that additional requirements are needed to limit this outage time. To estimate a shorter than actual outage duration would indicate that the ECC systems were more available than they actually were. This would lead to a non-conservative conclusion that the ECC systems were more available than they actually were.

Based upon our evaluation of CR-3 ECCS outages, the total outage time the ECCS has been inoperable has been minimal when compared to the total time the systems were required to be operable by the CR-3 Technical Specifications. Therefore, a cumulative outage limitation for the Emergency Core Cooling System is not warranted.

Very truly yours,

David G. Mardis

David G. Mardis
Acting Manager
Nuclear Licensing

Attachments

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cc: Mr. J. P. O'Reilly
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