

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 80-302

January 7, 1994
3F0194-02

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

Subject: Evaluation of Methods for Developing Floor Response Spectra for the
Resolution of Unresolved Safety Issue (USI) A-46 (TAC M69440)

References: 1. NRC to FPC letter, 3N1293-27, dated December 16, 1993
2. FPC to NRC letter, 3F0992-02, dated September 4, 1992
3. FPC to NRC letter, 3F0493-09, dated April 16, 1993
4. FPC to NRC letter, 3F0893-12, dated August 27, 1993

Dear Sir:

Florida Power Corporation (FPC) has reviewed the Safety Evaluation Report (SER) (Reference 1) prepared by the NRC Staff on the floor response spectra to be used for the resolution of USI A-46. We are pleased the Staff found the spectra acceptable; however, FPC is submitting this letter to clarify our position on the use of the floor response spectra at Crystal River Unit 3 (CR-3).

The cover letter and SER both point out that "[t]his conclusion is based on the assumption that the subsequent verification of the equipment and anchorages will be in accordance with Supplement 1 to Generic Letter 87-02." That supplement was a cover letter for the SER on Revision 2 of the Generic Implementation Procedure (GIP) produced by the Seismic Qualification Utility Group (SQUG). The letter requested utilities to commit to perform plant walkdowns in accordance with the GIP.

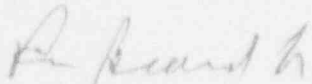
As noted in FPC's initial response to Generic Letter 87-02, Supplement 1 (Reference 2) and subsequent status update (Reference 3), FPC plans to walk down CR-3 in accordance with a plant specific procedure based on the GIP. This procedure and supporting documentation has been submitted to the NRC (Reference 4). In most cases the plant specific procedure is equivalent to the GIP for a low seismic risk plant like CR-3 in that it provides a comparable safety enhancement as would be achieved through use of the GIP at a higher seismic risk site. This fact is supported by the documentation which accompanied Reference 4.

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Because of that equivalency, the floor response spectra upon which the Staff based the subject SER are equally applicable to the plant specific procedure for CR-3 as they are to the GIP.

Sincerely,



P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

PMB/AEF:

xc: Regional Administrator, Region II
NRR Project Manager
Senior Resident Inspector