

**Florida
Power**
CORPORATION

August 27, 1982
#3F-0882-20
File: 3-0-16-b

Mr. John F. Stolz, Chief
Operating Reactor 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
ASME Section XI Code Relief

Dear Mr. Stolz:

The current Inservice Inspection Program at Crystal River Unit 3 is based, for the most part, upon ASME Code Section XI 1974 Edition through Summer 1975 Addenda. Florida Power Corporation (FPC) hereby requests relief from the inspection requirements of ASME Section XI, 1974 Edition, Article IWB-2000, Table IWB-2500, Items B-I-1 and B-I-2 and Table IWB-2600, Items B1.13, B1.14, B2.9 and B3.8 regarding visual and volumetric inspections of reactor vessel and head cladding. FPC wishes to adopt Section XI, Summer 1976 Addenda, Tables IWB 2500 and IWB 2600 which delete these inspection requirements.

The following statements form the basis of Florida Power Corporation's request.

1. The radiation levels in the reactor vessel head and steam generator are approximately 3 R/hr and estimated to be 15 R/hr in the pressurizer. The inspections that are required will result in unnecessary radiation exposure which is contrary to the ALARA principle.
2. There has been no observed cladding degradation in the areas addressed by this portion of the Code.
3. In the future after work is performed in the immediate area, a visual inspection of the areas addressed in the ASME Code will be performed.
4. The 1976 Summer Addenda to ASME Section XI no longer requires these inspections.

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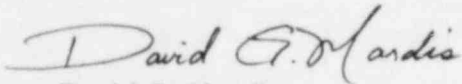
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J.F.Stolz
August 27, 1982
Page -2-

Relief from this requirement will not affect the safe operation of Crystal River Unit 3. Furthermore, elimination of these items by the ASME from the previous code implies that Florida Power Corporation's request for relief from these requirements is justified and safe.

If there are any questions, please contact this office.

Very truly yours,



David G. Mardis
Acting Manager
Nuclear Licensing

MF:jk

Attachments

cc: Mr. J. P. O'Reilly
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
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