

April 6, 1994

Docket No. 50-302

Mr. P. M. Beard, Jr., Senior Vice President
Nuclear Operations
Florida Power Corporation
Crystal River Energy Complex
15760 W. Power Line Street
Crystal River, Florida 34428-6708

Dear Mr. Beard:

Mr. James Taylor, Executive Director of Operations, U.S. Nuclear Regulatory Commission (NRC), asked me to respond to your letter to him of March 3, 1994. In your letter, you stated that Florida Power Corporation (FPC) intends to use a performance-based approach to resolve the Thermo-Lag fire barrier issues at Crystal River Unit 3. You submitted an outline of a proposed performance-based approach and recently presented the approach to NRC management.

Based on the limited information provided, we also do not believe the performance based approach is consistent with the requirements of Appendix R and that either a plant specific exemption or change to the rule would be necessary to implement your proposal.

The staff is currently awaiting a petition for rulemaking from the Nuclear Energy Institute (NEI) and has met with NEI representatives to discuss their approach to a performance based fire protection rule. You should consider coordinating your proposal with the NEI petition for rulemaking activities. You should also consider other options available to you to resolve Thermo-Lag issues which do not involve rulemaking or exemption. The NRC staff is available to meet and discuss these issues in more detail.

Please have someone on your staff contact Mr. L. Raghavan, the Crystal River licensing project manager, NRR, if there are any questions. He can be reached at 301-504-1471.

Sincerely,

Original signed by

William T. Russell, Director
Office of Nuclear Reactor Regulation

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