



October 22, 1982
 #3F-1082-25
 File: 3-B-4

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 USNRC REGION 2
 ATLANTA, GEORGIA

Mr. John F. Stolz, Chief
 Operating Reactors Branch #4
 Division of Licensing
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555

Subject: Crystal River Unit 3
 Docket No. 50-302
 Operating License No. DPR-72
 LER 82-058, High Energy Line

Dear Mr. Stolz:

By Licensee Event Report (LER) 82-058, Florida Power Corporation (FPC) reported that High Energy Lines had existed in the Crystal River Unit 3 (CR-3) reactor building. The lines are used to blowdown the Once Through Steam Generators (OTSG's) for chemistry control during startup to approximately fifteen percent (15%) RATED THERMAL POWER. The lines are seismically restrained, and the piping is designed for appropriate temperatures and pressures attained during blowdown. The lines were isolated to resolve the immediate High Energy Line Break concern. The long term benefit-cost of maintaining the lines isolated was not addressed at that time because of a study being performed on restraining the lines for pipe whip. That study is now complete, and the alternatives are being reviewed. It is anticipated that the approved alternative can be completed during Refuel V.

In the interim, FPC requests NRC concurrence to maintain these lines in a High Energy Line state during each startup of CR-3 until Refuel V. The lines are used for chemistry control in the OTSG's from MODE 5 (COLD SHUTDOWN) until approximately fifteen percent (15%) RATED THERMAL POWER. The valves would then be closed on the next scheduled entry into the reactor building by operations personnel. (Entries are made approximately every two (2) to four (4) weeks to inspect equipment).

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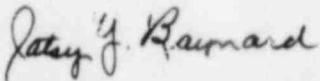
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It is recognized that the failure of one of these pipes could lead to a non-isolable draining of an OTSG and possible pipe whip/impingement damage to equipment in the reactor building. However, Florida Power Corporation considers continued operation of Crystal River Unit 3 with these lines as High Energy Lines for short periods of time justifiably warranted based on the benefit derived from chemistry control of the OTSG's which is essential to preclude tube failure.

FPC has determined this request to be a class III amendment per 10 CFP 170.22 as it involves a single safety issue. Based on this determination, the fee of four thousand dollars (\$4,000) will be forwarded.

Your efforts to consider this request on an emergency relief basis is sincerely appreciated.

Very truly yours,



Dr. Patsy Y. Baynard
Assistant to Vice President
Nuclear Operations

RMB/myf

cc: Mr. J.P. O'Reilly
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