

**Florida
Power**
CORPORATION

Crystal River Unit 3
Docket File No. 50-302

February 22, 1991
3F0291-08

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Technical Specification Change Request No. 165
Fire Service System

Reference: A. FPC to NRC Letter dated August 18, 1989, Submittal of TSCR
#165, Rev. 0
B. NRC to FPC Letter dated April 30, 1990, NRC rejection of
TSCR #165, Rev. 0

Dear Sir:

Florida Power Corporation (FPC) hereby submits Technical Specification Change Request (TSCR) No. 165, Revision 1, requesting amendment to Appendix A of Operating License No. DPR-72. As part of this request, the proposed replacement pages for Appendix A are provided.

This submittal proposes the deletion of the fire protection requirements from the Technical Specifications. This is proposed in accordance with the guidance provided in Generic Letter 86-10, "Implementation of Fire Protection Requirements", and Generic Letter 88-12, "Removal of Fire Protection Requirements from Technical Specifications". FPC requests this amendment be made effective 120 days after issuance to allow for procedure revisions and training.

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PDR ADOCK 05000302
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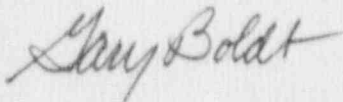
A Florida Progress Company

ADD 11

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Revision 0 of this TSCR submittal was not accepted by the NRC since it took credit for industry positions related to the Technical Specification Improvement Program which went beyond the scope of Generic Letter 88-12 with respect to the removal of Remote Shutdown Panel (RSP) requirements. This change request, Revision 1, does not propose the removal of the RSP requirements and, therefore, maintains the Technical Specifications consistent with the Generic Letter guidance.

Sincerely,



G.L. Boldt, Vice President
Nuclear Production

GLB:REF:wla

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

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER)
)
FLORIDA POWER CORPORATION)

DOCKET NO. 50-302

CERTIFICATE OF SERVICE

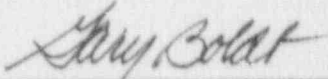
G.L. Boldt deposes and says that the following has been served on the Designated State Representative and Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,
Board of County Commissioners
of Citrus County
Citrus County Courthouse
Inverness, FL 32650

Administrator,
Radiological Health Services
Department of Health and
Rehabilitative Services
1323 Winewood Blvd.
Tallahassee, FL 32301

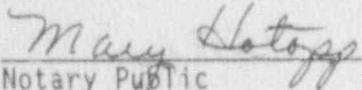
A copy of Technical Specification Change Request No. 165, Rev. 1, requesting Amendment to Appendix A of Operating Licensing No. DPR-72.

FLORIDA POWER CORPORATION



G.L. Boldt, Vice President
Nuclear Production

SWORN TO AND SUBSCRIBED BEFORE ME THIS 20th DAY OF FEBRUARY, 1991

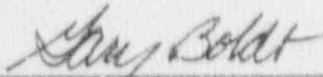


Notary Public

Notary Public, State of Florida at Large
My Commission Expires:

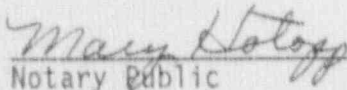
STATE OF FLORIDA
COUNTY OF CITRUS

G.L. Boldt states that he is the Vice President, Nuclear Production for Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.



G.L. Boldt, Vice President
Nuclear Production

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 20th day of February, 1991.



Notary Public

Notary Public, State of Florida at Large
My Commission Expires:

FLORIDA POWER CORPORATION
 CRYSTAL RIVER UNIT 3
 DOCKET NO. 50-302/LICENSE NO. DPR-72
 REQUEST NO. 165, REVISION 1
 FIRE SERVICE SYSTEM

A. License Document Involved: Technical Specifications

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DESCRIPTION OF REQUEST:

This submittal requests (1) corrections to the Remote Shutdown Monitoring Instrumentation Table for the location and measurement ranges of the steam generator level and reactor coolant temperature instruments, and (2) the deletion of the fire protection requirements from the Technical Specification delineated above.

REASON FOR REQUEST:

The steam generator level instrumentation location and measurement range, and the reactor coolant temperature instrument range as listed in the existing Technical Specification Remote Shutdown Monitoring Instrumentation Table, 3.3-9, are not current. The updated data for these instruments were not included in earlier Technical Specification Change Requests due to oversights during the preparation of the submittals. This request corrects these oversights on Table 3.3-9.

The removal of fire protection requirements from the Technical Specifications is requested in accordance with the suggestions in Generic Letter 86-10, "Implementation of Fire Protection Requirements", dated April 24, 1986 and Generic Letter 88-12, "Removal of Fire Protection Requirements from Technical Specifications", dated August 2, 1988. The Fire Protection Technical Specifications have been relocated to the Crystal River Unit 3 Fire Protection Plan; and the Fire Protection Plan, the Fire Hazards Analyses and fire protection program major commitments are referenced in the updated Final Safety Analysis Report (FSAR). A license condition amendment is also requested concurrent with this Technical Specification Change Request to provide for a change control process for the Fire Protection Program.

EVALUATION OF REQUEST:

The correction of the remote shutdown system steam generator level instrumentation location and measurement range in Table 3.3-9 will accurately reflect the existing configuration for Crystal River Unit 3 (CR-3). The measurement range of the level instrumentation allows for effective operator action associated with changes in the operating level of the steam generators during transient conditions. This request is consistent with FPC's submittal on remote shutdown capability previously accepted by the NRC staff by letters dated January 3, 1983 and July 3, 1985.

The correction of the measurement range for the reactor coolant temperature instrumentation will reflect the existing ranges for these instruments as installed on the Remote Shutdown Panel. The corrected instrument measurement range represents a wider temperature range for use by the operators during plant transients.

The original fire protection Technical Specifications were issued as Amendment No. 13 to the Facility Operating License No. DPR-72 for Crystal River Unit 3 on February 3, 1978. These requirements were added to the Technical Specifications in response to NRC correspondence dated September 30, 1976. The existing fire protection Technical Specifications included equipment and administrative requirements and the acceptable actions for exceeding a limiting condition for operation.

The removal of fire protection requirements from the Technical Specifications will remove those specifications that do not directly involve reactor control and safety; will remove those things that are not directly the responsibility of the operators; will improve the change process for Technical Specifications by reducing the number of requests for changes; and will meet guidelines established in Generic Letters 86-10 and 88-12 for control and changes to the Fire Protection Program.

The existing equipment and administrative control requirements have been incorporated into the Fire Protection Plan. A license condition is also requested to establish a change process for the Fire Protection Program.

The 10 CFR 50.59 process will be utilized as the control mechanism for the relocated specifications as the major commitments and program references have been placed in the FSAR. This would allow FPC to make changes to these specifications if the changes do not involve an unreviewed safety question. The control process for the Fire Protection Plan and implementing procedures which implement this program shall be in accordance with 10 CFR 50.59. Changes to the Plan and implementing procedures shall become effective after review and acceptance by the Plant Review Committee and the approval of the Director, Nuclear Plant Operations. The FSAR is updated annually pursuant to 10 CFR 50.71 and will reflect any changes to the Fire Protection Program specifications.

B. LICENSE DOCUMENT INVOLVED: Operating License

PORTION: 2.C (9) Fire Protection Schedule

DESCRIPTION OF REQUEST:

This submittal requests the replacement of the existing license condition concerning Fire Protection Program modification schedules with a statement of control for changes to the Fire Protection Program as suggested in Generic Letter 86-10, "Implementation of the Fire Protection Requirements," dated April 24, 1986.

REASONS FOR REQUEST:

The existing license condition required the establishment of schedules for completion of modifications identified by the NRC concerning the Fire Protection Program at Crystal River Unit 3. This license condition has been fulfilled and has no operational impact on CR-3. The proposed replacement license condition is consistent with Generic Letter 86-10 and will provide assurance that changes made that affect the ability to achieve and maintain safe shutdown will receive prior approval from the Nuclear Regulatory Commission.

EVALUATION OF REQUEST:

The existing license condition was imposed by Operating License Amendment No. 23 and required the establishment of modification completion schedules as stated in the July 29, 1979 Fire Protection Program Safety Evaluation Report issued by the NRC. The conditions of this amendment have been met and, therefore, the existing license condition can be removed with no impact on safety.

The proposed license condition will provide assurance that changes to CR-3 that affect the ability to achieve and maintain safe shutdown will receive prior NRC approval. The wording of the proposed license condition is consistent with the example license condition in Generic Letter 86-10. The control process for changes to the Operating License is in accordance with the established requirements in 10CFR50.90.

SHOLLY EVALUATION:

The proposed change to the Fire Protection requirements does not involve a significant hazards consideration. The removal of fire protection requirements from the Technical Specifications will remove those specifications that do not directly involve reactor control and safety; will remove those things that are not directly the responsibility of the operators; will improve the change process for technical specifications by reducing the number of requests for changes; and will meet guidelines established in Generic Letters 86-10 and 88-12 for control and changes to the fire protection program at Crystal River Unit 3.

Based on the above, it is concluded that this change will not:

1. Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated because the existing fire protection program requirements have been incorporated into the FSAR and site Fire Protection Plan, and, therefore, does not increase the probability of occurrence or consequences of previously evaluated accidents.
2. Create the possibility of a new or different kind of accident from any accident previously evaluated because this change is administrative in nature and is consistent with the guidance provided in Generic Letters 86-10 and 88-12. The requirements of the existing fire protection Technical Specifications have been incorporated into the FSAR and the site Fire Protection Plan.
3. Involve a significant reduction in a margin of safety because the existing requirements are maintained as a part of the Fire Protection Program and incorporated in the FSAR by reference.