

**Florida
Power**
CORPORATION

Crystal River Unit 3
Docket No. 50-302

January 31, 1991
3F0191-17

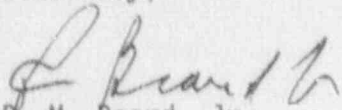
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Appendix J, Type B and C Testing Exemption/Relief Request

Dear Sir:

Florida Power Corporation (FPC) is submitting the attached exemption request (Attachment A) in accordance with the provisions of 10 CFR 50.12 for a one-time exemption from the surveillance frequency requirements of 10 CFR 50, Appendix J. This attachment includes a description of the exemption request, reason for the request, a justification explaining the special circumstances present, and FPC's conclusion. The Type C frequency requirements for Containment Isolation Valves are also addressed in the ASME Boiler and Pressure Vessel Code. Therefore, Relief Request No. 374 (Attachment B) requests a one-time extension of the surveillance requirements in the 1983 Edition of the ASME Code, Section XI, Subsection IWV-3422.

Sincerely,


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

PMB:LVC

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

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ATTACHMENT A

EXEMPTION REQUEST:

Florida Power Corporation (FPC) hereby submits a request in accordance with the provisions of 10 CFR 50.12 for a one-time exemption from the Type B and C test interval requirements of 10 CFR 50, Appendix J. This exemption will allow FPC to perform Type B and C testing of penetrations and containment isolation valves during the next refueling outage (Refuel 8) scheduled for October 1992.

The one-time exemption would apply to penetrations (including electrical penetrations) and isolation valves. These penetrations and isolation valves were individually leak tested during Refuel 7 (March through June 1990) in accordance with the requirements of Appendix J. The results of these tests were satisfactory.

REASON FOR REQUEST:

To meet the requirements set forth by 10 CFR 50, Appendix J (testing interval shall be no greater than two years), Crystal River Unit 3 (CR-3) will have to complete all Type B and C testing of penetrations and containment isolation valves by June 1992. Such testing needs to be performed during extended outages. CR-3's next refueling outage is scheduled for October 1992. Therefore, CR-3 is requesting an extension to allow performance of the required testing during this next refueling outage.

JUSTIFICATION:

It is FPC's position that the requested exemption is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security.

The special circumstances necessary to support an exemption required by 10 CFR 50.12 apply to this situation. A one-time exemption from the Type B and C testing frequency of Appendix J is requested on the following basis:

1. The intent of Appendix J is to allow Type C testing (containment isolation valves) testing to be performed during refueling outages. The reason for CR-3's request is to extend the test interval to coincide with the refueling outage. The current cycle for CR-3 is 29 months long.
2. The conditions of the components is not expected to change during the requested extension period. This extension period is relatively short in comparison with the two year test interval.
3. The Type B and C testing performed in Refuel 7 (1990) provided favorable results. The total measured leakage was 28,464 SCCM. This is approximately 10% of the total allowable for Types B and C leakage (.6La).

CONCLUSION:

This request is consistent with the criteria of Title 10 Part 50, Section 12(a)(2)(ii) and (v). Approval of this exemption would allow CR-3 to extend the surveillance interval for completion of the local leak rate tests required by 10 CFR 50, Appendix J until October 1992. Similar relief has been granted for TVA (Browns Ferry Plant), Carolina Power and Light (Brunswick Plant) and others.

ATTACHMENT B

FLORIDA POWER CORPORATION INSERVICE INSPECTION - PUMP AND VALVE PROGRAM CRYSTAL RIVER UNIT 3	RELIEF REQUEST # V-374 Page 1 of 1
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Reference Code: ASME Boiler and Pressure Vessel Code, Section XI, 1983 edition through summer 1983 addenda.

- I. Component for Which Exemption/Relief Is Requested:
 - a) Name and identification number (component tag): All Category A valves
 - b) Function: Various
 - c) ASME Section III Code Class: 1, 2.
 - d) Valve Category: A, A/C
- II. Reference Code Requirement That Has Been Determined To Be Impractical:
IWV-3422, Frequency. The requirement that Valve Leak Rate tests shall be conducted at least once every two years.
- III. Basis For Requesting Relief: The CR-3 Pump and Valve Program utilizes 10CFR50 Appendix J, Local Leak Rate Testing to fulfill the requirements of ASME Section XI IWV-3422 requirements.
 - The intent of Appendix J was to allow Type "C" testing (containment isolation valves) to be performed during refueling outages. CR-3 is requesting a one time extension of the test interval to coincide with the next scheduled refueling outage.
 - The condition of the components is not expected to change during the requested time period. This extension period is relatively short in comparison with the two year test interval.
 - The Type "C" testing performed during Refuel 7 (1990), provided favorable results with the measured leakage at approximately 10% of allowable leakage.
 - The integrity of the isolation valves leak tightness will be verified by a Type "A" test (Integrated Leak Rate) scheduled for October, 1991.
- IV. Alternate Examination: This is a one time request for extension of the two year test interval and as such, no alternate examination is intended.
- V. Implementation Schedule: The requirement of IWV-3422 will be re-implemented beginning with Refuel 8.