

Florida Power

CORPORATION

Crystal River Unit 3

Docket No. 50-302

February 7, 1991

3F0291-03

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

Subject: Licensee Event Report (LER) 90-015

Dear Sir:

This letter provides information relative to LER 90-015, "Decay Heat Valve Enclosures As Built Do Not Match FSAR Description". Since an investigation determined that a reportable nonconformance never occurred relative to this issue, an LER was never required. Therefore, rather than provide a supplement to the LER as originally intended, this letter report is being submitted.

On September 25, 1990, Crystal River Unit 3 personnel determined that the enclosures around the isolation valves (guard pipe) for the Reactor Building Sump recirculation lines to the Decay Heat pump suction did not match the description in the Final Safety Analysis Report (FSAR) as revised in June 1990.

On October 25, 1990, this event was reported by LER 90-015 as a potential operation outside the design basis under 10 CFR 50.73(a)(2)(ii). Florida Power Corporation (FPC) stated that it would continue to investigate this issue and report a final disposition in January 1991. The investigation showed that neither FPC, its architect/engineer, or the Nuclear Steam Supply System (NSSS) vendor intended the enclosures to be leak tight. The June 1990 revision to the FSAR was in error. The enclosure configuration did not constitute an operation outside the design basis and no reportable event occurred. The FSAR is being revised to reflect the correct description of the enclosures.

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
3F0291-03 - Page 2

On October 31, 1990 an Enforcement Conference was held with Region II personnel in Atlanta, Georgia. During this conference, the guard pipe issue was discussed. At that time, FPC satisfied the Region that there was no design basis issue involved with the guard pipes. The following information is paraphrased from the letter from Region II to FPC documenting the Conference and identified as NRC Inspection Report No. 50-302/32 dated November 7, 1990.

The revision to the FSAR was to add a definition of a Type II penetration (of the reactor containment building) with a single isolation valve. This had been previously undefined in the CR-3 FSAR, although the penetration configuration has been in place since original construction of the facility. Engineering research of this issue found the configuration was in compliance with the Standard Review Plan 6.2.4 and with ANSI N271-1976. The engineering response, however, incorrectly described the pipe as "leak tight". The FSAR was then revised to "match" the perceived plant configuration.

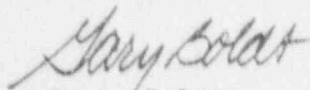
The ANSI Standard states:

"3.6.3 Single valve and closed system outside containment:
Single valve and piping between the containment and the valve shall be enclosed in a protective leak tight or controlled leakage housing to prevent leakage to the atmosphere."

The passage underlined is for emphasis. From this quote, it is evident that the guard pipe, designed and installed at CR-3, met the design basis. The error described above was made in developing information for the FSAR revision.

The submission of this additional information should facilitate timely closure of this issue.

Sincerely,



G. L. Boldt
Vice President
Nuclear Production

WLR:mag

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