

**Florida
Power**
CORPORATION

March 14, 1983
3F-0383-18

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
Attn: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Relief from ASME Section XI, Articles IWA-4210 and 4240

Dear Mr. Denton:

Presently Florida Power Corporation is required to perform examinations of Class 1, 2, or 3 systems per Section 4.0.5 of the Technical Specifications in accordance with the ASME Boiler and Pressure Vessel Code, Section XI, 1974 Edition through Summer 1975 Addenda. Included in these examinations are rules for modifications, replacements, additions, and alterations described in IWA-4240 and required pressure tests of repairs, modifications, replacements, additions, and alterations as described in IWA-4210.

The 1977 Edition through Summer 1978 Addenda clarifies the definitions of the Summer 1975 Addenda of IWA-4240 and reflects accepted industry standards for pressure tests of replacements. This Edition also contains a new article, IWA-7000, not presently contained in the 1974 Edition, which provides the necessary guidelines for the establishment of a well-defined program governing "Replacements" at Crystal River Unit 3.

Therefore, this letter requests that Florida Power Corporation be granted waivers from IWA-4210 and 4240, 1974 Edition through the Summer 1975 Addenda of Section XI to the ASME Code. In lieu of these requirements, we wish to adopt Subarticles IWA-4400 and 4600, and Article 7000 of the 1977 Edition through Summer 1978 Addenda of Section XI to the ASME Code. IWA-4210 and 4240 are considered impractical for use at Crystal River Unit 3 as they do not provide sufficient guidelines concerning repairs, modifications, replacements, additions, and alterations on which to establish an ISI Program.

A001
w/checkbox:
4000.00

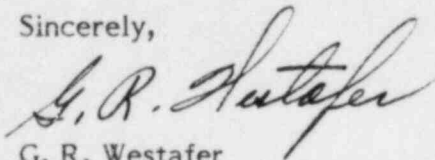
8303170319 830314
PDR ADOCK 05000302
PDR
Q

3F-0383-18
March 14, 1983

Florida Power requests that your response be included with previous Inservice Inspection Relief request responses scheduled to be issued by your staff on or about April 29, 1983.

Florida Power Corporation has determined that this relief request involves a Class III amendment, per 10CFR120.22, in that it involves a single safety issue. Accordingly, the fee of four thousand dollars (\$4,000.00) is enclosed.

Sincerely,



G. R. Westafer
Manager
Nuclear Licensing and Fuel Management

PGH/mm

cc: Mr. J. P. O'Reilly, Regional Administrator
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30303