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Docket No. 50-302

Mr. J. A. Hancock
Vice President, Nuclear Operations
Florida Power Corporation
ATTN: Manager, Nuclear Licensing
P. O. Box 14042, M.A.C. H-2
St. Petersburg, Florida 33733

Dear Mr. Hancock:

SUBJECT: EXEMPTION REQUEST - VESSEL HEAD VENTS

By letter dated October 12, 1982, Florida Power Corporation requested an exemption from certain requirements of 10 CFR 50.44(c)(3)(iii) for Crystal River Unit 3. Specifically, you requested relief from the requirement to install a reactor vessel head vent.

We have reviewed your exemption request and the information submitted with your May 10, 1982 letter which you referenced in the October 12, 1982 letter. We understand that you contend that a reactor vessel head vent is not required because noncondensable gases that might accumulate in the upper part of the reactor vessel can be vented safely using the hot leg high point vents only. We find, however, that the lack of integral system test data supporting your contention and the lack of a verified code capable of treating noncondensable gas in contact with steam-water mixtures prevents us from concluding that an exemption can be justified.

We believe that such an exemption can be justified only if the ability to safely vent noncondensable gas trapped under the vessel head using hot leg vents is demonstrated. We consider that an acceptable demonstration must be based upon either experiments conducted in an appropriate test facility to verify analytical methods and operating procedures or a simulator. The simulator, however, must be verified with appropriate integral system test data.

By letter to the NRC dated January 13, 1983, the Babcock and Wilcox Owners Group committed to participate in an integral system test program which you endorsed. The program definition still needs to be developed; and the letter indicates a schedule to begin testing during the first half of 1985. We believe that testing to demonstrate the ability to safely vent noncondensable gas in the vessel head can be performed acceptably in this facility, either in its present configuration or with the proposed modifications.

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A final determination for granting a full-term exemption must necessarily depend upon a successful demonstration. Therefore, only interim relief from the implementation schedule for head vent installation can be considered at this time. For the NRC to consider the granting of an exemption extending the implementation deadline, we require the following information:

1. A commitment to perform the necessary internal system testing which demonstrates the efficacy of your proposed method of noncondensable gas removal from the reactor vessel head.
2. A realistic schedule for the submittal of your evaluation of the test results which will verify analytical methods and operating procedures described herein.
3. A commitment that, prior to startup from the next scheduled refueling, the hot leg vents will have been installed and declared operable, procedures will be in place and operators will have been trained for using the high point vents to vent noncondensable gas trapped in the reactor vessel.
4. Your Safety Analysis regarding the interim use of the above procedures for a period of time needed to conduct and evaluate the necessary integral testing program results, but not less than four years.

Please reply in fifteen days from the date of this letter regarding your schedule for submitting the information requested.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P. L. 96-511.

Sincerely,

Original signed by
Darrell G. Eisenhut

Darrell G. Eisenhut, Director
Division of Licensing

cc:
See next page

*See previous 318B for concurrences.

no legal objection

D:DL
DEisenhut
2/2/83

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DATE	2/2/83	2/9/83	2/3/83	2/1/83	2/8/83	2/7/83	2/1/83

A final determination for granting a full-term exemption must necessarily depend upon a successful demonstration. Therefore, only interim relief from the implementation schedule for head vent installation can be considered at this time. For the NRC to consider the granting of an exemption extending the implementation deadline, we require the following information:

1. A commitment to perform the necessary integral system testing which demonstrates the efficacy of your proposed method of noncondensable gas removal from the reactor vessel head.
2. A realistic schedule for the submittal of your evaluation of the test results which will verify analytical methods and operating procedures described herein.
3. A commitment that, prior to startup from the next scheduled refueling, the hot leg vents will have been installed and declared operable, procedures will be in place and operators will have been trained for using the high point vents to vent noncondensable gas trapped in the reactor vessel.
4. Your Safety Analysis regarding the interim use of the above procedures for a period of time needed to conduct and evaluate the necessary integral testing program results, but not less than four years.

Please reply in fifteen days from the date of this letter regarding your schedule for submitting the information requested.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P. L. 96-511.

Sincerely,

Gus C. Lainas, Assistant Director
for Operating Reactors
Division of Licensing

cc:
See next page

AD:OR:DL
GLainas
2/ /83

OFFICE ▶	ORB#4:DL	ORB#4:DL/BS	C-ORB#4:DL	OELD	D:DSI	C:RSB:DSI
SURNAME ▶	RIngram	MFairtile;cf	JStolz		RMattson	BSheron
DATE ▶	2/2/83	2/3/83	2/3/83	2/ /83	2/8/83	2/7/83

cc w/enclosure(s):
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