DUKE ENERGY.

Crystal River Nuclear Plant
15760 W. Power Line Street
Crystal River, FL 34428
Docket 72-1035
Docket 50-302
Operating License No. DPR-72

Ref: 10 CFR 50.9

March 17, 2020
3F0320-01

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Crystal River Unit 3 - NRC Commitment Change Report – March 2020

Dear Sir:

The purpose of this letter is to provide notification of inactivations or modifications to regulatory commitments contained in previously docketed correspondence from Duke Energy Florida, LLC, (DEF), to the NRC. The attached report contains the Crystal River Unit 3 (CR-3) Nuclear Operations Commitment System (NOCS) reference numbers, source of the original commitment, statement of the original commitment, and justification for the inactivation. This report is being submitted in accordance with Nuclear Energy Institute (NEI) document NEI 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," dated July 1999.

Of the three hundred seventy-one CR-3 regulatory commitments that were modified or inactivated between January 1, 2018 and February 5, 2020, sixty modified or inactivated regulatory commitments met the NEI 99-04 criteria for NRC notification. There are no longer any active regulatory commitments for CR-3. Attachment 1 contains the NRC Commitment Change Report – March 2020.

No new regulatory commitments are made in this letter.

If you have any questions regarding this submittal, please contact Mr. Mark Van Sicklen, Nuclear Regulatory Affairs, at (352) 501-3045.

Sincerely,

Terry D. Hobbs
General Manager Decommissioning
Crystal River Nuclear Plant

TDH/bct

Attachment NRC Commitment Change Report – March 2020

xc: Regional Administrator, Region I
NMSS Project Manager

DUKE ENERGY FLORIDA, LLC

CRYSTAL RIVER UNIT 3

LICENSE NUMBER DPR-72

DOCKET NUMBER 50-302

DOCKET NUMBER 72-1035

ATTACHMENT

NRC COMMITMENT CHANGE REPORT – March 2020

Nuclear Operations Commitment System (NOCS) Number: 000034

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0580-02, dated March 2, 1980.

Original Commitment:

Following the February 26, 1980 incident at CR-3, FPC committed to implement the following procedural changes (include the following in procedures):
2. Surveillance procedures
B. Instrument Systems Power Supply and Function Switch Positions.

(Note 1: discussed with NOCS review board and A. Friend on 4-10-85 to ensure interpretation of commitment is correct and implementation was correct.)

(Note 2: SASS MAR-86-05-08-01 implemented during Refuel 8.)

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This change to the commitment is justified for several reasons:

This commitment is no longer required due to the decommissioning status of CR-3. The ICS system has been abandoned under DTO AR 690649. Also, there are no surveillance procedures that rely on instrumentation or power supplies. The plant is in dry dormancy with all spent fuel in dry storage. With the exception of rudimentary utilities (lighting, ventilation, communication, video surveillance, and water management equipment) provided for purposes of monitoring and occasional (infrequent) building entries, no equipment or systems are in operation in the plant.

Nuclear Operations Commitment System (NOCS) Number: 000091

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0684-03, dated June 11, 1984.

Original Commitment:

Two analyses were deferred from the "six-month" effort to be included in the "nine-month" work scope. FPC (via Stone & Webster Engineering Corporation) has completed these analyses and has transmitted them under separate covers (11/23/83).

A) potential drop of spent fuel divider gate
1. FPC will prohibit the movement of the spent fuel pool divider gate until after fifty (50) days following transfer of spent fuel to the spent fuel pools.
2. Only spent fuel shall be placed in the vicinity of the gate handling areas.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change):

Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 001046

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F1280-08, dated December 15, 1980.

Original Commitment:

From 3F1280-08 enclosure 2 page 3 (NUREG-0737 Item I.C.6): With regard to verifying correct performance of operating activities, FPC reviews and revises plant procedures as part of an on-going program to assure that an effective system of verifying the correct performance of operating activities is provided as a means of reducing human error and improving the quality of normal operations.

Note:
Compliance to the above commitment was mandated by NRC order in letter 3N0781-08.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required because it became an obligation when the NRC order mandated compliance in 1981. (Ref NRC to Crystal River Unit 3 (CR-3) letter, 3N0781-08, dated July 10, 1981.) Per NEI 99-04, requirements and obligations do not require treatment as regulatory commitments. Also, this commitment is no longer required due to the decommissioning status of CR-3. The use of periodic procedure reviews to improve human performance was mandated to assure that non-frequent or complex activities were correctly performed to minimize the possibility of accidents or transients developing from normal operations. The plant is in dry dormancy with all spent fuel in dry storage. CR3 no longer performs complex activities and there are no activities performed that could lead to accidents or plant transients leading to the unplanned release of radiation. Additionally, Procedure Use and Adherence and pre-job brief, are human performance tools in use today that identify HU issues with procedures that could impact performance of the activity.

Nuclear Operations Commitment System (NOCS) Number: 001576

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F1081-05, dated October 6, 1981.

Original Commitment:

FPC commits to performing nondestructive examination of certain special lifting devices prior to use, in accordance with ANSI 14.6.

Note: see detailed commitments under ANSI N14.6.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. This commitment was made as part of the NUREG0612, six-month response. Later we modified this commitment to allow NDE to be performed after completion of refueling activities, not before use. The intent of NUREG 0612 was to assure heavy loads would not be dropped onto nuclear fuel or SSC needed to assure safe shutdown of the reactor. With CR3 in a cold and dark condition, there is no need to maintain this commitment for special lifting devices in the reactor building, because there are no design functions left in that building. This commitment is not required as refueling activities are no longer performed at CR3 and NUREG 0612 no longer applies to the special lifting devices in the reactor building.

Nuclear Operations Commitment System (NOCS) Number: 001596

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, F0682-17, dated June 15, 1982.

Original Commitment:

With regard to training procedures described in NUREG-0612, FPC commits to developing the program for training, qualification, and conduct of Crane Operators in compliance with the requirements of ANSI B30.2 - 1976. (from letters 3F0682-17 page 3 & 3F0981-02 page 8-1)

FPC commits to change and maintain procedures to incorporate any necessary training with regard to NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants". (from letters 3F0581-06 & 3F0781-07).

As a result of FPC's effort to meet the guidance of NUREG-0612, FPC initiated in September 1981, an intensive training program for crane operation, part of which are PRC approved. No one is allowed to operate a crane without having this training. The training program includes an annual classroom requalification. (from letter 3F1184-04 - 11/21/84).
Note:
See NRC Safety Evaluation Report (SER) attached to letter 3N0784-18, paragraphs 2.1.4.a & 2.2.3.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 001597

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, F0682-17, dated June 15, 1982.

Original Commitment:

With regard to spent fuel shipping casks described in NUREG-0612, "Control of Heavy Loads," FPC commits to the following

FPC will develop procedures in compliance with NUREG-0612 for handling spent fuel shipping casks.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 001702

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, F0581-06, dated May 14, 1981.

Original Commitment:

With regard to NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants," FPC commits to implement the new/revised procedures applicable to the NUREG.

Note:
See NRC Safety Evaluation Report (SER) attached to letter 3N0784-18.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 001715

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, F0682-17, dated June 15, 1982.

Original Commitment:
From letter 3F0682-17:
A list of procedures applicable to NUREG-0612 is presented in attachment 1. A typical CR-3 procedure for crane operation will contain the following information.

1) a description of the overhead handling system to be used including the type of crane, its rating, type of drive units, type of hoists, controls, and the applicable limit switches and wheel stops;
2) references to other applicable procedures;
3) the limits and precautions for handling particular loads;
4) setpoints;
5) general crane operating procedures describing handling of the bridge travel, trolley travel, and hoist motion, the use of appropriate hand signals, and procedures for preoperational checkout and visual inspection;
6) post-operational checkout procedures;
7) design data, including maximum loads and equipment speeds;
8) attachments including a crane load matrix and safe load path sketches.

NOTE:
See NRC Safety Evaluation Report (SER) attached to 3N0784-18 paragraph 2.1.3.A on page 10.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 001866

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F1081-05, dated October 6, 1981.

Original Commitment:

With regard to NUREG-0612 which requires that the main hook/line block be considered a heavy load, FPC commits to the following:

During periods when the main hook is not in use and is prevented from being inadequately raised, FPC will not consider it a heavy load. At all other times, it will be treated as a load and safe load paths, etc. will apply.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 002194

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F1183-03, dated November 4, 1983.

Original Commitment:

2.2.2 Equipment Classification and Vendor Interface:

The following is a brief description of the current practice for vendor updates to instruction manuals. Several procedures exist which establish the responsibilities for technical evaluation, distribution and retention of this type of data. The nuclear procurement and storage manual establishes the requirements for obtaining vendor support data as part of the procurement process. The Nuclear Engineering Procedures Manual stipulates the requirements for engineering evaluation of vendor data, and along with the Fossil Engineering Procedures Manual, (now Fossil Operations Engineering Guidelines), they they provide requirements for distribution and retention.

The existing practice is based on pertinent vendor data being sent to the Nuclear Engineering Department either from the vendor or by interdepartment transmittal. Nuclear Engineering reviews this information for technical content and applicability to CR-3. The relevant information is then transmitted through Document Control via a document transmittal sheet.
Document control then distributes copies and any special instructions.

These updates have been stamped as the next revision level and are inserted in the various instruction manuals. The current practice is to use manufacturer's manuals as a reference only and to perform the work on Safety-Related equipment in accordance with approved plant procedures.

Note: AI-407, 4.3, provides clarification for use of technical manuals as procedures.

Note: the NPSM has been replaced by MCP-NGGC-0401.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. With the plant in cold and dark, there are very few SSC remaining that this (Generic Letter 83-28) would apply to as the intent was to assure that Safety Related SSC and the associated vendor information were kept up to date for operability concerns. There are no safety related SSC remaining at CR3. There are few SSC that still have applicable vendor Manuals but are not considered to have a safety function.

Nuclear Operations Commitment System (NOCS) Number: 002923

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, F0986-29, dated September 30, 1986.

Original Commitment:

A human factors procedure will be established to evaluate control room design changes subsequent to the DCDR. The procedure will contain the guidelines related to panel layout, controls, visual displays, and labels and location aids. This document will be maintained by the FPCV Nuclear Operations Engineering Department.

Projects which require minor changes to the control board will be performed utilizing the human factors procedure within the structure of the engineering program.

Projects which require major changes to the control board will require the use of outside human factors consultants. Such projects will be led by an appropriate staff member from the FPC Nuclear Operations Engineering Department.

Note: To be made active when control room modifications are complete as specified in 3F0986-29.

Note: Specification SP-5145 contains the information and controls required by Paragraph 1 above. NEP 212 requires all modifications to consider human factors design considerations for the control room as a design input via all MARS and if applicable, invokes the guidelines established in SP-5145.

Note: NEP-212 information has been incorporated into NEP-210.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The commitment was incorporated in engineering design procedures, but is no longer relevant in the current status of CR3 decommissioning. The Control Room has been abandoned. The only future changes to equipment within the power block will be decontamination and dismantlement. Therefore, this commit no longer has any relevance to CR3 and can be inactivated.

Nuclear Operations Commitment System (NOCS) Number: 006750

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device:
FPC shall verify by scheduled periodic testing that the special lifting device continues to meet its performance criteria and continues to be capable of reliable and safe performance of its functions, and providing a system that indicates the date of expiration of the validity of the test.

Note: Refueling procedure control SLD inspection between the SP-601 inspections.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006751

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device:
FPC shall provide an operating procedure for the use of the special lifting device outlining proper use and maintenance, and noting any limitation to its use.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006752

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device:
FPC shall identify subparts or subassemblies that may be replaced because of wear or damage.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006753

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device:
FPC shall mark each special lifting device with its load limit as established by acceptance testing and with any other limitation on its use such as minimum temperature.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006754

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device:
FPC shall maintain a full record of the history of a special lifting device or component, including documentation of required testing, all uses of the device, any incidents in which the device or any of its parts may have been loaded beyond the loads for which it was qualified, damage distortion, replacement, repair, alterations, and inspections.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006755

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device:
FPC shall remove from service any special lifting device or component for which the period of test validity has expired, which has experienced any incident causing doubt as to its continuing compliance, or which has been damaged.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006756

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device:
Each special lifting device shall be subjected to either of the following prior to use or at each refueling outage:
(1) A load test equal to 150% of the maximum load to which the device is to be subjected. After sustaining the test load for a period not less than 10 minutes, critical areas, including major load-bearing welds, shall be subjected to visual inspection for defects, and all components shall be inspected for permanent deformation.
(2) In cases where surface cleanliness and conditions permit, the load testing may be omitted, and dimensional testing, visual inspection, and nondestructive testing of major load-carrying welds and critical areas in accordance with section 5.5 of this standard shall suffice. If the device has not been used for a period exceeding one year, this testing shall not be required. However, in this event, the test shall be applied before returning the device to service.

Note 1: for the reactor head and internals lifting device refer to commitment #00102 in lieu of this commitment.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006757

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device testing:
The load testing prescribed in section 5.2.1 of ANSI 14.6 shall also be repeated prior to use following any major maintenance or alteration. Major maintenance or alteration is defined as a repair or design change in which load-bearing members are subjected to heating above 300F (150C), removal of significant quantities of metal, welding other than for surface repair, or plastic deformation of metal.

Note: section 5.2.1 of ansi 14.6 requires the following:
Prior to its initial use, each device shall be subjected to a load test equal to 150% of the maximum load to which the device is to be subjected. After sustaining the load for a period of not less than 10 minutes, critical areas, including all load-bearing welds, shall be subjected to nondestructive testing in accordance with 5.5 of ANSI 14.6.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006758

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device testing:
The load testing prescribed in section 5.2.1 of ANSI 14.6 shall be performed following any incident in which any of the load-bearing components of the special lifting device may have been subjected to stresses substantially in excess of those for which it has been qualified by previous testing, or following an incident that may have caused permanent distortion of its load-bearing parts.

Note: section 5.2.1 of ANSI 14.6 requires the following:
Prior to its initial use, each device shall be subjected to a load test equal to 150% of the maximum load to which the device is to be subjected after sustaining the load for a period of not less than 10 minutes, critical area, including all load-bearing welds, shall be subjected to nondestructive testing in accordance with 5.5 of ANSI 14.6.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006759

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device testing:
The functional testing prescribed in section 5.2.3 shall be repeated prior to use or each refueling outage.

Note: section 5.2.3 of ANSI 14.6 requires the following: Non-load-bearing functioning parts shall be tested according to written procedures prior to initial use to verify that they perform according to their purpose.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006760

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device testing:
The functional testing prescribed in section 5.2.3 of ANSI 14.6 shall be repeated following any incident in which repairs or alterations have been required on non-load-bearing functioning components or in which the special lifting device has suffered distortion.

Note: section 5.2.3 of ANSI 14.6 requires the following:
Non-load-bearing functioning parts shall be tested according to written procedure prior to initial use to verify that they perform according to their purpose.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006761

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device testing:
Special lifting devices shall be visually inspected by operating personnel for indications of damage or deformation prior to each use.

Note: refueling procedures control sld inspection in between sp-601 intervals.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006762

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device testing:
Special lifting devices shall be visually inspected by maintenance or other nonoperating personnel prior to use or at each refueling outage for indications of damage or deformation.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006763

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device testing:
Each special lifting device shall be tagged or the record system updated after testing, indicating the expiration date of the validity of that test.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006764

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0981-02, dated September 2, 1981.

Original Commitment:

Reactor head and internals lifting device:
Welding, fabrication, heat treatment, testing, and inspection procedures and qualifications involved in repair or alteration of special lifting devices shall be in accordance with the design specification. If no special requirements for repair or alteration are provided in the design specification, these operations shall be governed by the same requirements applying to the original fabrication. Defective bolts, studs, and nuts shall be replaced rather than repaired.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006765

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F1081-05, dated October 6, 1981.

Original Commitment:

Reactor head and internals lifting device – Nondestructive Testing:
Inspections utilizing liquid penetrant or magnetic particle examination shall be performed by written procedures and by personnel, both qualified in accordance with the rules in the current edition of ASME Boiler and Pressure Vessel Code, Section V, Articles 1, 6, 7, 24, and 25.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 006766

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F1081-05, dated October 6, 1981.

Original Commitment:

Reactor head and internals lifting device – Nondestructive Test:
Liquid penetrant and magnetic particle acceptance standards shall be as indicated in paragraphs NF-5350 and NF-5340 of the current edition of ASME Boiler and Pressure Vessel Code, Section III, Division 1.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, and 6766 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. Any use of cranes or special lifting devices in the reactor building in the future will be procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant.

Nuclear Operations Commitment System (NOCS) Number: 007205

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, F0981-02, dated September 2, 1981.

Original Commitment:

Crane replacement parts shall be at least equal to the original manufacturer's specifications.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. All cranes are abandoned. There is no safety related equipment, safe shutdown trains or reactor accidents at CR3 due to the state of decommissioning. There is no fuel in the reactor vessel or the spent fuel in the spent fuel pool nor is there nuclear fuel in the new fuel vault. The only heavy loads in the future will be due to decontamination and demolition. Any cranes used in the future will be rented and not owned by CR3 or it will be the responsibility of any potential future license holder to address the ability of the abandon cranes to be restored to service in accordance with all regulatory requirements for their intended use. Regardless, there will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. This commitment no longer has any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 007212

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, F0981-02, dated September 2, 1981.

Original Commitment:

From letter 3F0981-02 page 6-1:
The FPC crane inspection, testing and maintenance procedures meet the intent of ANSI B30.2-1976, chapter 2-2.

From ANSI B30.2-1976:
Crane repairs or repl. Shall be made as needed.

Note:
The above commitment was credited by the NRC in 3N0784-18, page 16 of the SER report from Franklin Research Center, Section 2.1.7.A.

Note:
Satisfying the requirements of NUREG-0612 via 3F0981-02 is stated in FSAR section 9.6.1, rev 26.1.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 007233

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, F0981-02, dated September 2, 1981.

Original Commitment:
Each of the heavy loads defined for the auxiliary building crane is controlled administratively by the crane operating procedure, "Operation of The Auxiliary Building Crane," which identifies the
1) loading bay hatch cover;
2) spent fuel cask (loaded);
3) new fuel shipping cask (loaded-2 assemblies);
4) new fuel assemblies;
5) missile shield handling fixtures (SFMS);
6) load hoisted from loading bay to operating deck;
7) loads on missile shields above Spent Fuel Pool B after transferral by missile shield crane from Spent Fuel Pool A area;
8) crane main hoist bottom block and hook;
9) crane auxiliary hoist bottom block and hook;
10) new fuel pit missile shields with SFMS;
11) new control component container;
12) new control component;
13) spent fuel cask pit gate;
14) spent fuel pool missile shields;
15) new fuel elevator and associated equipment.

(Note: item 9 is not a heavy load, according to nureg-0612 definition.)

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:
Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 007235

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, F0981-02, dated September 2, 1981.

Original Commitment:

Handling of the heavy loads defined for the spent fuel pool missile shield gantry crane and the spent fuel pool gate hoist is governed by applicable surveillance and refueling procedures and by the crane and hoist operating procedure, "Operation of Miscellaneous Cranes And Hoists," which defines load handling paths. The defined heavy loads for these lifting devices is:
1) Spent Fuel Pool Missile Shields A through P with SFMS;
2) items in Spent Fuel Pit A Area;
3) Spent Fuel Pool A-B Gate.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 009831

Source Document:

Crystal River Unit 3 (CR-3) to NRC letters, 3F1282-02, dated December 1, 1982, 3F1183-21, dated November 23, 1983.

Original Commitment:
From 3F1282-02 page 2 and change by memo OP99-0135:
Similar administrative controls will be used to control heavy loads in other critical areas. During a refueling outage (or other major outages) an SRO, or his designee, will be present in the auxiliary building to supervise and coordinate operations. The SRO, or his designee, will be familiar with NUREG-0612 requirements and aware of safe load handling practices. All lifts involving FHCR-5 or FHCR-7 will be approved by an SRO or his designee prior to the lift. There is only one load path available to SFHT-7; therefore, these administrative controls will not be applied to this crane.
Note:
An SRO/designee will approve lifts associated with FHCR-5 & FHCR-7. See NOCS 1714 for reactor building lift approval.

From 3F1183-21 dated 11/23/83:
Any temporary or mobile cranes, such as truck cranes and cherry pickers, operating in an area over safety-related equipment will be administratively controlled to preclude operation outside the guidelines of NUREG-0612.831.
This NOCS was modified under NTM 669692-95 in accordance with CP-252 and REG-0110. PAR 1/20/16. This NOCS was previously inactivated but returned to active status and modified as previous justification was only sufficient to remove a portion of the commitment.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:
Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 009832

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F1282-02, dated December 1, 1982.

Original Commitment:

From Letter 3F1282-02 and as changed by Memo NOMO00-0005:
The maintenance supervisor or his designee in charge of the work will approve all lifts involving CWCR-1. The maintenance supervisor will be aware of NUREG-0612 requirements concerning CWCR-1 and will assure his designee is similarly informed.

Note:
Letter 3F1282-02 provided input to the NRC's safety evaluation report (SER) attached to 3N0784-18 for NUREG-0612; however, this commitment was not credited in the SER.

Note:
The above commitment is a change approved in Memo NOMO00-0005. The original commitment was made in letter 3F1282-02 page 2.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 009834

Source Document:
Crystal River Unit 3 (CR-3) to NRC letter, F1282-02, dated December 1, 1982.

Original Commitment:
Lifting devices (not specially designed) the results of an FPC evaluation of dynamic loads revealed that if a compensation factor of 1/2% of the static load/ffm crane hook speed is incorporated into the sling rating, a sufficient margin of safety will be attained. The hook speeds for non-exempt cranes at Crystal River Unit 3 are as follows:

Spent Fuel Pool Missile Shield Crane	FHCR-7	16.2 Ft/Min
Fuel Handline Area Crane	FHCR-5	4.8 Ft/Min
Intake Gantry Crane	CWCR-1	14.3 Ft/Min
Reactor Building Crane	RCCR-1	4 Ft/Min
Reactor Vessel Tool Handling Jib Crane	RCCR-2	27 or 9 Ft/Min
Spent Fuel Pool Gate	SFHT-7	16.6 Ft/Min

RCCR-2 has a high-speed switch for its 27 ft/min speed. The high-speed switch will be disconnected to minimize the effects of dynamic loading during lifts performed by RCCR-2. Based on this data and the FPC evaluation, all slings and other special lifting devices not specially designed have been derated by 10% to compensate for dynamic loading. (Note: See MAR-86-01-04-01 for RCCR-2 commitment closure per J.K.)

Note: When determining rigging requirements for non-engineered lifts, over-rig by 15% additional capacity instead of derating by 10% to compensate for dynamic loading. This is more conservative than the derating by 10% and meets the intent of NOCS 9834. (this note was added in accordance with REG-NGGC-0110 and NTM 256002-15 on 01/20/2009.)

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:
Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 030100

Source Document:

Crystal River Unit 3 (CR-3) to NRC letters, 3F0680-29, dated June 25, 1980, and 3F1080-25, dated October 14, 1980.

Original Commitment:

From letter 3N0580-25 action item 2:
Establish a routine sampling/analysis or monitoring program for these systems in order to promptly identify any contaminating events which could leak to unmonitored uncontrolled liquid or gaseous release to the environment, including releases to on-site leaching fields or retention ponds.

Response in 3F1080-25, and changed via memo CR00-0093:
A monitoring program has been established and proceduralized to identify contaminating events which could lead to unmonitored, uncontrolled liquid or gaseous releases to the environment, including releases to on-site leaching fields or retention ponds.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 30100 and 100478 are no longer required due to the decommissioning status of CR-3. There are no more radioactive fluid systems in the plant that could leak into non-contaminated systems. Gaseous releases from evaporation of sump water will be monitored at the exhaust on the back berm. The need to sample for cross contamination also has no significant effect on the ability of a SSC to perform its design function. Any unmonitored release would be bounded with a conservative release to compare against ODCM limits. The process of accountability after an attack has no impact on any SSC or design function. The security team on shift are usually the only ones with in the protected area. Accountability for the protected area is simple. Accountability for personnel outside of the protected area can occur but is at the discretion of the EC, and all personnel are trained in reporting to the muster point in the event of an evacuation. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 040238

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0805-01, dated August 15, 2005.

Original Commitment:

Instrument Air System verification:

Emergency operating procedures for loss of instrument air transients will be developed. The procedures will follow the philosophy of the existing symptom based abnormal procedures.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 400238 and 400239 are no longer required due to the decommissioning status of CR-3. The Instrument air system was abandoned and the plant is in a cold and dark condition. Procedures and training to support this system are no longer necessary. The removal of a commitment to have procedures and training related to the Instrument Air system will not negatively impact any safety function for a safety related or important to safety SSC as there are no safety related SSC at CR3 anymore and instrument air is not available to the ISFSI, where important SSC remain. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 040239

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0289-02, dated February 9, 1989.

Original Commitment:

Instrument Air System verification:

Lesson plans will be developed for operator and maintenance personnel training on instrument air related events. The training will include system function and interfaces, normal operations, transient events and recovery from a system failure other training programs lesson plans will be updated as appropriate to include a section on the importance of the instrument air system.

Note: deleted reference to GET from letter as the information presented by this B&W OG recommendation is primarily for use by B&W plants who use instrument air for pneumatic tools. At CR-3, we primarily use station air and even though these systems interconnect with other procedures in place, this would not occur.

Note: Maintenance personnel will be trained on a SAT evaluation of responsible tasks.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 400238 and 400239 are no longer required due to the decommissioning status of CR-3. The Instrument air system was abandoned and the plant is in a cold and dark condition. Procedures and training to support this system are no longer necessary. The removal of a commitment to have procedures and training related to the Instrument Air system will not negatively impact any safety function for a safety related or important to safety SSC as there are no safety related SSC at CR3 anymore and instrument air is not available to the ISFSI, where important SSC remain. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 062199

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0889-14, dated August 25, 1989.

Original Commitment:

Radiation Monitoring instrumentation shall be demonstrated operable as follows:
1. Area Monitors
   a. Fuel Storage Pool area
      i. Criticality Monitor

Requirement: channel check
Frequency: at least once per 12 hours
Mode(s): with fuel in the storage pool or building

Note: the material addressed within this commitment was previously contained in the CR-3 Technical Specifications (TS). It was removed from TS during implementation of the Improved Technical Specifications (Amendment 149). FPC has committed to retain this activity, with the understanding that changes to the commitment can and will be processed in accordance with the CR-3 Administrative Instruction for implementing 10 CFR 50.59. Reference FPC to NRC letter 3F0889-14, dated august 25, 1989 and in the inactive file reference commitment #00528.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:
Applicability is while fuel is in Spent Fuel Pool. By letter (3F0118-02) dated 1/15/18, no fuel remains in Spent Fuel Pool.

This commitment is no longer required due to the decommissioning status of CR-3. The RM system has been abandoned. The plant is in dry dormancy with all spent fuel in dry storage.

Nuclear Operations Commitment System (NOCS) Number: 062251

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0889-14, dated August 25, 1989.

Original Commitment:

TO ENSURE DESIGN BASIS FLOWS ARE OBTAINED, THE PREFERRED METHOD OF POSITIONING THROTTLE VALVES IS BY COUNTING THE NUMBER OF TURNS OPEN FROM
THE FULL CLOSED POSITION.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

RM-L3 has been abandoned under DTO AR 682805 and ODCM was revised to remove this.

This commitment is no longer required due to the decommissioning status of CR-3. The RM system has been abandoned. The plant is in dry dormancy with all spent fuel in dry storage.

Nuclear Operations Commitment System (NOCS) Number: 062361

Source Document:

SPIP/BAW 1919, Appendix M, RTS BW #47-1163743-25.

Original Commitment:

Run times of the compressors in the TVA Bellefonte Instrument Air systems should be observed during startup to ensure that one compressor does not run excessively. Run time between the compressors should be kept about the same.

IOC dated 3/30/90 states that SP-306 has been generated to equilibrate run times for equipment which includes the instrument air compressors.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The IA system has been abandoned. The plant is in dry dormancy with all spent fuel in dry storage. This commitment came from recommendation for B&W plants based on an industry event. The recommendation was related to use of Instrument Air for safety related equipment. EC 406615 shows no safety related equipment remains. Recommendation of maintaining equal run time is no longer required.

Nuclear Operations Commitment System (NOCS) Number: 062401

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F1195-06, dated November 17, 1995. LER 95-0022

Original Commitment:

To ensure design basis flows are obtained, the preferred method of positioning throttle valves is by counting the number of turns open from the full closed position.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. With fuel removed from spent fuel pool, there no longer exists a design basis flow requirement through throttle valves. No future modifications will create any such situation since there are no longer design basis accidents that require any plant equipment. Ref EC 406615.

Nuclear Operations Commitment System (NOCS) Number: 062597

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0997-12, dated September 5, 1997.

Original Commitment:

From 3F0997-12 (final response to Generic Letter GL 96-01):
In LER 97-003-05, FPC committed to specific actions to prevent recurrence, including revision of training programs, revision of engineering and procedure development procedures, and training.

From memo PROG97-0259:
Maintain in Exhibit C the requirement to perform designs considering the requirements of Generic Letter 96-01. In particular the need to design "testable" circuits for systems that have Improved Technical Specification testing requirements. References: Generic Letter 96-01, the NRC workshop on Generic Letter 96-01 questions and answers and Letter PROG97-0141.

Note:
The action from PROG97-0259 is a method of meeting the commitment in 3F0997-12 for revision to engineering procedures.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. GL 96-01 requested the following: 1) Compare electrical schematic drawings and logic diagrams for the Reactor Protection system, EDG load shedding and sequencing, and actuation logic for the engineered safety (ES) features systems against plant surveillance test procedures to ensure that all portions of the logic circuitry are adequately covered in the surveillance procedures to fulfill the technical specifications requirements. 2) Modify the surveillance procedures as necessary for complete testing to comply with the technical specifications.

In the current state of decommissioning of CR3, there are no safety related systems, no active Reactor Protection system, the EDGs are abandoned as are the ES systems. The Technical Specifications to which the commitment refers are no longer applicable to CR3. Consequently, this commitment is no longer relevant to CR3.

Nuclear Operations Commitment System (NOCS) Number: 062743

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0497-14, dated April 23, 1997.

Original Commitment:

Instruments used to satisfy technical specification surveillance requirements that are outside their calibration interval will be declared 'out of service' and will not be used.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. License Amendment 255 removed all Tech Spec Surveillance Requirements from the Part 50 license. This condition can no longer occur.

Nuclear Operations Commitment System (NOCS) Number: 062765

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0398-18, dated March 24, 1998.

Original Commitment:

Surveillance procedure have been revised to add inventory check of the EOP/AP Key Box, Tool Boxes, and Ladders.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage.

Note: The justification at the time of the commitment change (2/5/2018) was as follows: With removal of Spent Fuel from the Spent Fuel Pool, the only remaining APS are for a loss of power (AP-770) and fire (AP-880). Neither of these require equipment from EOP boxes. Fire Equipment is maintained under the 10 CFR 50.48(f) program.

Nuclear Operations Commitment System (NOCS) Number: 062800

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0398-16, dated March 30, 1998.

Original Commitment:

During rounds, operators are expected to carry necessary keys and a flashlight to assist in space/equipment inspections.

Note: reference NOTES Assignment 27966.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. Based on condition of the plant, there are no actions that would require an immediate response by the operations department to prevent an accident or release.

Nuclear Operations Commitment System (NOCS) Number: 062803

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F1196-05, dated November 15, 1996.

Original Commitment:

From letter 3F1196-05 page 7:

> Procedure MP-125 will be revised to specify the order of equipment installation/removal. For example, the 6" drain line flange and 4" strainer/sieve in the drain line to the reactor building sump must be installed before the fuel transfer covers are removed. Likewise, the covers must be installed before the 6" flange and 4" sieve are removed.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. This commitment was in response to NRC safety enhancement back-fit analysis for the operations of the spent fuel pools. The concern was the transfer tubes would be opened and spent fuel pool inventory drained through the 6 and 4 inch drains, uncovering fuel.

The plant is permanently shut down, fuel removed, de-energized and in dormancy layup. All fuel has been removed from the spent fuel pool and safely placed in dry storage, the racks are removed and the spent fuel pool has been drained. Consequently, this commitment is no longer relevant to CR3.

Nuclear Operations Commitment System (NOCS) Number: 062815

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0498-22, dated April 10, 1998.

Original Commitment:

From letter 3f0498-22 (notes 27991):

> Provide proper documentation of spurious operation criteria in the Topical Design Basis Document (TDBD).

Note 1: See attachment B in 3F0498-22-01.
Note 2: The completion of this commitment was documented 6/8/1998 in IOC/Letter PROG98-0136.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. This commitment was associated with the Appendix R fire and spurious operation of equipment required for plant shutdown. These fires affected the function of control switches, possibly from the control room or remote shutdown circuits, yielding potential spurious equipment actions.

The plant is permanently shut down, defueled, and placed in dormancy with permanent electrical energy de-energized in accordance with the fire plan. The fire induced spurious effects on safety related equipment ability to place the plant in cold shutdown from the control room or the remote shutdown panel are not possible with the plant permanently defueled and in dormancy conditions. Consequently, this commitment is no longer relevant to CR3.

Nuclear Operations Commitment System (NOCS) Number: 097923

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0592-06, dated May 8, 1992.

Original Commitment:

Title: Balance Shift Staffing

Procedure AI-500, Conduct of Operations, includes the requirement for a balance in shift staffing under "Responsibilities" of the Manager Nuclear Plant Operations. These requirements specifically address consideration of experience levels, personnel behavioral compatibility, and overall management styles in achieving a cohesive operating team.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. Balance of shift staffing was implemented as a corrective action for numerous reactor trips in December 1991. This was due to the complexity of the operating plant and allowed for a somewhat equal level of knowledge of previous plant experience among each shift. Due to the nature of the current plant, previous experience is moot as most operating equipment is relatively new and implications from equipment failure or an event are minimal.

Note: NOCS 097923, 097933, and 097935 were made as part of the corrective action evaluation process resultant from a Plant Trip in December 1991 due to inappropriate operator actions. The associated letter for these commitments discuss the violations that were assessed from this trip. These commitments were not used to restore compliance with the regulatory obligation which were described in a separate portion of the associated letters.

Nuclear Operations Commitment System (NOCS) Number: 097933

Source Document:

Crystal River Unit 3 (CR-3) to NRC letters, 3F0592-06, dated May 8, 1992 and 3F0992-06, dated September 9, 1992.

Original Commitment:

Title: develop questioning attitude

Developing a "questioning attitude" has been proceduralized in AI-500, Conduct of Operations, by establishing a general responsibility for all operations personnel to develop and maintain a questioning attitude. AI-501 assessment will be utilized to stress a questioning attitude as part of the management overview.

Note: The topic covered in AI-501 has been relocated to AI-1851, enclosure 2.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. Similar to shift staffing above, this NOCS was implemented as a corrective action related to reactor trip. In the current state, the implications of equipment failure, or incorrect actions by plant personnel have little impact.

Note: NOCS 097923, 097933, and 097935 were made as part of the corrective action evaluation process resultant from a Plant Trip in December 1991 due to inappropriate operator actions. The associated letter for these commitments discuss the violations that were assessed from this trip. These commitments were not used to restore compliance with the regulatory obligation which were described in a separate portion of the associated letters.

Nuclear Operations Commitment System (NOCS) Number: 097935

Source Document:

Crystal River Unit 3 (CR-3) to NRC letters, 3F0592-06, dated May 8, 1992 and 3F0293-05, dated February 2, 1993.

Original Commitment:

From letter 3F0992-06 page 10 of the attachment:

Item F3: emphasize use of annunciator response procedures

Criteria regarding use of annunciator response procedures is included in AI-501, Assessments and in AI-500, Conduct of Operations.

Note: The topic covered in AI-501 has been relocated to AI-1851, enclosure 2.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. Similar to shift staffing above, this NOCS was implemented as a corrective action related to reactor trip. Operators inadvertently violated a Tech Spec for ESFAS. The current condition of the plant does not have any Tech Spec required equipment or the implications of a human performance failure as was present at the time of this commitment.

Note: NOCS 097923, 097933, and 097935 were made as part of the corrective action evaluation process resultant from a Plant Trip in December 1991 due to inappropriate operator actions. The associated letter for these commitments discuss the violations that were assessed from this trip. These commitments were not used to restore compliance with the regulatory obligation which were described in a separate portion of the associated letters.

Nuclear Operations Commitment System (NOCS) Number: 100222

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0682-17, dated June 15, 1982.

Original Commitment:

From 3F0682-17 page 3 (Intake Structure Gantry Crane):
The use of exclusion areas in this situation (i.e., NSSW conduits at extreme east end of bldg) is believed to meet the objectives of the NRC guidelines (i.e., guidelines in NUREG-0612). Because the essential equipment occupies only a small portion of the crane's operational area, the protection of the NSSW conduits is accomplished most effectively through the use of exclusion zones while lifts made in areas where there is no essential equipment are not unnecessarily restricted.

From 3N0784-18, NRC safety evaluation report (SER), page 8:
Exclusion areas, rather than safe load paths, have been established for the intake structure gantry crane.

From 3N0784-18 page 10:
As a part of the comprehensive load handling program developed at crystal river unit 3, the licensee stated that operating procedures have been developed to ensure that load handling follows defined load paths (i.e., for OP-421F).

Note:
The NCR's SER is approving exclusion areas in lieu of load paths for CWCR-1.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 0091, 1596, 1597, 1702, 1715, 1866, 7212, 7233, 7235, 9831, 9832, 9834, and 100222 are no longer required due to the decommissioning status of CR-3. These commitments were made to satisfy the requirements of NUREG 0612 pertaining to lifting heavy loads over nuclear fuel or safety related SSC needed to assure safe shutdown and decay heat removal. There is no longer any nuclear fuel in the plant and no SSC are necessary to support safe shutdown or decay heat removal. NO safety related SSC remain at CR3. All cranes are abandoned. Any use of cranes or special lifting devices in the reactor building in the future will be for decontamination and demolition, and procedurally controlled for personnel safety only and NUREG 0612 no longer applies in the plant. There will be no movement of heavy loads over safety related equipment or spent/new nuclear fuel. Consequently, there is no concern for an overhead handling system from which a load drop could result in damage to any system required for plant shutdown or decay heat removal. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 100296

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0601-03, dated June 14, 2001.

Original Commitment:

From 3F0601-03:
CR-3 commits to using applicable assumptions of Regulatory Guide 1.183, Rev. 0 or acceptable alternatives thereto in future revisions to the design basis public and control room dose assessments.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. This commitment pertained to the use of guidance in a Regulatory Guide to assist in performing dose assessments using the 10 CFR 50.67, Alternative Source Term. CR3 can no longer have any significant offsite releases, therefore the dose assessments are no longer required, and the guidance is no longer necessary. Consequently, this commitment is no longer relevant to CR3.

Nuclear Operations Commitment System (NOCS) Number: 100478

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0805-01, dated August 15, 2005.

Original Commitment:

Procedures will be modified to accomplish onsite protective measures by defining arrangements for accounting of personnel after the attack.

Reference EM-911 was replaced by EM-911D, Security Threats for Decommissioning Plant, as part of implementing the PDEP.
4/13/15 PAR.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

Commitments 30100 and 100478 are no longer required due to the decommissioning status of CR-3. There are no more radioactive fluid systems in the plant that could leak into non-contaminated systems. Gaseous releases from evaporation of sump water will be monitored at the exhaust on the back berm. The need to sample for cross contamination also has no significant effect on the ability of a SSC to perform its design function. Any unmonitored release would be bounded with a conservative release to compare against ODCM limits. The process of accountability after an attack has no impact on any SSC or design function. The security team on shift are usually the only ones with in the protected area. Accountability for the protected area is simple. Accountability for personnel outside of the protected area can occur but is at the discretion of the EC, and all personnel are trained in reporting to the muster point in the event of an evacuation. These commitments no longer have any relevance to CR3.

Nuclear Operations Commitment System (NOCS) Number: 100530

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0307-09, dated March 19, 2007.

Original Commitment:

CR-3 agrees with the NRC position and will ensure that procedures make it clear that whenever CR-3 fuel is in an undispersed configuration that compliance with the 2-hour deployment time for spray applies. CR-3 will meet the 5-hour deployment time whenever CR-3 fuel is in a dispersed configuration.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

These commitments (100530, 100542, 100543) pertain to requirements related to the B.5.b requirements that are now incorporated into 10 CFR 50.54 hh. They deal with the 2-hour deployment of spray, addressing the down-comer regions, and high flow makeup capability. The requirements for mitigating a design basis aircraft threat have gone away once CR3 removed all spent fuel from the spent fuel pools and placed it within the ISFSI. None of the mitigating capabilities addressed in the commitments will work for fuel in the ISFSI.

These commitments are no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. These commitments are no longer relevant to CR3.

Nuclear Operations Commitment System (NOCS) Number: 100542

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0505-06, dated May 31, 2005.

Original Commitment:

B.2.M.3

Procedures will be revised to address down-comer regions.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

These commitments (100530, 100542, 100543) pertain to requirements related to the B.5.b requirements that are now incorporated into 10 CFR 50.54 hh. They deal with the 2-hour deployment of spray, addressing the down-comer regions, and high flow makeup capability. The requirements for mitigating a design basis aircraft threat have gone away once CR3 removed all spent fuel from the spent fuel pools and placed it within the ISFSI. None of the mitigating capabilities addressed in the commitments will work for fuel in the ISFSI.

These commitments are no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. These commitments are no longer relevant to CR3.

Nuclear Operations Commitment System (NOCS) Number: 100543

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0505-06, dated May 31, 2005.

Original Commitment:

B.2.M.5

Procedures will be revised to address high flow makeup methods.

Procedures will be revised to address patches.

Note: modified to eliminate high flow makeup methods in accordance with CP-252 and REG-NGGC-0110 under NTM 507299-30.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

These commitments (100530, 100542, 100543) pertain to requirements related to the B.5.b requirements that are now incorporated into 10 CFR 50.54 hh. They deal with the 2-hour deployment of spray, addressing the down-comer regions, and high flow makeup capability. The requirements for mitigating a design basis aircraft threat have gone away once CR3 removed all spent fuel from the spent fuel pools and placed it within the ISFSI. None of the mitigating capabilities addressed in the commitments will work for fuel in the ISFSI.

These commitments are no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. These commitments are no longer relevant to CR3.

Nuclear Operations Commitment System (NOCS) Number: 100563

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F1210-05, dated December 17, 2010.

Original Commitment:

FROM 3F1210-05:

Spent fuel loading activities using the Auxiliary Building overhead crane (FHCR-5) shall not commence if an approaching or potential tropical storm, an approaching or potential hurricane, or a tornado watch or warning has been declared for the site in accordance with CR-3 site procedures. If Spent Fuel loading activities with FHCR-5 are in progress when any of the above criteria are met, the load will be lowered to a safe location. Auxiliary Building overhead crane FHCR-5 will be moved to the South end of the Auxiliary Building, away from the Spent Fuel pools, and the crane secured.

Procedures will be modified and implemented, and training conducted, as needed, prior to designating FHCR-5 as a single failure proof crane.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. License Amendment Request 310 was originally submitted to the NRC by letter dated December 20, 2010. This request was related to upgrading FHCR-5 (Auxiliary Building Overhead Crane) to single failure proof classification to allow eventual removal of Spent Fuel into a dry storage facility. License Amendment 239 (from LAR 310) was granted by letter dated December 27, 2011. The only functional purpose of this approval was the ability to move fuel into an ISFSI. Since all spent fuel has been moved to the ISFSI and the pool has been certified to no longer contain any nuclear fuel (by letter dated January 15, 2018), this commitment is no longer required, and is no longer relevant to CR3.

Nuclear Operations Commitment System (NOCS) Number: 100567

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0713-05, dated July 17, 2013 and Rescind EA-12-049 & 051.

Original Commitment:

The phase III support equipment provides ancillary inventory makeup to the pool and will be included into procedure AAG-005, contingencies for loss of SF pool level.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. AAG-5 implemented the requirements specified in EA-12-049/-051 and request for rescission of Fukushima orders (Accession No. ML12054A735, ML12054A679 and ML13144A080 respectfully). These requirements established a procedure (AAG-005) to ensure guidance and equipment capability was available to inject water for cooling the spent fuel and to ensure a robust method to monitor spent fuel pool level was available for beyond-design-basis accidents.

The spent fuel pool has been drained. The function of SF pool cooling has been eliminated through the decommissioning and abandonment process. License Amendment Request #323, discussed the removal of spent fuel from the pool and the dismantlement of the spent fuel pool. LAR #323 (3F0816-01) deleted the technical specifications requirements associated with the spent fuel pool (spent fuel pool storage, level, and boron concentration), and added under Design Features 4.3, which states Spent fuel shall not be stored in the spent fuel pool". This LAR was approved via the NRC and implemented in Amendment No. 255 (3N17-00004).

With all fuel in dry storage, the aforementioned SSCs no longer have a role in maintaining spent fuel in a safe condition; therefore, this commitment is no longer relevant to CR3.

Nuclear Operations Commitment System (NOCS) Number: 100569

Source Document:

Crystal River Unit 3 (CR-3) to NRC letter, 3F0713-05, dated July 17, 2013 and Rescind EA-12-049 & 051.

Original Commitment:

CR-3 Engineering Procedure EGR0351, condition monitoring of structures, will provide the inspection and acceptance criteria to assure design function capability is monitored under the maintenance rule.

Modify/Inactivate Commitment:

INACTIVATE:

Justification for Change:

This commitment is no longer required due to the decommissioning status of CR-3. The plant is in dry dormancy with all spent fuel in dry storage. The commitment requires inspection and acceptance criteria to assure the design function capability of the Spent Fuel Pool is monitored under the maintenance rule. The commitment also ensures that contingencies are in place to maintain adequate cooling of the spent fuel assemblies during plant events. CR3 no longer has Spent Fuel in the Spent Fuel Pool and all SSCs have been reclassified as non-safety related. Once all fuel is in dry storage maintenance rule no longer applies. 10CFR50.65 (a)(1) states the following:

“For a nuclear power plant for which the licensee has submitted the certifications specified in § 50.82(a)(1) or 52.110(a)(1) of this chapter, as applicable, this section shall only apply to the extent that the licensee shall monitor the performance or condition of all structures, systems, or components associated with the storage, control, and maintenance of spent fuel in a safe condition, in a manner sufficient to provide reasonable assurance that these structures, systems, and components are capable of fulfilling their intended functions.”

With all fuel in dry storage, the aforementioned SSCs no longer have a role in maintaining spent fuel in a safe condition; therefore, this commitment is no longer relevant to CR3.