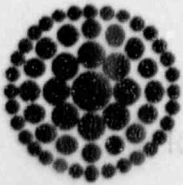


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**Florida
Power**
CORPORATION

July 18, 1995
NL95-0061

Chief, Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Comments on NRC Generic Letter 95-XX: Testing of Safety Related Circuits

Dear Sir:

Florida Power Corporation (FPC) provides the following as our comments on the subject proposed Generic Letter.

FPC's primary concern with the requested actions of the proposed Generic Letter is the schedule. Crystal River 3 (CR-3) has the potential to be very adversely affected depending on the issue date of the document. Requested Action 1 should not be linked to any refueling or maintenance outage. This review can be completed during normal plant operation. In addition, this review involves a very significant manpower commitment. In order to allow orderly planning and execution of this activity the NRC should allow at least a year following issuance of the Generic Letter. As noted in the Discussion section of the Generic letter, surveillance inadequacies have not resulted in the unavailability of safety systems when called on during an event. Thus, no immediate safety concern exists.

Allowing additional time for completion of the effort has an additional benefit to both nuclear safety and the utilities. If utility personnel are utilized for performance of the review they will learn a great deal about the systems under review. This will make them much more effective in maintaining these systems in the future and should reduce system unavailability during plant operation. Allowing additional time will also reduce costs. FPC estimates that if a short schedule requiring the services of contractors is imposed, the cost of the review will be upwards of \$1,000,000. This number will be significantly reduced if sufficient time is allowed for allocation of existing resources.

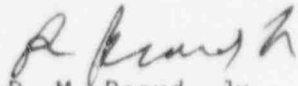
The schedule for completion of Requested Action 2 also does not need to be linked to a refueling or maintenance outage; however, the completion of any additional testing required as a result of the review will likely need to be scheduled in

conjunction with an outage. This could be handled on a case by case basis with the licensees after the specifics of the situation are known.

Additionally, FPC believes a discussion of how the NRC expects licensees to deal with operability issues when testing deficiencies are discovered should be included. Since most of the review effort will likely be conducted while the plant is in operation and since there is a potential for testing deficiencies to be applicable to multiple channels or trains, a predetermined conclusion that the effected components are inoperable would result in a plant shutdown. This would constitute a greater risk than that from the potential problems associated with untested components. Many licensees may consider the risk of plant shutdown to be sufficiently high to only perform the reviews during plant outages. A more reasonable response to these testing deficiencies should be proposed in the Generic Letter.

We appreciate the opportunity to comment on the proposed Generic Letter. We recognize that a request to verify compliance with current requirements is a legitimate request. We wish to emphasize, however, the magnitude of this request and the potential adverse impact it can have on utility resources. Adequate time for planning, scheduling, and implementing these activities is crucial to their successful completion.

Sincerely,



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

PMB:AEF

xc: Regional Administrator, Region II
Senior Resident Inspector