



**Florida  
Power**  
CORPORATION

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July 23, 1984  
WPA 84-0413

50-302

Mr. Harley Silver, Project Manager  
Operating Reactors Branch #4  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
7920 Norfolk Avenue  
Bethesda, Maryland 20014

Dear Mr. Silver:

SUBJECT: Technical Specification Change Request No. 110 (TSCRN),  
Operation of Closed Containment Isolation Valves

On April 23, 1984, Florida Power Corporation submitted TSCRN-110 concerning operation of closed containment isolation valves. Since submittal, a Technical Specification amendment and further reviews have indicated a need for clarification.

The basis for operation of the steam generator sample valves (CAV-4,5,6, and 7) was to comply with Specification 2.4.1.0. With the implementation of the Radiological Effluent Technical Specifications (RETS), this is no longer true. However, due to a need to monitor and control Secondary Side chemistry as recommended by the staff and the OTSG vendor, Florida Power Corporation still requests allowance to operate these valves.

The basis for operation of Reactor Coolant System (RCS) sample valves (CAV-1,2,3, and 126) was to monitor and maintain RCS activity within Technical Specification limits. CAV-1, however, is used to sample and vent non-condensable gases from the pressurizer. This is necessary to prevent establishing a "hard" bubble in the pressurizer, making RCS pressure control more difficult.

Florida Power Corporation intends to supplement or revise TSCRN-110 as appropriate following NRC Staff review and comment. Please do not hesitate to contact me at (904) 795-3802, extension 119, if I can be of assistance.

Sincerely,

K.R. Wilson, Supervisor  
Site Nuclear Licensing

KRW:nrk

cc: Mr. V. Panciera  
Mr. T. Stetka

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