

**FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72
REQUEST NO. 120, REVISION 0
SPECIFICATION 3.0.4 APPLICABILITY**

LICENSE DOCUMENT INVOLVED: Technical Specifications (Appendix A)
Request No. 82, Attachment C, Item III,
Reactor Coolant Vents High Points

PORTION: 3.4.11 Reactor Coolant System Vents
3.9.9 Purge and Exhaust System
3.9.11 Storage Pool

DESCRIPTION OF REQUEST:

This submittal requests exemption from Specification 3.0.4 for the Technical Specifications listed above.

REASON FOR REQUEST:

Specification 3.0.4 prohibits entry into operational modes when the Limiting Condition for Operation (LCO) is not met (including when in a degraded mode permitted by the LCO). There are certain specifications for which entry into another operational mode will not degrade plant safety and should be exempt from 3.0.4 applicability. Applying the mode restriction to these specifications may cause an unnecessary (from a safety stand point) startup or shutdown delay.

EVALUATION OF REQUEST:

Specification 3.4.11, as proposed by our letter of February 24, 1984, states that STARTUP and/or POWER OPERATION may continue provided certain actions are taken. HOT STANDBY and HOT SHUTDOWN should also be allowed to continue as there are no additional safety concerns associated with operation in these modes during vent path inoperability. Thus including these additional operational modes in exemption from Specification 3.0.4 will not degrade plant safety.

Specification 3.9.9 requires that the containment purge and exhaust system be operable in MODE 6. If this system is inoperable, entry into MODE 6 will be delayed until operability is returned. The provisions in the ACTION statement (isolate the penetration) provide adequate protection for MODE 6 operations. This exemption from Specification 3.0.4 will not degrade plant safety.

Specification 3.9.11 requires that the missile shields and 23 feet of water be maintained over the top of irradiated fuel assemblies in the storage racks. If these two requirements are not satisfied, Crystal River Unit 3 cannot startup from a shutdown until they are satisfied. The state of the storage pool has no impact on the safe operation of the reactor and, therefore, it is unnecessary to restrict reactor operation as long as the LCO is being complied with.