



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

January 31 1992

Docket No. 50-302

Mr. Percy M. Beard, Jr.
Senior Vice President,
Nuclear Operations
Florida Power Corporation
ATTN: Manager, Nuclear Operations
Licensing
P.O. Box 219-NA-21
Crystal River, Florida 32629

Dear Mr. Beard:

SUBJECT: TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) 189 RE: CHANNEL
CALIBRATION (TAC NO. M81524)

By letter dated August 22, 1991, you submitted the subject TSCR for Crystal River Unit 3 (CR-3). The request involved an addition to Technical Specification (TS) 1.9, CHANNEL CALIBRATION, to clarify the sensor calibration requirements for channels with resistance temperature detector (RTD) and thermocouple sensors.

After reviewing your submittal, the NRC staff feels that the existing TS 1.9 is sufficiently clear and allows a less rigorous sensor calibration procedure than has been conducted at CR-3 in the past. Existing TS 1.9 states, "A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated."

It is the staff's understanding that the CR-3 interpretation of TS 1.9 for channels with RTD or thermocouple sensors has involved replacement of all sensors with new, factory calibrated sensors each surveillance interval. From your amendment proposal, "[t]he proposed calibration requires replacement of a single channel['s] sensor with one calibrated to National Bureau of Standards (NBS) standards. The remaining channels' sensors are then 'cross-calibrated' to the freshly calibrated sensor."

Replacement of the single channel's sensor and calibration of the associated instrument channel satisfies the CHANNEL CALIBRATION requirement for that channel. That channel then provides the "known values" required by TS 1.9 for calibration of the remaining channels, including the associated sensors, by cross-calibration. Guidance for cross-calibration of RTDs and thermocouples can be found in NUREG/CR-5560, "Aging of Nuclear Plant Resistance Temperature

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Detectors." (Note that installed RTDs may not be cross-calibrated to independently calibrated thermocouples).

Thus, it is the staff's interpretation that your proposed calibration procedure complies with the existing TS 1.9 and that the proposed amendment is not required. This was discussed with your representative on January 24, 1992, and it was agreed that based on our conclusion that the action requested in your submittal is already permitted by the present TS, your amendment request is not necessary. Therefore, your proposed change is considered to be withdrawn. If this is not correct, please notify us of your intended actions within 10 days of your receipt of this letter.

This completes our efforts on Tac No. M81524.

Sincerely,

/s/

Harley Silver, Sr. Project Manager
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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