

## NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 31, 1995

Mr. Percy M. Beard, Jr.
Senior Vice President,
Nuclear Operations (SA2A)
Florida Power Corporation
ATTN: Manager, Nuclear
Licensing
15760 W Power Line Street
Crystal River, Florida 34428-6708

SUBJECT: CRYSTAL RIVER NUCLEAR GENERATING PLANT UNIT 3 - LOW TEMPERATURE

OVERPRESSURE (LTOP) TRANSIENT - 10 CFR 50 APPENDIX G PRESSURE

TEMPERATURE LIMITS (TAC NO. M75304)

Dear Mr. Beard:

By letter dated October 31, 1989, as supplemented August 10, 1990, you submitted information and requested technical specification (TS) changes relating to low temperature overpressure protection (LTOP) and reactor coolant system (RCS) heatup and cooldown pressure-temperature (PT) operating limits. On February 7, 1991, by Amendment No. 133, we approved RCS heatup and cooldown PT curves for operation up to 15 effective-full-power-years. Our February 7, 1991 letter did not address your proposed TS changes for LTOP, which is the subject of this letter. On August 11, 1993, your staff met with us and provided additional information in support of your request.

You proposed TS changes for LTOP using a non-10 CFR Part 50, Appendix G methodology on the basis that an LTOP-type event has a low probability of occurrence at your facility and an overpressurization event can be classified as an unanticipated operational occurrence. You believe that this approach is justified and is consistent with the recommendations in Generic Letter (GL) 88-11 "NRC position on Radiation Embrittlement of Reactor Vessel Materials and Its Impact on Plant Operations."

We have reviewed your submittals, pertinent related information from other Babcock and Wilcox plants, staff reports, and have conducted an industry survey of overpressurization events. Based on our review, we do not concur with your determination that an LTOP event is an unlikely operational occurrence during the lifetime of the plant. Therefore, your TS amendment request, which is based on a non-Appendix G PT limit and LTOP protection setpoint methodology, is denied. On August 31, 1995, we discussed with you this denial. Enclosure 1 provides our Safety Evaluation.

Accordingly, please revise your response to GL 88-11 relating to LTOP system and LTOP protection setpoint methodology. Your revised response will be reviewed under a separate technical assignment control (TAC) number. This completes our review of your proposed TS changes under TAC No. M75304 and the TAC is closed.

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This requirement affects nine or fewer respondents, and therefore, it is not subject to Office of Management and Budget review under P.L. 96-511. If you have any questions regarding this matter, please call me at (301) 415-1471.

Sincerely,

L. Raghavan, Project Manager Project Directorate II-1

Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-302

Enclosures:

1. Safety Evaluation 2. Notice of Denial

cc w/enclosures: See next page

Distribution Docket File

Public

PDII-1 Reading

S. Varga

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D. Hagan, 3302

G. Hill (2), T5-C-23

ACRS (4)

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OC/LFMB

K. Landis, R-II

R. Jones

L. Lois

J. Strosnider

\* See previous concurrence

OGC M PD: PDII-1 SRXB \* EMCB \* PM: PDII-1 Office LA: PDII-1 E. Dunnington thews JStrosni LLois L. Raghayvan Name der £10 8 1/7/95 /31 /95 8/1//95 6/27/95 7/9 /95 Date

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