

**Florida  
Power**  
CORPORATION

October 4, 1984  
3F1084-02

Director of Nuclear Reactor Regulation  
Attention: Mr. John F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
High Energy Lines Used For Blowdown Of  
The Once Through Steam Generators (OTSG)

Reference: NRC Letter from J. F. Stolz to J. A. Hancock,  
dated December 7, 1982.

Dear Sir:

In the referenced letter and its attached SER, the NRC concurred with Florida Power Corporation's (FPC's) request to use the OTSG drain lines for OTSG blowdown. These lines were to be used until Refuel V for brief periods of time above the "high energy line" threshold (200°F or 275 psig) even though they did not contain pipe whip restraints. This request was approved because the probability is very small of a double-ended pipe break occurring within the time period of: 1) start-up from cold shutdown to 15% rated thermal power, and 2) shutdown when the average reactor coolant temperature is below 300°F to cold shutdown. It was planned that resolution of this item would take place before startup after Refuel V.

Our additional operating experience with these lines has led us to the conclusion that their continued use would be beneficial. An engineering evaluation is being performed to restrain the drain lines from the OTSG's to the valves (MSV-176 and MSV-177) outside the secondary shield wall and to initiate/terminate OTSG blowdown with MSV-176/177. Because of the small amount of time the drain lines downstream of MSV-176/177 will be used above the high energy line threshold in the future, we do not believe that any additional plant modifications for the blowdown lines downstream of MSV-176/177 are justified because of high energy line considerations.

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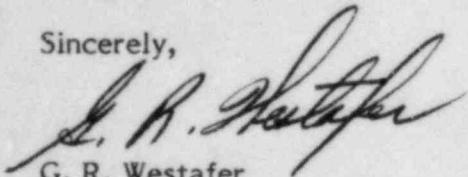
We believe the OTSG drain lines can be safely used for blowdown up to their designed capability provided that the time the drain lines downstream of MSV-176/177 operate above 200°F or 275 psig amounts to less than 2% of the time the lines are below 200°F and 275 psig. This conclusion is based on the following considerations:

1. The time the OTSG drain lines downstream of MSV-176/177 are operated above 200°F or 275 psig will be administratively controlled such that it remains less than 2% of the time the OTSG drain lines downstream of MSV-176/177 are below 200°F and 275 psig. This is consistent with the guidance contained in Branch Technical Position MEB 3-1, Rev. 1, July 1981. Plant operating procedures will be revised to limit the amount of time the OTSG drain lines downstream of MSV-176/177 operate above 200°F or 275 psig to 175.2 hours per contiguous year.
2. The maximum line size diameter is 3 inches inside containment and 4 inches outside containment. The lines contain no discontinuities because of interconnected equipment.

We, therefore, request concurrence that: 1) the drain lines downstream of MSV-176/177 need not be considered as high energy lines, if their use is controlled; and 2) FPC be allowed to use these lines in accordance with their design capability.

In accordance with 10 CFR 170, the application fee of one hundred fifty dollars (\$150) is enclosed (check #670383). Your efforts to consider this request by November 9, 1984 will enable us to proceed with equipment procurement and outage planning.

Sincerely,



G. R. Westafer  
Manager, Nuclear Operations  
Licensing and Fuel Management

DLT/feb

cc: Mr. J. P. O'Reilly  
Regional Administrator, Region II  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
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