

**Florida
Power**
CORPORATION

July 25, 1984
3F0784-15

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Technical Specification Change Request No. 103, Revision 2

Dear Mr. Denton:

Enclosed are three (3) originals and forty (40) copies of Technical Specification Change Request No. 103, Revision 2, requesting amendment to Appendix A of Operating License No. DPR-72. As part of this request, proposed replacement pages for Appendix A are enclosed.

On May 8, 1984, Florida Power Corporation received NRC comments on Change Request No. 103, Revision 1. This submittal responds to those comments and revises Change Request No. 103 accordingly.

An amendment application fee is not included with submittal as a license fee of \$1,200 was sent to the Commission on March 27, 1984 for this Change Request.

Sincerely,

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

DVH/feb

8408020010 840725
PDR ADUCK 05000302
P PDR

Enclosures

cc: Mr. J. P. O'Reilly
Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30323

*File
9/40*

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF)
) DOCKET No. 50-302
FLORIDA POWER CORPORATION)

CERTIFICATE OF SERVICE

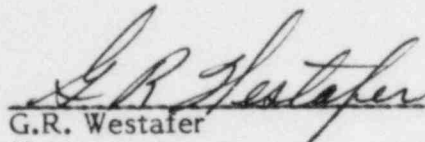
G.R. Westafer deposes and says that the following has been served on the Designated State Representative and the Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,
Board of County Commissioners
of Citrus County
Citrus County Courthouse
Inverness, FL 32650

Administrator
Radiological Health Services
Department of Health and
Rehabilitative Services
1323 Winewood Blvd.
Tallahassee, FL 32301

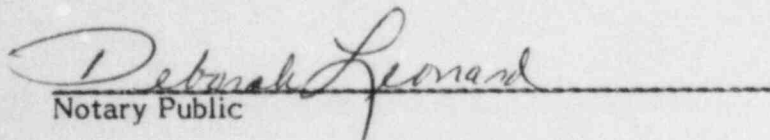
Three (3) copies of Technical Specification Change Request No. 103, requesting amendment to Appendix A of Operating Licensing No. DPR-72.

FLORIDA POWER CORPORATION



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

SWORN TO AND SUBSCRIBED BEFORE ME THIS 25th day of July, 1984.



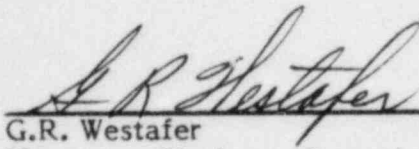
Notary Public

Notary Public, State of Florida at Large
My Commission Expires: November 19, 1986

(NOTARIAL SEAL)

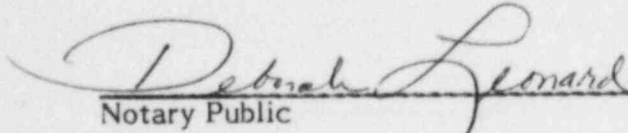
STATE OF FLORIDA
COUNTY OF PINELLAS

G.R. Westafer states that he is the Manager, Nuclear Operations Licensing and Fuel Management for Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.



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

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 25th day of July, 1984.



Notary Public

Notary Public, State of Florida at Large,
My Commission Expires: November 19, 1986

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Docket No.: 50-302

Facility: Crystal River Unit 3

Licensee: Florida Power Corporation

Date of Application: July 25, 1984

Request:

This submittal requests changes to Section 6: Administrative Controls and Table 3.7-3 to update and/or clarify these portions of the Technical Specifications.

Significant Hazards Consideration Determination:

- Amendment involves no significant hazards considerations.
- Amendment involves significant hazards considerations.

Basis for Determination:

This change is a purely administrative change to the Technical Specifications and, therefore, it does not involve a significant hazards consideration.

Requested Implementation Date:

Florida Power does not request a specific implementation date for this Change Request.

FLORIDA POWER CORPORATION'S RESPONSE TO NRC'S REQUEST FOR REVISION

Florida Power Corporation provides the following responses to your comments on Technical Specification Change Request No. 103, dated May 1, 1984.

1. Under "Training" and "Plant Review Committee"

Florida Power Corporation disagrees that the intent of the Plant Review Committee membership as proposed in the Standard Technical Specification is numerically based. The intent of this specification is to assure an interdisciplinary review is performed of significant plant events and changes. The purpose of our request for two additional "at large" members was to expand the group of qualified "Managers" which, at the discretion of the committee chairman, can be utilized to perform these reviews. This change would allow a higher level of diversity while keeping the committee quorum to a workable size.

Florida Power Corporation can accomplish this improvement without a Technical Specification amendment and does not consider quorum expansion to be necessary or beneficial overall. Thus, we have withdrawn this change from the attached Revision 2 of Change Request No. 103. Florida Power Corporation may choose to pursue this change later.

2. Under "Nuclear General Review Committee", "Review"

Florida Power Corporation agrees with the staff's recommendation to add the word "proposed" as the first word in Item C.

Florida Power Corporation disagrees however, with the recommendations to delete certain statements from Item C. The staff agreed to these statements when it helped develop and adopted ANSI N18.7. Florida Power is simply accepting the NRC's published guidance. We were, and are, unaware that the NRC's position had changed.

An example of how the statement, "Except in those cases where the change is identical to a previously reviewed proposed change", would be utilized occurred recently. Specification 3.1.2.9.b specifies a minimum volume concentration limit, and a minimum temperature for the borated water storage tank. Specification 3.5.4 also specifies these limits. If the committee has reviewed a change to 3.1.2.9, then an identical change to 3.5.4 will have no additional effect on nuclear safety.

Florida Power Corporation disagrees that changes to the Technical Specifications or license amendments "by definition" are related to nuclear safety. Typographical corrections and purely administrative changes (i.e., correcting mailing address in section 6.9.1.6) are good examples of changes which do not effect nuclear safety. Florida Power has provided additional examples on "non-nuclear safety" Technical Specifications in our comments on the proposed Technical Specification content rulemaking.

3. Under "Procedures"

Florida Power Corporation is in the process of updating the FSAR section entitled "Florida Power Corporation Quality Program Commitments" to be consistent with Technical Specification 6.8.1.a.

The Licensee staff is somewhat concerned that the NRC presumes our misinterpretation of the term "safety-related". Florida Power, in response to Generic Letter 83-28, has separated procedures into safety and non-safety related and have always done so for modifications. Certain aspects of turbine operation are "governed by the Technical Specifications", (eg. Anticipatory Reactor Trip) but we do not consider PRC review necessary for all turbine related modifications. Additionally, an in-depth review of our safety list would probably identify safety-related equipment that is not governed by the Technical Specifications. Florida Power has and will continue to review modifications that are outside of the scope of the PRC's Technical Specifications requirements consistent with the importance of equipment involved.

An existing dialogue between the NRC and the industry, and with the staff itself, is progressing regarding clarification of the phrase "safety-related". It would be premature to determine that "equipment or systems whose operation is governed by the Technical Specifications or License Conditions" is a more appropriate subject of modifications requiring review than "safety related". We are comfortable to await the clarification of "safety related" and to correct any misinterpretations at that time.

ANSI N.18.7 - 1976 as endorsed by the Reg. Guide 1.33 specifically states that the recommendations are intended to be applied to "safety-related" modifications. Thus, we appeal to your acknowledged endorsement of this guide in reviewing this change.

4. Under "Snubbers"

We have included the corrections to the classification of 31 snubbers within Revision 2 of Change Request No. 103 as recommended by the staff.

**FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72
REQUEST NO. 103, REVISION 2
SECTION 6: ADMINISTRATIVE CONTROLS**

LICENSE DOCUMENT INVOLVED Technical Specifications
Change Request No. 103, Revision 1

DESCRIPTION OF REQUEST

- 1) On new page 3/4 7-31a and page 3/4 7-34c: Add six new safety-related hydraulic snubbers to Table 3.7-3:

LRH-59	LRH-69
LRH-60	RCH-530
LRH-68	RCH-531

Revise the classification of the following snubbers to "inaccessible":

EFH-92	EFH-144	FWH-155	FWH-162	MSH-125	MSH-207	MSH-232
EFH-93	FWH-149	FWH-156	FWH-166	MSH-126	MSH-212	MSH-240
EFH-106	FWH-153	FWH-157	FWH-167	MSH-205	MSH-213	
EFH-110	FWH-154	FWH-158	FWH-169	MSH-206	MSH-227	

Revise the classification of the following snubbers to "accessible":

DHH-661
DHR-18
DHR-31
DHR-37
DHR-49

- 2) On page 6-2: Change Figure 6.2-1 to indicate the present corporate organizational structure and add the following footnote:
- "The Corporate Organization may be changed without prior License Amendment to Figure 6.2-1 provided that a revision to Figure 6.2-1 is included with the next License Amendment request."
- 3) On page 6-3: Revise Figure 6.2-2 to show the general responsibilities of each department rather than every position in each department and add a footnote similar to that added to Figure 6.2-1.
- 4) On page 6-5: In T.S. 6.4 change "Nuclear Plant Training Manager" and "Nuclear Plant Manager" to "Director, Site Nuclear Operations." In T.S. 6.5.1.2 update the PRC member's title to their current titles.
- 5) Page 6-6: In T.S. 6.5.1.6.e change "preparation and forwarding of reports" to "review of reports".
- 6) On page 6-8: Add to T.S. 6.5.2.3 "or the equivalent" after "Bachelor of Science in Engineering or related field" in both parts a. and b.

- 7) On page 6-9: In T.S. 6.5.2.8 change Nuclear General Review Committee (NGRC) review requirements to be:
- a. Safety evaluations of changes to the facility, changes in procedures and tests and experiments not described in the Final Safety Analysis Report which were completed without prior NRC approval.
 - b. Proposed changes in the facility, changes in procedures or proposed tests or experiments which may involve an unreviewed safety question.
 - c. Proposed changes in the Technical Specifications or license amendments relating to nuclear safety prior to implementation, except in those cases where the change is identical to a previously reviewed proposed change.
 - d. Violations, deviations and reportable events, which require reporting to the Nuclear Regulatory Commission in writing within 24 hours. This review should include results of investigations and recommendations resulting from such investigations.
 - e. Any other matter involving safe operation of the plant which an independent reviewer deems appropriate for consideration, or which is referred to the reviewers by members of Nuclear Operations staff or by other functional organizational units within Florida Power Corporation.
 - f. Reports and meeting minutes of the Plant Review Committee.
- 8) On page 6-10: In T.S. 6.5.2.9. under items e, f, and g replace "24 months" with "12 months".
- 9) On pages 6-12 and 6-12a: Change the organization of T.S. 6.8 so that 6.8.1 has the heading "Scope" and 6.8.2 has the heading "Review Process". Change 6.8.2 to 6.8.2.1, 6.8.2.c to 6.8.2.2, and 6.8.2.d to 6.8.2.3. Also revise T.S. 6.8.2.1.a to read:
- a. The Emergency Plan, Security Plan, Fire Protection Plan and implementing procedures, Administrative Instructions and those test procedures associated with safety related plant modifications shall be reviewed by the PRC and approved by the Nuclear Plant Manager prior to implementation.
- 10) On page 6-15: update T.S. 6.9.1.6 to specify the correct address:

Director, Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

REASON FOR REQUEST

By and large, most of the proposed changes to Section 6 of Florida Power Corporation (FPC) Technical Specification will update or clarify the current FPC position on the affected Specification. A more detailed breakdown of the reasons for the proposed changes follows.

- 1) The addition of six more hydraulic snubbers is being made in accordance with Specification 3.7.9.1 which states that snubbers may be added to safety related systems without a prior License Amendment provided that a revision to Table 3.7-3 is included with the next License Amendment request. LRH-59, 60, 68 and 69, RCH-530 and 531 were added to safety related systems during Refuel IV and should be included on Table 3.7-3.
- 2) The new Figures 6.2-1, Corporate Organization, and 6.2-2, Facility Organization, will update T.S. 6.2.1 and T.S. 6.2.2 to agree with the present organization. Moreover,
- 3) listing departmental responsibilities on Fig. 6.2-2, rather than the positions within each department, will help clarify the responsibilities of each group and interdepartmental relationships. This may also reduce the frequency of changing this organization chart.

The NRC staff has expressed a concern that the current organization is not in concurrence with the organization as described in the Technical Specifications. While the staff was not expressively concerned with the actual mechanics of the organization, it is concerned that a portion of the Technical Specifications was not being followed. To resolve this concern Florida Power has proposed a footnote that is very similar to the footnote for Table 3.7-3.

- 4) The transfer of training direction from the Nuclear Plant Manager and Nuclear Plant Training Manager to the Director, Site Nuclear Operations will update T.S. 6.4 to concur with present management structure. The changes in T.S. 6.5.1.2 reflects PRC members' title revision.
- 5) Changing PRC responsibility to review of Technical Specification violations will clarify the PRC's role in the submittal process of Technical Specification Violations.
- 6) The proposed NGRC membership qualifications in T.S. 6.5.2.3 will allow FPC to equate adequate experience to a degree. By doing this, otherwise highly qualified individuals will not be excluded from NGRC membership.
- 7) The proposed change to T.S. 6.5.2.8 will update the NGRC review requirements to concur with Standard Technical Specifications and ANSI N18.7, 1976, Administrative Controls and Quality Assurance of Nuclear Power Plants.
- 8) The proposed change to T.S. 6.5.2.9. will revise the Emergency Plan, Security Plan and Fire Protection Plan auditing frequency from 24 months to 12 months as required by 10 CFR 73.40(d).
- 9) The revision of T.S. 6.8 Procedures will help to clarify the scope and reviewing process of FPC procedures.
- 10) This updates T.S. 6.9.1.6 to specify the correct NRC address.

EVALUATION OF REQUEST

Most of the proposed changes will clarify or update current administrative positions and policies and as such will not degrade plant safety.

- 1) This proposed change is purely administrative.
- 2) The proposed change is administrative in nature and would allow Florida Power & Corporation to update Technical Specifications 6.2.1 to agree with the current
- 3) organizational structure.
- 4) This change is administrative.
- 5) This change will clarify the role of the PRC. PRC review of Technical Specification violations will continue to assure that proper evaluations and recommendations concerning these violations are performed.
- 6) Substantial expertise exists within the corporation with a large number of non-degreed individuals. To include these non-degreed individuals in the NGRC will potentially increase the effectiveness and quality of this committee.
- 7) This change is administrative in nature.
- 8) The changes of Emergency Plan, Security Plan and Fire Protection program audits to 12 months is required by 10 CFR 73.40 (d).
- 9) This change will clarify the role of the PRC. Specification 6.8.1.a has been revised to reference the 1978 edition of Regulatory Guide 1.33 as referenced in the FSAR and is also administrative in nature.

Florida Power Corporation requests that only "safety related" modification test procedures require PRC and Plant Manager review. This is consistent with the requirement of Section 6.5.1.6.d requiring PRC review of modifications to systems or equipment that affect nuclear safety.

- 10) This change is purely administrative.