

## Florida Power CORFORATION Coystal Florer Unit 3 Doctor No. 50-302

October 25, 1995 3F1095-21

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D. C. 20555

Subject: NRC 10 CFR 50.72 Reportable Event #29384.

Dear Sir:

During a review to close out a Request for Engineering Assistance (REA), a Florida Power Corporation (FPC) Engineer at Crystal River Unit 3 (CR-3) determined that two valves, when opened simultaneously, may comprise operation outside the design basis of the plant. This apparent deficiency was conservatively reported to the NRC as a 1-Hour Non-Emergency Report under 10 CFR 50.72(b)(1)(ii)(B) at 1846 on September 27, 1995, and was assigned the NRC Event # 29384.

The valves in question, MSV-130 and MSV-148 are not part of a Main Steam Line Isolation (MSLI) or Main Feedwater Isolation (MFWI) functions of the Emergency Feedwater Initiation and Control System (EFIC). They are used during startup and shutdown for Once Through Steam Generator (OTSG) blowdown. During the performance of procedure OP-608, "OTSG's and Main Steam Systems," there is a short time period (approximately 45 seconds to one minute) during which both of these valves are opened simultaneously thereby substantially cross-connecting the OTSGs. If an MSLI or MFWI automatic actuation were to occur while these valves were open, they would not receive an automatic closure signal. During the short period that both valves are open, coincident with a postulated main steam or feedwater line break event, it is not clearly defined whether this condition would be within the analyzed design basis of the plant. Based on this knowledge, the 1-Hour Non-Emergency Report was made.

Subsequently, during the preparation of the Corrective Action Plan and design basis review associated with the Problem Report documenting this condition, it was determined that two previous analyses conducted by the Nuclear Steam Supply System (NSSS) vendor (B&W) bounded the condition of MSV-130 and MSV-148 open simultaneously. This analysis provided the information necessary to determine that this condition did not place CR-3 outside its design basis.

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Therefore, based on the conclusions reached during the evaluation of this condition, FPC hereby rescinds the 1-Hour Non-Emergency Report (NRC Event # 29384). Should you have any questions concerning the engineering evaluation, please contact Mark Livingston, Acting Supervisor, Nuclear Engineering Design at (904) 795-6486, ext. 3325 or Kevin Ledzian, Senior Mechanical Engineer at (904) 795-6486, ext. 3553.

Sincerely,

B. J. Hickle, Director Nuclear Plant Operations

BJH/JAF:ff

xc: Regional Administrator, Region II

Project Manager, NRR Senior Resident Inspector