

**Florida
Power**
CORPORATION
Crystal River Unit 3
Docket No. 30-302

February 28, 1992
3F0292-13

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

Subject: Cycle 8 Core Operating Limits Report, Revision 3

- References:
1. Amendment No. 139 to the CR-3 Technical Specifications (Negative Moderator Temperature Coefficient), from H. Silver (NRC) to P. M. Beard, Jr. (FPC) dated February 12, 1992.
 2. Amendment No. 125 to the CR-3 Technical Specifications (Core Operating Limits Report), from H. Silver (NRC) to P. M. Beard, Jr. (FPC) dated January 31, 1990.
 3. NRC Generic Letter 88-16 "Removal of Cycle-Specific Parameter Limits From Technical Specifications, dated October 4, 1988.

Dear Sir:

Reference 1 amended the Crystal River Unit 3 (CR-3) Technical Specifications (TS) to relocate the negative moderator temperature coefficient limit from TS to the Core Operating Limits Report (COLR). The COLR and supplements thereto are required to be submitted to the NRC upon issuance in accordance with CR-3 TS 6.9.1.7. Therefore, Florida Power Corporation (FPC) hereby submits Revision 3 to the CR-3 Cycle 8 COLR in support of implementation of Reference 1.

FPC also wishes to take this opportunity to clarify the timing of the reporting requirement associated with the COLR. This is necessary due to conflicting guidance provided by the NRC Safety Evaluation Report (SER) written for Amendment 125 (Reference 2) and CR-3 TS 6.9.1.7 (issued as part of that Amendment).

The administrative reporting requirement of TS 6.9.1.7 was modeled after guidance published in NRC Generic Letter 88-16 (Reference 3) and states "the COLR, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, ..." (emphasis added). Reference 3 states this allowance permits the NRC to continue trending the information found in the COLR even though prior NRC

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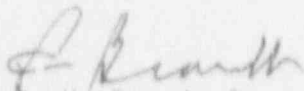
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approval of the changes is not required. There is no further insight provided within the generic letter as to the intent of the words 'upon issuance.'

The SER included with Reference 2 causes confusion as to the proper timing of the submittal of the COLR to the NRC. The SER states "[TS 6.9.1.7] requires that all changes in cycle-specific parameter limits be documented in the COLR before each reload cycle or remaining part of a reload cycle and submitted upon issuance to NRC, prior to operation with the new parameter limits" (emphasis added). A literal reading of TS 6.9.1.7 does not include the highlighted words of the previous sentence and does not specifically require submittal of the COLR revision prior to operation with the new parameters. FPC feels the intent of Reference 3 was to require a copy of the COLR be issued to the NRC on a schedule coincident with the issuance of the document to plant operating personnel (implementation). This seems more appropriate since there are generally no specific schedular requirements related to the trending of information.

To ensure there is no future confusion on this issue, FPC requests the NRC provide written clarification of the intent of the statement contained in the SER for Amendment 125. FPC will continue to provide a copy of the COLR to the NRC on a schedule coincident with CR-3 implementation until such clarification is received.

Sincerely,



P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

PMB:BPW

Attachment

xc: Regional Administrator, Region II
NRR Project Manager
Senior Resident Inspector