

Florida Power

CORPORATION

Crystal River Unit 3

Docent No. 50-302

November 9, 1995
3F1195-13

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

Subject: Sources of Emergency Feedwater for Natural Circulation Cooldown,
Generic Letter 81-21

Reference: FPC to NRC letter, 3F0491-05, dated April 24, 1991

Dear Sir:

Florida Power Corporation (FPC) is submitting this letter for two purposes, (1) to clarify the sources of emergency feedwater (EFW) that will be available to Crystal River Unit 3 (CR-3) in event of a natural circulation cooldown, and (2) to close NRC Unresolved Item 50-302/95-14-04. FPC will maintain at least 735,000 gallons of water available during Modes 1, 2 and 3 for use as emergency feedwater during a natural circulation cooldown.

The reference letter stated "A natural circulation cooldown from hot standby conditions to the decay heat cut-in conditions is expected to use 735,000 gallons of water and will take 150 hours using conservative licensing basis assumptions." The letter further stated "CR-3 has preferred EFW sources which total 1,304,000 gallons of which 990,000 gallons are controlled as Technical Specification requirements." The expected water quantity and time for cooldown have not changed since 1991, but the implementation of Improved Technical Specifications (ITS) at CR-3 in March 1994 prompts FPC to clarify the availability and quantities of the additional EFW water sources.

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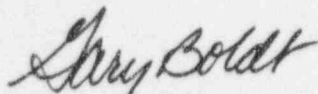
The Limiting Condition for Operation (LCO) for ITS 3.7.6, Emergency Feedwater Tank specifies 150,000 gallons must be maintained in the Emergency Feedwater Tank (EFT-2) during Modes 1, 2, and 3. If EFT-2 is not available, the backup EFW source becomes subject to the ITS conditions for the 7 day Allowed Outage Time (AOT) for EFT-2. As discussed in the ITS Bases for ITS 3.7.6, either the Condensate Storage Tank (CDT-1) or the condenser hotwell can serve as the backup source. FPC routinely surveils CDT-1 and the condenser hotwell. Historically, CDT-1 and the hotwell have been maintained each with over 150,000 gallons of water. FPC also maintains two dedicated Fire Service Water Storage Tanks. A minimum of 345,000 gallons in each tank is required by the CR-3 Fire Protection Plan. Therefore, 840,000 gallons are under ITS (EFT-2) and Fire Protection Plan (FST-1A and FST-1B) controls. These quantities are more than adequate to satisfy the cooldown amount of 735,000 gallons of water.

Surveillance Procedures SP-300 and SP-306 will be revised by February 29, 1996 to check that a total of 735,000 gallons is available for operational Modes 1, 2, and 3. If not, appropriate actions will be taken to restore the necessary volume. Additionally, since the Fire Service Storage Tanks are not hard-piped to EFT-2 like CDT-1 and the hotwell, the diesel-driven fire pumps must be connected to EFT-2 through a fire hose. FPC will develop guidance to assure that equipment to transfer the necessary water is available. These procedures will be developed by March 29, 1996. A revision to FSAR Table 10-2 will also be made to describe the changes in water sources. Those changes will be included in the next FSAR revision which is scheduled for December 1996.

The reference letter also discussed the availability of other water sources at the other fossil units in the Crystal River Energy Complex. These tanks are described in FSAR Table 10-2. Since these tanks are not under the direct control of CR-3, FPC must develop a memorandum of understanding with Fossil Operations which discusses responsibilities and actions to be taken to support CR-3 operations. FPC expects this memorandum of understanding to be completed by June 28, 1996.

This letter does not change the licensing basis for CR-3 which is HOT STANDBY as the final state for events where the reactor decay heat is assumed to be removed by EFW. RCS metal and contained water would not be cooled except by ambient losses to the containment. The quantity of EFW required to maintain hot standby for 18 hours remains at 150,000 gallons as stated in FSAR Section 10.5.3 (page 10-21). The information in this letter also does not conflict with any earlier NRC Safety Evaluation Reports related to Generic Letter 81-21.

Sincerely,



G. L. Boldt
Vice President
Nuclear Production

GLB/JWT

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