

Florida owe

August 16, 1984 3FG884-10

Director of Nuclear Reactor Regulation Attention: Mr. Darrell G. Eisenhut, Director 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 Generic Letter 84-15 Request for Extension of Response Time

Dear Sir:

Florida Power Corporation has received Generic Letter 84-15, dated July 2, 1984, requesting data and commentary related to improvement to and maintenance of diesel generator reliability.

Florida Power Corporation requests an extension of time, to November 30, 1984, to furnish the requested response. The justification for delay is as follows:

1. Crystal River 3, as a pre-1978 plant, has not committed to Regulatory Guide 1.108, and does not record diesel generator demands, failures and successes in accordance with the Reg. Guide Position C.2.e. Whereas, the current reliability of each diesel generator based strictly on surveillance test data could be determined in the requested time frame, we acknowledge that the analysis on common basis is of utmost importance, and we don't want to slight the response. The additional time is required to reformat and analyze the diesel generator demand data utilizing the recommendations of Regulatory Guide 1.108 position C.2.e for determining valid demands and failures.

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2. Our comments for staff consideration in finalizing surveillance testing requirements for diesel generators, related to Item 3 of Generic Letter 84-15 is taking the form of a comprehensive program recommendation. This is more complex than a description of our current program and comments on the example performance Technical Specifications. Development and review time is essential to provide this program in a meaningful form with appropriate content.

We request your early consideration of this request for an extension of response time.

Sincerely, . R. Auter

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

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