

**Florida
Power**
CORPORATION
Crystal River Unit 3
Docket No. 50-302

April 22, 1992
3F0492-02

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

Subject: Pump and Valve Program, Revision 13

References: A. FPC to NRC, 3F1089-01, dated October 3, 1989
B. FPC to NRC, 3F0590-01, dated May 24, 1990
C. FPC to NRC, 3F0491-01, dated April 4, 1991
D. FPC to NRC, 3F1091-01, dated October 31, 1991
E. NRC to FPC, 3N0392-19, dated March 23, 1992

Dear Sir:

Attached please find Revision 13 to Crystal River Unit 3's Pump and Valve Program submitted in accordance with 10 CFR 50.55a(g) and the guidelines of Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs". Provided in the attachment is a brief description of technical and editorial changes made in this revision. Since the plan has been completely reformatted only selected editorial changes are described. The technical changes are due to modifications; follow-up actions to commitments made in References A, B, C or D; revisions to previously approved Requests for Relief and additional Cold Shutdown Justifications.

Reference E, "Inservice Testing (IST) Program Relief Request Safety Evaluation" has been recently received by Florida Power Corporation (FPC). This Safety Evaluation (SE) provides the results of the NRC staff's evaluation of the Crystal River Unit 3 Pump and Valve Program. FPC will respond to the SE in a separate submittal. However, Revision 13 to the Pump and Valve Program already includes changes which address several of the anomalies listed in Section 3.0 of the SE. These changes are:

1. Relief Request V-080 has been revised to reflect that closure verification of CHV-91 is no longer needed because the valve does not perform a safety function in the closed position.
2. Relief Request V-113 has been revised to state the absolute limits in the "Alert" and "Action" ranges as specified in OMA-1988, Part 6.

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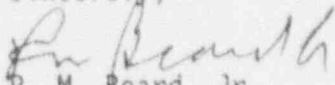
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3. Reference B described FPC's intent of providing closure verification of check valves BSV-1 and BSV-8 by disassembly and inspection. Further review of their function revealed that these valves did not have a safety function in the closed position. Therefore, Revision 13 reflects this change.
4. Revision 13 shows that closure verification of Decay Heat valves DHV-33 and DHV-36 will be performed using the method of disassembly and inspection starting in Refuel 8.

Sincerely,



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

PMB/LVC

Attachment

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

CHANGES TO THE CRYSTAL RIVER UNIT 3
PUMP & VALVE PROGRAM

<u>Table 1 - Pump Testing</u>	Added Remark on each page, change barred
<u>Table 1 - Valve Testing</u>	
Reactor Building	
Pressure Sensing & Testing	Deleted blank page
Chemical Additive & Sampling	Deleted blank page
OTSG Chemical Cleaning	Deleted blank page
BSV-1, BSV-8	Added Remark, change barred
CFV-25, CFV-26	Relocated from Table 2 to Table 1, change barred
CHV-91	Relocated from Table 2 to Table 1, change barred
CHV-91, 202	Added surveillance procedure reference/REA 91-0978
CHV-113	Remarks, word "testing" changed to "tested"
Diesel Generator Coolant	Deleted blank page
DC	Changed "Sheet 1 of 7" to "Sheet 1 of 3"
DCV-23, 24	Changed Test Method from "EF-1P" to "EF-1F", added a remark regarding MAR 91-05-35-01
DHV-33, 36	Moved to Table 2 to reflect Disassembly/Inspection per FPC to NRC letter 3F1091-01, change barred
EFV-5	Remark "EFV-5, 6, 7, & 8 full-stroke exercise..." added and change barred
EFV-15	Remark "EFV-15, 16, 17, & 18 are..." added and change barred
NGV-249	Remove from Emergency Feedwater and relocated to Nitrogen system
FWV-43, 44	Deleted comment/closure verification per SP-349B quarterly. Change barred
FWV-14	Remark changed to "...Class 3 and incorporated into this Program"
MSV-411, 412, 413, 414	"MSRM" removed from remarks and change barred

CHANGES TO THE CRYSTAL RIVER UNIT 3
PUMP & VALVE PROGRAM (continued)

MUV-505	Norm. Pos. changed to "O" and change barred
MUV-65	Modified from indication of partial stroke to full-stroke test every 3 months, change barred
MUV-23 & MUV-24	Added "ESA Signal: HPI"
MUV-258 - MUV-260	Added "ESA Signal: AB Isolation"
SWV-47, 48, 49, 50, 109, 110	Relocated to Table 1, change barred
Gas Waste Disposal System	Deleted blank page
 <u>Table 2 - Valve Testing</u>	
Auxiliary Steam	Deleted blank page
Fire Service	Deleted blank page
Feedwater	Deleted blank page
RCV-164	Remarks column moved to RCV-157
RCV-8 and 9	Relocated to Table 2, change barred
Spent Fuel Cooling	Deleted blank page
Nuclear Services Closed Cycle Cooling	Deleted blank page
MSV-186, 187, 55, 56	Modified testing method indications, and added Cold Shutdown Justification CS-213 and CS-214, change barred
BSV-26, 27, 150, 151	Changed "Tear down" to "Disassemble"
CHV-66	Changed test frequency from 3 to 5, change barred
CHV-95	Deleted "1 EF-1F"
MUV-137, 178	Added V-115; "As Found" test required prior to performing any maintenance, change barred

CHANGES TO THE CRYSTAL RIVER UNIT 3
PUMP & VALVE PROGRAM (continued)

WDV-387 - WDV-389 Test frequency changed from 2 to 5, change barred

A generic change involved all Safety/Relief valves and their testing frequencies. MSSV & RCSV's were changed from "3" to "4", balance changed from "3" to "5". This was done as a result of changing this code under 3.9 of Valve Testing (Tab 3.0). The old code "4" no longer is applicable, and code "5" has been added.

Table 3 - Valve Testing

CDV-257	Removed from "EFV" and relocated to "CD"
EGV-64 & 65	Added, change barred
SFV-5, 83, 187	Added, change barred, DCN 90-313
DHV-95, 126	MAR 90-11-09-01, change barred
MUV-273, 520	MAR 90-11-09-01, change barred
CAV-619, 620, 621, 622	MAR 87-03-16-01, change barred
MSV-542	MAR 90-01-02-01, change barred
SWV-763, 765-768	MAR 86-12-02-01, change barred
SWV-770 - 776	MAR 91-01-06-01, change barred

Relief Requests

V-030	Corrected typo in paragraph I a "spay" nozzles to "spray"
V-080	Modified to delete reference to CHV-91. CHV-95 is now a check valve in its own group. The implementation schedule for disassembly and inspection of CHV-95 has been changed to Refuel 3. Change barred
V-113	Changed "but not" to "or", as is indicated in OMa-1988, Part 6
V-160	Corrected typo in III, "greather" to "greater"
V-191	Corrected typo error -- changed "LTDP" to "LTOP"

CHANGES TO THE CRYSTAL RIVER UNIT 3
PUMP & VALVE PROGRAM (continued)

V-200 Added reference to relief from closure verification, and changed alternative for open verification to be full flow tested in a Refuel Outage frequency. Change barred

DF-91-01 Added to the Program due to NRC approval. Change barred.

Cold Shutdown Justifications

CS-213 Added, change barred

CS-214 Added, change barred