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

1/2/96

3F1295-18

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46, Generic Letter 87-02

References: 1. FPC to NRC letter, 3F0893-12, dated August 27, 1993
2. FPC to NRC letter, 3F0493-09, dated April 16, 1993
3. FPC to NRC letter, 3F0894-02, dated August 15, 1994

Dear Sir:

Florida Power Corporation (FPC) submitted Reference 1 in response to Generic Letter 87-02, Supplement 1. In that submittal, FPC provided the Plant Specific Procedure (PSP) for Seismic Verification of Nuclear Plant Equipment for resolution of USI A-46 for Crystal River 3 (CR-3). FPC committed to submit the final report in accordance with that procedure by December 31, 1995. Over 90% of the components on the Safe Shutdown Equipment List produced in accordance with the PSP have been walked down. The report describing the results of the program is attached. Approximately 130 components (out of 727) remain open. These include 95 components whose seismic capability is still in question (outliers), as well as 35 components which have not been accessible since the start of the walkdown program. Access to all of the inaccessible components should be possible during the upcoming refueling outage scheduled to begin on February 29, 1996. Resolution of the outliers will be prioritized in accordance with FPC's master scheduling program. Our goal is that all outliers should be resolved by the end of Refuel 12 in the Spring of 2000. At that time, the NRC will be notified in accordance with Section 9.5 of the PSP. The outlier resolution presented in Table 5-4 of the attached report is based upon the best information available at this time. As more information becomes available, the resolution may change.

In Reference 2, FPC indicated that the seismic portion of the Individual Plant Evaluation for External Events (IPEEE) would be resolved through the A-46 effort, with no increase in scope. Reference 2 also stated:

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> *"FPC recognizes there are additional tasks suggested for the scope of IPEEE seismic, beyond the GIP or the CR-3 plant specific procedure. This scope difference is minimal for a reduced scope IPEEE plant such as CR-3. FPC believes that the additional tasks would not produce any meaningful results. The additional structures, systems and components are either inherently seismically rugged for a 0.1g SSE plant, or any possible vulnerability will be generic enough to be detected through the CR-3 plant specific procedure. This assumption will be reexamined following completion of the plant specific walkdown procedure to assure it remains valid."*

This examination has been completed. Based on the results of the walkdown using the PSP, FPC concludes that there is little or no safety benefit to be gained by expanding the scope of the program to include the additional structures, systems, and components that are within the scope of IPEEE seismic but not A-46.

In Attachment 1 to Reference 3, FPC reported on the results of a study to identify "bad actor relays" as defined in EPRI Report NP-7148-SL, Appendix E. The study concluded that there were 17 such relays associated with safe shutdown equipment, but that 15 of them were only used to generate alarms which would subsequently clear. Momentary chatter of these relays during a seismic event is not considered to be a problem. The remaining two relays are loss of field relays associated with the emergency diesel generators. FPC committed to replace these two relays. A more detailed investigation of the function of these two relays has revealed that they only perform an alarm function and do not impact the operation of the diesel. In light of this new information, FPC no longer considers replacement of the relays necessary.

Sincerely,

Gary Boldt for

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

Attachment

PMB:AEF

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