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Robert C. Jones, gs 57 FR 6748 2/2:1/92

## Florida Power

Crystal River Unit 3 Docket No. 50-302

> April 30, 1992 3F0492-15

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

Subject: Comments on Draft NUREG-1449 - Shutdown and Low-Power Operation at Commercial Nuclear Power Plants in the United States

Dear Sir:

Florida Power Corporation concurs with the comments offered by NUMARC on Sections 7 and 8 of draft NUREG-1449, Shutdown and Low-Power Operation at Commercial Nuclear Power Plants in the United States. We urge the NRC Staff to consider these comments carefully when determining additional regulatory requirements to be imposed on the industry.

In addition, we wish to point out that Crystal River 3 (CR-3) is the lead plant in the Technical Specification Improvement Program. The improved specifications for CR-3 are currently planned to be implemented in Spring 1993. It is our plan to include appropriate enhancements to reduce shutdown risk in the initial issue of the improved Technical Specifications even though the current draft of the improved standard does not include this at this time.

Sincerely,

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

PMB/AEF: ff

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

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