



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

May 11, 1992

Docket No. 50-302

F. J. Beard, Jr.  
Plant,  
Florida Power Corporation  
ATtn: Manager, Nuclear Operations  
Licen  
P.O. Box 1000  
Crystal River, Florida 32629

Dear Mr. Beard:

SUBJECT: CRYSTAL RIVER UNIT 3 - REFUEL 8 SCOPE (TAC NO. M83163)

We have reviewed your letter of March 24, 1992 on the above subject and have taken note of the considerable work expected to be completed during the upcoming refueling outage (8R), including efforts in response to NRC initiatives as well as those needed to resolve problems which have arisen in the past.

The following addresses those tasks which you had previously committed to complete during 8R, but now find that you are unable to do by the presently scheduled end of that outage.

Reactor Building Equipment Relocation

Letdown Cooler Isolation Valves: Your letter indicates that only equipment involved in position indication of these valves will be submerged if the valves are not raised. Submergence (of only a few inches) would not occur for at least 25 minutes, well after the valves had operated. You further note that raising the valves would be difficult and time consuming, and would result in significant occupational exposure.

In order for us to agree with your conclusion that the retention of position indication for these valves in this postulated worst case flooding situation does not justify the cost and expense involved in raising the valves, you should provide a basis for reasonable assurance that the valves will remain in their correct position and that any subsequent failure will not be detrimental to plant safety. Any necessary procedure changes and operator training should also be accomplished.

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May 11, 1992

Mr. Percy M. Beard, Jr.

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Other Reactor Building Equipment Relocation: With regard to the remainder of the equipment to be relocated, delaying this portion of the work, as identified in your letter, to the next mid-cycle outage (9M) because of resource management and interference problems in 8R, is acceptable, providing that the commitments and requirements described in our letter of June 21, 1990 regarding the interim resolution of the flooding problem remain in effect until all modifications involved with the permanent solution are complete. These include: limiting the drawdown of the borated water storage tank; modification of the switchover point based on an appropriate reactor building water level; assurance of at least 10 minutes for operator action; addition of an alarm as a backup to the procedurally-required operator action; and conforming with TS LCOs and surveillance requirements.

Your letter indicates that the work on DHV-3 is being deferred to 9R (spring of 1994). Discussions with members of your staff indicate that the DHV-3 effort presently encompasses equipment qualification (EQ) and valve performance considerations in addition to flood level relocation, and that your planning assumed that all work on the valve would be performed at the same time. Since work on the valve internals requires reactor coolant system draindown and interferences prevent doing this work in 8R, 9R then becomes the next opportunity. However, it was indicated that consideration is being given to performing the flood level work in 9M, and the EQ modifications (motor replacement) in 8R. We encourage accelerating these schedules, and request that your response to this letter address this issue.

EQ List Modifications: Your letter is not clear as to whether only the lube oil pump motors will not be modified in 8R, or whether other components as well are expected to be deferred. In any event, if any items now on the EQ Master List will not be qualified by the end of the 8R, the guidance provided in Generic Letter 88-07 should be followed.

Our approval of your present plans to complete the RB flood level and EQ modifications on the schedule in your letter of March 24, 1992 is contingent on provision of the information requested above, and confirmation that you will adhere to the requirements and commitments outlined. Please provide this information and confirmation within 30 days of the date of this letter.

This requirement affects fewer than 10 respondents and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,

Harley Silver, Sr. Project Manager  
Project Directorate II-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

cc: See next page

\* See Previous Concurrence

LA: PDI-2

PM: PDI-2

D: PDI-2

RII

SPLB

D: Silver

HS: Silver

HBerkow

\*CJulian

\*CMcCracken

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5/7/92

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