

**Florida  
Power**  
CORPORATION

March 12, 1985  
3F0385-10

Director of Nuclear Reactor Regulation  
Attention: Mr. John F. Stolz, Chief  
Operating Reactors Branch #4  
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  
High Energy Lines Used for Blowdown of the  
Once Through Steam Generators (OTSG)

Reference: 1) NRC Letter from J. F. Stolz to J. A. Hancock,  
dated December 7, 1982  
2) FPC Letter from G. R. Westafer to J. F. Stolz,  
dated October 4, 1984

Dear Sir:

In Reference 1 and its attached SER, the NRC concurred with FPC's request to use the OTSG drain lines for OTSG blowdown. These lines were to be used until Refuel V for brief periods of time (i.e., below 15% rated thermal power for startup and below 300°F average reactor coolant temperature for shutdowns) above the "high energy line" threshold (200°F or 275 psig) even though they did not contain pipe whip restraints. It was planned that resolution of this item would take place before startup after Refuel V.

The engineering study and early design phases of this project indicated that ten to fifteen pipe whip restraints would be needed on the OTSG drain lines, at an initial cost of approximately \$28,000 per restraint. Therefore, FPC requested in Reference 2: 1) the drain lines downstream of valves MSV-176 and MSV-177 be exempted from consideration as high energy lines, if their use above 200°F or 275 psig was limited to less than 2% of the time they are below 200°F and 275 psig; and 2) allowance to use the drain lines up to their design capability rather than still be limited to below 15% rated thermal power for startups and below 300°F average reactor coolant temperature for shutdowns.

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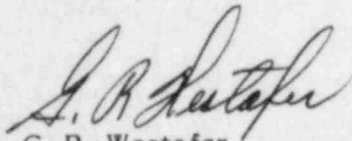
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However, the recently completed final design indicates a maximum of four pipe whip restraints are required, at an installed cost of approximately \$15,000 per restraint. Of these four restraints, one would not have been exempted in any case and another may be eliminated pending evaluation during Refuel V of an inaccessible "break" location. Hence, the potential cost savings associated with the exemption has decreased from as much as \$420,000 to less than \$50,000. The 2% limit on blowdown time and any additional engineering expenditures required to pursue our request would further reduce any potential savings associated with our October 4, 1984 request.

We, therefore, withdraw our October 4, 1984 request to exempt the drain lines downstream of valves MSV-176/177 from high energy line consideration based on their limited use. FPC will instead install during Refuel V the necessary pipe whip restraints required to comply with the December 7, 1982 SER.

Sincerely,



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

DLT/feb

cc: Dr. J. Nelson Grace  
Regional Administrator, Region II  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
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