



January 31, 1985 3F0185-23

Director of Nuclear Reactor Regulation Attention: Mr. John E. Stolz, Chief Operating Reactors Branch #4 Division of Licensing U.S. Nuclear Regulatory Commission Washington, DC 20555

- Subject: Crystal River Unit 3 Docket No. 50-302 Operating License No. DPR-72 Technical Specification Change Request No. 82, Supplement 4 Additional Information
- Reference: FPC Letter to NRC Dated December 14, 1984 Regarding Technical Specification Change Request No. 82, Supplement 4

Dear Sir:

By the referenced letter, Florida Power Corporation (FPC) requested a change to specific Technical Specifications to allow an extension of seven 18-month surveillance requirements required to be performed during shutdown. During the review of our request, the NRC staff requested additional information to justify our confidence in the continued reliable operation of the affected instrument strings during the remainder of the fuel cycle (less than one month over the allowed interval).

Since all work is performed by Work Request at Crystal River Unit 3, FPC conducted a review of the Work Requests for these instrument strings. The results of our review showed only one Work Request during the current cycle (i.e., since the last refueling outage). The Work Request was to place the paper in a chart recorder back onto the sprockets. Since no Work Requests have been issued to correct instrument setpoint drift, etc., it is concluded that no significant drift

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has been identified in past surveillance tests or by normal operator observation. Based on these facts, FPC concludes the affected instrument strings have been historically stable and reliable and can reasonably be expected to continue to do so for the short period of time requested.

Sincerely,

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

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cc: Mr. J. P. O'Reilly Regional Administrator, Region II Office of Inspection and Enforcement U.S. Nuclear Regulatory Commission 101 Marietta Street N.W., Suite 2900 Atlanta, GA 30323