

Florida Power

CORPORATION
Crystal River Unit 3
Socket No. 50-302

September 4, 1992

3F0992-02

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

Subject: Generic Letter 87-02, Supplement 1
Verification of Seismic Adequacy of Equipment in Older Operating
Nuclear Plants

References: A. Generic Letter 87-02, dated February 19, 1987 (3N0287-39)
B. Generic Letter 87-02, Supplement 1, dated May 22, 1992
(3N0592-20)
C. FPC letter to NRC, December 19, 1991 (3F1291-01)
D. Generic Letter 88-20, Supplement 4, dated June 28, 1991
(3N0691-23)

Dear Sir:

Reference A encouraged utilities to participate in a generic program to accomplish seismic verification. As a result, the Seismic Qualification Utility Group (SQUG) developed the Generic Implementation Procedure (GIP) for Seismic Verification of nuclear plant equipment. In Reference B, the NRC Staff issued a final Supplemental Safety Evaluation Report (SSER) on Revision 2 of the GIP. The letter requests that Florida Power Corporation (FPC) provide to the NRC, within 120 days, a description of FPC's plans for resolution of USI A-46 for Crystal River 3 (CR-3). This letter responds to that request. This letter also supplements FPC's response (Reference C) to Generic Letter 88-20, Supplement 4 (Reference D) for that portion related to seismic issues.

SEISMIC PROGRAM COMMITMENT

As part of its program for resolution of USI A-46, FPC is planning to establish a formal seismic design basis program applicable to all safety related equipment. A Seismic Steering Committee was formed in March of this year to define the overall scope of the program and direct the effort. The following elements will be included in the development of this program.

- o FPC will review the licensing basis earthquake magnitude to determine if safety can be enhanced by changing to a more appropriate Safe Shutdown Earthquake. Consideration will be given to both the safety benefits of

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enhanced seismic ruggedness and the potential operational and safety benefits of less rigid system supports.

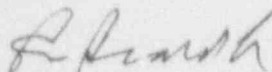
- o FPC will evaluate the benefits of updating from a 2 dimensional to 3 dimensional earthquake. This would be more consistent with current engineering and licensing practice.
- o FPC will review the current licensing basis damping coefficients to determine if it would be more appropriate to use higher or lower values for some components or structures.
- o FPC will review the current design basis floor spectra to determine if they contain a minimal, sufficient, or an excessive degree of conservatism.
- o FPC will also review the current "falldown" criteria for non-safety related piping, conduit, cable trays, ductwork, lighting and equipment. The current guidance was put in place in 1984 and has created inconsistencies in the plant with items installed before that. These inconsistencies will be evaluated and eliminated through clarified guidance or plant modifications.
- o The program development will consider alternative means of demonstrating seismic qualification and a refined definition of how seismic qualification relates to Technical Specification OPERABILITY.

The result of this effort will be a formalized seismic licensing basis and design guide for Crystal River 3. This program will also include the development of a plant specific procedure, based on the GIP, for verification of the seismic adequacy of the safe shutdown equipment installed at CR-3. This procedure will be used in a plant walk-down to resolve USI A-46 for Crystal River 3.

SCHEDULE

Work will begin on the program during the 4th quarter of 1992. A formal response to the NRC on seismic issues will be submitted by June 30, 1993. This submittal will include detailed information on floor spectra and the plant specific walkdown procedure, based on the GIP, to be used for resolution of USI A-46 and the seismic portion of the IPEEE. The walkdown is currently scheduled to be conducted in 1995 and the report will be submitted to the NRC by December 31, 1995.

Sincerely,



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

PMB/AEF:

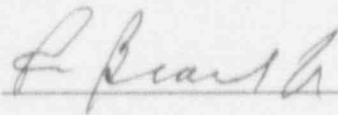
xc: Regional Administrator, Region II
Senior Resident Inspector

NRR Project Manager

STATE OF FLORIDA

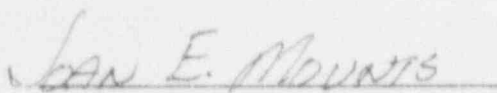
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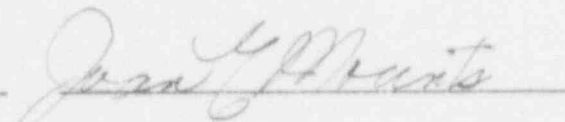
P. M. Beard, Jr. states that he is the Senior Vice President, Nuclear Operations for Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.



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

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 4th day of September, 1992.





Notary Public

Notary Public, State of Florida at Large,

Notary Public, State of Florida

My Commission Expires: My Commission Expires Oct. 17, 1994

Bonded thru Troy Fair - Insurance Inc.