Florida
Power
CORPORATION
Crystal River Unit 3
Docket No. 50-302

January 20, 1993
3F0193-06

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

Subject: Pressurizer Safety and Relief Valves
NUREG-0737, Item II.D.1

References:
1. NRC to FPC letter, 3N0389-23, dated March 22, 1989
2. NRC to FPC letter, 3N0885-23, dated August 26, 1985
3. FPC to NRC letter, 3F0286-09, dated February 17, 1986
4. FPC to NRC letter, 3F1290-07, dated December 20, 1990

Dear Sir:

Florida Power Corporation (FPC) is submitting this letter as our response to the issues identified in Reference 1 as not satisfying the requirements of NUREG-0737, Item II.D.1. Although Reference 1 states that the NRC does not intend further review of this issue, FPC is advising the NRC we are taking exception to one of the Safety Evaluation Report (SER) findings discussed in Reference 1. SER Section 5.2, Item 5 states that the power operated relief valve (PORV) control circuitry for Crystal River Unit 3 (CR-3) must be qualified to harsh environment conditions. FPC still concludes this qualification is unnecessary and not in accord with the original NUREG-0737 requirements. FPC has evaluated the other three SER open items related to piping and support analyses for the safety valves and PORV. These evaluations conclude that the piping and supports will meet the requirements of NUREG-0737 with completion of a minor modification to Support RCH-5A, which is an existing spring can that must be modified to a rigid strut. The modification to Support RCH-5A will be made during the 9M Outage scheduled to begin in March 1993. The remainder of this letter discusses our position on the PORV control circuitry qualification.

250120

A003 1/0

FPC POSITION

FPC is taking exception to the NRC finding that the PORV control circuitry must be qualified. The basis for our position follows.

1. The NRC position that qualification is a NUREG-0737 requirement was advocated for the first time by the NRC in Reference 2, almost five years after the publication of the NUREG. This lapse of time appears to indicate tacit approval by the NRC of the original NUREG-0737 requirements. FPC noted in Reference 3 Reply Number 8 that we did not concur with this new NRC interpretation of the NUREG-0737, Item II.D.1 requirements. NUREG-0737, Item II.D.1.A describes in detail the requirements for qualification of the block valve. In fact, the NUREG requirement acknowledges that qualification of the block valves is a new requirement, but no mention is made of qualifying the PORV or any control circuitry. The subsequent "clarification" paragraph under Item II.D.1 amplifies the NRC's reasoning for requiring the qualification of the block valves. If qualification of the PORV and control circuitry were intended by the NUREG-0737 requirements as maintained by the NRC staff in References 1 and 2, then specific statements in NUREG-0737 to that fact would have appeared.

2. The NRC maintains in Reference 1 that "FPC's submittal (Reference 3) clearly states the limiting inlet conditions for the PORV include extended HPI operation following an FSAR steam line break." What Reference 3 Reply Number 2 says is that the PORV will open during extended HPI operation. It opens because as a pressure relief device it operates due to increasing pressure. The analyses for extended HPI operation during a steam line break or any design bases accident for CR-3 do not take credit for the PORV operation. If the PORV were to fail open, the fully qualified block valve would be used to isolate the PORV. Failure of the PORV to operate does not contribute to any increase in accident consequences. The pressurizer safety valves provide the pressure relief necessary to mitigate an overpressure event.

3. Reference 4 is FPC's response to Generic Letter 90-06. In our response, we detailed our reasons for not including additional PORV shutdown requirements in CR-3 Technical Specifications. Our position is based upon the fact that the PORV is not used to mitigate any design basis accident. Consequently, no qualification of PORV control circuitry is required.

Sincerely,

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

PMB/JWT:ff

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