

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

June 6, 1997
3F0697-23

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: **LTOPS PROPOSED TECHNICAL SPECIFICATION CHANGE REQUEST**

Reference: A. FPC to NRC letter, 3F0497-05, "Revised Low Temperature Overpressurization Protection Features and Request for Exemption to Use ASME Code Case N-514", dated April 7, 1997.

Dear Sir:

The purpose of this letter is to confirm that FPC has implemented the administrative controls and revised the PORV setpoint as stated in Reference A. In addition, this letter revises FPC's commitment to submit a Technical Specification change request for LTOP features at Crystal River 3 (CR-3).

Florida Power Corporation (FPC) submitted proposed actions with a Justification for Continued Operation (JCO) in Enclosure 1 of Reference A to continue implementing LTOP features through administrative controls at Crystal River 3 until a Technical Specification change request for LTOP features is submitted and approved by the NRC. The features implemented include a RCS maximum pressure limit restriction of 100 psig and a lower PORV setpoint of 454 psig based on the NRC approved 15 EFY pressure-temperature (P/T) curves for Crystal River 3. These administrative controls have been completed and will remain in effect until a revised Technical Specification with approved LTOP features that address the full range of RCS pressures is submitted, issued by NRC, and implemented at CR-3.

Reference A stated that the Technical Specification change request for LTOP features would be submitted by September 18, 1997. This date was based on CR-3 pursuing an LTOP technical specification change based on revised P/T curves for 32 EFY. This schedule would not support heatup and ascension to Mode 4 by December 1, 1997.

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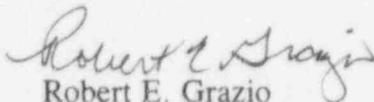


Therefore, FPC will submit the Technical Specification change request for LTOP features based on 15 EFPY P/T curves and use of ASME Code Case N-514 by July 16, 1997 to support CR-3's planned restart from the current outage in early December 1997. FPC will request NRC approval of this Technical Specification change request by September 16, 1997, upon submitting this change request by July 16, 1997. After CR-3 restart and return to power operation, FPC will submit a subsequent LTOP Technical Specification change request for Crystal River 3 based on 32 EFPY P/T curves. This submittal will be completed at least 12 months before the end of the 15 EFPY period.

In Enclosure 2 of Reference A, FPC also requested NRC approval of an exemption to use ASME Code Case N-514 by July 15, 1997. NRC approval of Code Case N-514 is necessary to support development of the Technical Specification change request for LTOP features to be submitted July 16, 1997. As NRC has not yet approved FPC's requested exemption, FPC will prepare the Technical Specification change request in a form that will implement the use of Code Case N-514 once NRC approves the subject exemption.

Please contact D.F. Kunsemiller, Manager of Nuclear Licensing at (352) 563-4566 if you have any questions regarding this schedule change.

Sincerely,



Robert E. Grazio
Director, Nuclear Regulatory Affairs

Attachment

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

LTOPS Proposed TSCR COMMITMENTS 3F0697-23

COMMITMENT	LETTER REF.	DATE DUE
FPC will submit the Technical Specification change request for LTOP features based on 15 EFPY Pressure-Temperature curves and use of ASME Code Case N-514	Page 2	July 16, 1997
FPC will submit a subsequent LTOP Technical Specification change request for Crystal River 3 based on 32 EFPY Pressure-Temperature (P/T) curves	Page 2	12 months before the end of the 15 EFPY period