

## Florida Power

CORPORATION  
Crystal River Unit 3  
Docket No. 89-302

July 21, 1997  
3F0797-25

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

Subject: Technical Specification Change Request No. 202 and Amendment  
No. 152, 18 to 24-Month Fuel Cycle Surveillance Extensions

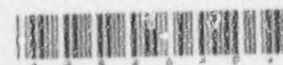
References 1. FPC to NRC letter, 3F0595-01, dated May 31, 1995  
2. FPC to NRC letter, 3F1195-25, dated November 28, 1995  
3. FPC to NRC letter, 3F1295-20, dated December 21, 1995  
4. NRC to FPC letter, 3N0296-04, dated February 13, 1996

Dear Sir:

On May 31, 1995, Florida Power Corporation (FPC) submitted Technical Specification Change Request No. 202 for 24 month fuel cycle surveillance extensions; Reference 1. Subsequently, FPC submitted additional information in support for this request; References 2 and 3. The U.S. Nuclear Regulatory Commission (NRC) issued Amendment No. 152 to the Crystal River 3 (CR-3) Operating License; Reference 4.

The purpose of this letter is to: 1) provide additional clarification and information on the NRC's Safety Evaluation Report (SER) that accompanied Amendment No. 152, and 2) withdraw requested Technical Specification changes made in Reference 1 that were not related to 24 month fuel cycle surveillance extensions and were not issued with Amendment No. 152. These requested changes will be evaluated and, if appropriate, submitted as a future Technical Specification Change.

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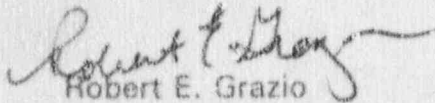


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Details for the above SER clarifications and withdrawal of the Technical Specification Requests are provided in Attachments 2 and 3.

Attachment 1 is a listing of commitments made in this letter. If you have any questions regarding this letter, please contact D. F. Kunsemiller, Manager, Nuclear Licensing at (352) 563-4566.

Sincerely,



Robert E. Grazio  
Director, Nuclear Regulatory Affairs

REG/jnb  
Attachments

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

Attachment 1

List of Regulatory Commitments

The following table identifies those actions committed to by Florida Power Corporation in this document. Any other actions discussed in the submittal represents intended or planned actions by Florida Power Corporation. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager, Nuclear Licensing of any questions regarding this document or any associated regulatory commitments.

ID NUMBER	COMMITMENT	COMMITMENT DATE
3F0797-25-1	Evaluation of drift data and the impact of the increased surveillance intervals will be completed within 180 days after restart from a refueling outage and any potential revisions to calibration intervals or setpoints will be made during this period.	Re-occurring commitment, 180 days following restart from a refueling outage.

## Attachment 2

### Clarification of SER Information in CR-3 Amendment 152

A post-issuance review of the SER identified three areas where NRC's description of the instrumentation monitoring programs differed slightly from FPC's program and from information provided in Reference 1. On January 16, 1997, FPC and NRC technical personnel discussed these differences and it was agreed that the following clarifications and additional information should be provided:

1) SER Section 2.0, "Evaluation", Page 3:

*"Additionally, the safety system instrumentation setpoints include manufacturer-provided 30-month instrument drift values, and if the drift term was not bounded by the existing allowance, the surveillance interval remained at 18-months per the existing Technical Specifications."*

1) Clarification:

The 30 month instrument drift values that were provided by the manufacturer were used in the setpoint calculations to determine the proper setpoints for the instruments. These manufacturer's drift values were also used in the calculations for determining as-found tolerances. Surveillance intervals were increased to 24 months, unless the historical drift data did not bound existing as-found tolerances. If the historical data was not bounding, either 18 month surveillance intervals were retained in the Technical Specifications and surveillance procedures, or the setpoints were revised to accommodate the larger drift.

2) SER Section 2.0, "Evaluation", Page 3:

*"The licensee has implemented a program to monitor the effects of a 24-month Calibration Cycle on the instrument drift as specified in GL 91-04. The purpose of this monitoring program is to provide a means to verify the assumptions made in the setpoint methodology with regard to instrument drift. The monitoring program also provides a method to determine the adequacy of the instruments surveillance intervals."*

## Attachment 2 (Cont.)

### 2) Clarification:

The Instrument Drift Program is an ongoing program which will monitor future surveillance procedure as-found and as-left data, and will incorporate new data into the drift study spread sheets with the existing drift data. The revised drift data mean, standard deviation, 95%/95% tolerance intervals, etc., will be compared with the existing drift data to ensure the conclusions in the drift study remain valid. There are currently no plans to make direct comparisons between the drift data and terms used in the setpoint calculations.

### 2) SR Section 2.0, "Evaluation", Page 3:

*"The ongoing monitoring program provides further assurance that unacceptable instrument drift will be evaluated immediately and the calibration interval and the instrument setpoint will be revised to account for any additional drift."*

### 3) Clarification:

Drift data will be taken once every 2 years during refueling outages. Evaluation of the data and the impact of the increased surveillance interval will be completed within 180 days after restart and any potential revisions to calibration intervals or setpoints will be made during this period. This period for completing the drift evaluations is well within the 18 month operating experience data for instrumentation drift.

### Attachment 3

#### **Withdrawal of Technical Specification Change Requests that are not Related to 24 Month Fuel Cycle Surveillance Extensions**

In addition to Technical Specification Change Requests for 24 month surveillance frequency extensions, Reference 1 also requested named Function changes and changes to the Allowable Values for determining operational status for the Reactor Coolant Pumps, Main Turbine, Main Feedwater Pumps, and for Emergency Feedwater Initiation. A change for the Control Room Isolation High Radiation setpoint from an allowable value to an approximate value was also requested in this submittal. These requests, as delineated below, are withdrawn and will be evaluated and resubmitted at a later date, if appropriate:

#### Withdrawal List

Table 3.3.1-1 The FUNCTION name for "Reactor Coolant Pump Power Monitor (RCPPM)" is changed to "Reactor Coolant Pumps," and the ALLOWABLE VALUE is changed to "More than one pump tripped."

Table 3.3.1-1 The FUNCTION name for "Main Turbine Trip (Control Oil Pressure)" is changed to "Main Turbine," and the ALLOWABLE VALUE is changed to "Turbine Tripped."

Table 3.3.1-1 The FUNCTION name for "Loss of Both Main Feedwater Pumps (Control Oil Pressure)" is changed to "Main Feedwater Pumps," and the ALLOWABLE VALUE is changed to "Both Pumps Tripped."

Table 3.3.11-1 The FUNCTION 1.a name for "EFW Initiation - Loss of MFW Pumps (Control Oil Pressure)" is changed to "EFW Initiation - Main Feedwater Pumps," and the ALLOWABLE VALUE is changed to "Both Pumps Tripped."

SR 3.3.16.3 The CHANNEL CALIBRATION setpoint for "Control Room Isolation" is changed from "Allowable Value less than or equal to two times background." to "approximately two times background."