



**Florida
Power**
CORPORATION

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Fire Protection Program

Dear Sir:

Florida Power Corporation (FPC) is revising the Crystal River Unit 3 Fire Protection Plan. During the review of the Plan and NRC correspondence, several statements were identified as being outdated and different from existing program activities. A summary of these differences and, as appropriate, the revised program statement, and justification is provided in the attachment. Revision 4 to the Fire Protection Plan will include these updated statements of program content and will be submitted to the NRC by August 30, 1988.

If you have any question please contact this office.

Sincerely,

Rolf C. Widell, Director
Nuclear Operations Site Support

RCW/REF/dhd
Attachment

xc: Regional Administrator, Region II

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A. Responsibility and Organization

The Fire Protection Program Review provided to the NRC on June 22, 1977, delineated the organization and responsibility associated with the control and implementation of the Fire Protection Program at CR-3. As part of the rewrite of the Fire Protection Plan, differences have been identified between the original Fire Protection Program Review organizational and responsibility functions as compared to existing conditions. These differences are the result of normal organizational growth and are due to enhancements in the control and implementation of Fire Protection Program functions.

The present positions within the FPC organization that are responsible for the program, and the authorities that are delegated to each of these positions to implement those responsibilities are delineated in Section 2.0 of Revision 4 to the Crystal River Unit 3 Fire Protection Plan. These organizational changes do not decrease the effectiveness of the Fire Protection Program or adversely affect the safe shutdown capability of the Unit.

B. Drills

Florida Power Corporation in a letter dated May 30, 1978, stated that unannounced fire drills would be critiqued by the plant safety and security management staffs.

A review of this statement identified the need to modify the critique process for fire drills described above. The individuals responsible for fire drill critiques, announced or unannounced, should be knowledgeable in fire fighting techniques and procedures. These individuals should have sufficient training and experience to be able to interpret and analyze the fire brigade performance. The management of the plant safety and security staffs do not have or require this type experience or training.

This statement of program intent was made the first year of operation when no dedicated fire protection staff was available at the plant site. Since that time a fire protection staff has been formed which contains trained and experienced fire protection professionals capable of providing the necessary fire drill critiques. Revision 4 to the Fire Protection Plan will stipulate that the Fire Protection Staff is responsible for all fire drill critiques, announced and unannounced.

This responsibility change does not decrease the effectiveness of the Fire Protection Program at CR-3 or adversely affect the safe shutdown capability of the Unit.

C. Training

Florida Power Corporation stated in the Fire Protection Program Review of 1977 the following:

The initial training received by the fire brigade consists of forty hours at the fire college and forty hours at the plant. It includes both classroom instruction and practical exercises in various aspects of fire fighting. Topics included in the fire brigade training course include fire fighting behavior, fundamentals of extinguishment, hose, fire streams, protective breathing apparatus, rescue, and equipment overhaul and maintenance. This course includes practical experience under fire conditions.

The present initial training program at CR-3 consists of a total of forty hours of instruction comprised of both classroom instruction and practical exercises in the various aspects of fire fighting. Topics included in the fire brigade training course are fire science and behavior, hoses and hose handling, fundamentals of fire extinguishment, portable extinguishers, ventilation, salvage and overhaul, emergency lighting, self contained breathing apparatus, search and rescue, fire detection and suppression systems, hazardous materials, and prefire-planning.

The fire brigade training program has evolved through direction provided by the Fire Protection Staff, changing requirements and plant needs. The forty hours of instructional time is standard in the industry and provides more than adequate training due to the use of qualified classroom instructors and fire fighting training facilities such as the State Fire College. The forty hour training program has been in effect for a number of years at CR-3 and the performance of the fire brigade has been satisfactory. A requalification program is provided to the fire brigade on a quarterly bases with the entire program content covered on a two year cycle. This change in the training program intent from 1977 has not decreased the effectiveness of the Fire Protection Program at CR-3 or adversely impacted the safe shutdown capability of the Unit.

D. Fire Brigade

Florida Power Corporation provided to the NRC on June 22, 1977, the Fire Protection Program Review. As a part of this Review, the Fire Brigade composition, management control, and availability was addressed as follows:

Responsibility for in-plant fire fighting is vested in the Fire Brigade, which consists of selected and trained maintenance personnel, shift supervisors and operators. The Nuclear Plant Fire Brigade is organized under the overall direction of the Maintenance Engineer. The Fire Brigade overall consists of nineteen members, and operating shifts are organized so that at least one member of the Fire Brigade is on site at any time. Additionally, Fire Brigade members are on call at all times, as is the Fire Brigade Chief or a designated alternate.

This statement is no longer accurate. The Nuclear Fire Brigade is presently organized under the direction of the Director, Nuclear Plant Operations. The overall size of the Nuclear Fire Brigade has grown to in excess of eighty trained members in order to provide shift complements consistent with the activities required to combat the most significant fire. The size of the Brigade is based upon the functions required to fight fires with adequate allowance for injuries. Crystal River Unit 3's fire brigade operating shift complement is 5 members, as required by Section 6 of Technical Specifications.

The Fire Protection Plan, Revision 4, outlines the Nuclear Fire Brigade organization, responsibilities and complement. Any changes to functions of the Fire Brigade will be reflected in the Fire Protection Plan and controlled in accordance with the provisions of the Plan.

The changes to the fire brigade presented here are enhancements to the 1977 statement and do not decrease the effectiveness of the Fire Protection Program at CR-3, or adversely affect the safe shutdown capability of the Unit.