

**Florida  
Power**  
CORPORATION

Walter S. Wilgus  
Vice President  
Nuclear Operations

April 25, 1988  
3F0.88-15

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  
Technical Specification Change Request No. 161, Revision 0  
Containment Isolation Valves

Dear Sir:

Florida Power Corporation (FPC) hereby submits Technical Specification Change Request No. (TSCRN) 161 requesting amendment to Appendix A of Operating License No. DPR-72. As part of this request, the proposed replacement pages for Appendix A are provided.

This submittal requests Table 3.6-1, Containment Isolation Valves, be removed from Technical Specifications (TS) and relocated to the FSAR. The removal of tabular listings from the TS is an area of improvement of TS that has been identified by the nuclear industry and the NRC. Surveillance 4.6.3.1.1 is being revised for clarification. Other specifications are being revised to delete the reference to the Containment Isolation Valve Table.

Currently, TS allow certain valves to be opened under administrative controls. Administrative control consists of a dedicated operator stationed at the valve in continuous communication with the control room with necessary parameters to rapidly isolate the penetration on a valid indication. No other valves would have this administration control applied to them unless NRC approval was first obtained.

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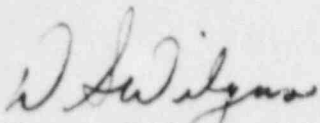
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April 25, 1988  
3F0488-15  
Page 2

This change request supercedes TSCRN 82, Supplement 3, dated December 31, 1984 with regard to Section II, Containment Isolation Valves.

An amendment application fee, check number 19619 for one hundred fifty dollars (\$150), as required by 10CFR170, has been included with this Change Request

Sincerely,



W. S. Wilgus, Vice President  
Nuclear Operations

JBC/dhd  
Attachment

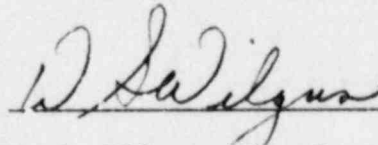
xc: Dr. J. Nelson Grace  
Regional Administrator, Region II

Mr. T.F. Stetka  
Senior Resident Inspector

STATE OF FLORIDA

COUNTY OF PINELLAS

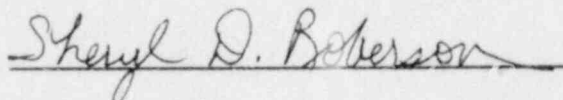
W. S. Wilgus states that he is the Vice President, Nuclear Operations for Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein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



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W. S. Wilgus, Vice President  
Nuclear Operations

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 25th day of April 1988.



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Notary Public

Notary Public, State of Florida at Large,

My Commission Expires:

NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXP JULY 22, 1989  
BONDED THRU GENERAL INS. UND.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER )

FLORIDA POWER CORPORATION )

DOCKET NO. 50-302 )

CERTIFICATE OF SERVICE

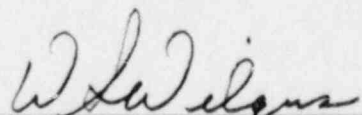
W. S. Wilgus deposes and says that the following has been served on the Designated State Representative and Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,  
Board of County Commissioners  
of Citrus County  
Citrus County Courthouse  
Inverness, FL 32650

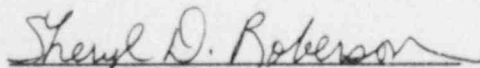
Administrator  
Radiological Health Services  
Department of Health and  
Rehabilitative Services  
1323 Winewood Blvd.  
Tallahassee, FL 32301

A copy of Technical Specification Change Request No. 161, Revision 0 requesting Amendment to Appendix A of Operating Licensing No. DPR-72.

FLORIDA POWER CORPORATION

  
W. S. Wilgus, Vice President  
Nuclear Operations

SWORN TO AND SUBSCRIBED BEFORE ME THIS 25TH DAY OF APRIL 1988.

  
Notary Public

Notary Public, State of Florida at Large,

My Commission Expires:

NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXP JULY 22, 1989  
BONDED THRU GENERAL INS. UND.

FLORIDA POWER CORPORATION  
CRYSTAL RIVER UNIT 3  
DOCKET NO. 50-302/LICENSE NO. DPR-72  
REQUEST NO. 161, REVISION 0  
CONTAINMENT ISOLATION VALVES

LICENSE DOCUMENT INVOLVED: TECHNICAL SPECIFICATIONS

PORTIONS: T.S. 3.6.1.1  
T.S. 3.6.3.1  
TABLE 3.6-1  
SURVEILLANCE 4.6.1.1.a.1  
SURVEILLANCE 4.6.3.1.1  
SURVEILLANCE 4.6.3.1.2

DESCRIPTION OF REQUEST:

This submittal requests Table 3.6-1, Containment Isolation Valves, be removed from Technical Specifications and relocated to the FSAR. Surveillance 4.6.3.1.1 is being revised for clarification. Specifications 4.6.1.1.a.1, 3.6.3.1, 4.6.3.1.1 and 4.6.3.1.2 are being revised to delete the reference to the Containment Isolation Valve Table.

REASON FOR REQUEST:

The removal of tabular listings from the Technical Specifications is an area of improvement of Technical Specifications that has been identified by the Atomic Industrial Forum (AIF) and the NRC.

EVALUATION OF REQUEST:

The operability of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Table 3.6-1, Containment Isolation Valves, will be removed from Technical Specifications and relocated to the FSAR. The requirement for containment isolation valve operability will still remain in Technical Specifications. The action statement and surveillance requirements will also remain in Technical Specifications. The relocation of this table is an administrative matter which would allow future changes to be made without a license amendment, which would relieve both the NRC and Florida Power Corporation (FPC) of an administrative burden. Maintaining the table in the FSAR would also assure that the information is still available to the operators.

Future changes to the table would only be implemented after review by the Plant Review Committee and Nuclear General Review Committee. An evaluation in accordance with 10CFR50.59 would also be performed.

The proposed change to Surveillance Requirement 4.6.3.1.1 clarifies that when work is done on a valve that would not affect the valve's performance, a valve stroke test is not required. Valve preventive maintenance or handwheel replacement which would not degrade valve performance, would not need a stroke test. Work which could affect valve performance would still require the retest, thus no existing safety margins are affected.

EVALUATION OF REQUEST: (cont'd)

References to the Containment Isolation Valve Table have been deleted in specifications 4.6.1.1.a.1, 3.6.3.1, 4.6.3.1.1 and 4.6.3.1.2. In summary, these changes are administrative in nature and are intended to update and improve the Technical Specifications; no question of safety is involved.

SHOLLY EVALUATION OF REQUEST:

Florida Power Corporation (FPC) proposes that this amendment does not involve a significant hazards consideration. The removal of the tabular listing of containment isolation valves from Technical Specifications has no impact on plant operation or safety. The Technical Specifications will continue to require containment isolation valves (CIV's) to be operable. Appropriate actions to be taken if the CIV's are inoperable will remain in Technical Specifications. The surveillance requirement in Technical Specifications will still require testing if work was performed on a valve which could affect the valve's performance.

Changes to the CIV table will be controlled under the provisions of 10CFR50.59 as a change to the facility.

Based on the above, FPC finds that the amendment will not:

1. Involve a significant increase in the probability or consequence of an accident previously evaluated because the removal of the containment isolation valve listing does not impact the existing valve operability requirements.
2. Create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change introduces no new mode of plant operation nor does it require physical modification to the plant.
3. Involve a significant reduction in the margin of safety. Any reduction in the margin of safety will be insignificant since the provisions of 10CFR50.59 will be applicable, and as such, an application for a license amendment will be submitted in accordance with 10CFR50.90.