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Florida Power

August 19, 1988 3F0888-14

U. S. Nuclear Regulatory Commission 101 Marietta Street N. W. Suite 2900 , ta, GA 30323

Attention: Dr. J. Nelson Grace

Subject: Crystal River Unit 3 Docket No. 50-302 Operating License No. DPR-72 Environmental Qualification of Feedwater Isolation Valves

Dear Sir:

In an August 8, 1988 letter (3F0888-06) Florida Power Corporation (FPC) reported the discovery of two valves in the Main Feedwater System (FWV-33 & FWV-36) which should have been qualified to withstand a high energy line break but were not. That letter also provided a description of the present valve configuration and provided justification for continued operation. Subsequent to that submittal, a walkdown of the valves was conducted to verify configuration and to assist planning of the corrective action. The compartment of one of the valve operators was limit switch disassembled for inspection. At that time it was discovered there differences from the original configuration description. were two The attached supplement to the original justification for continued differences discovered and provides describes the operation assurance that the valve operators will still provide an adequate level of protection until they can be replaced.

Should you have any questions, please contact this office.

Sincerely,

Rolf C. Widell Director, Nuclear Operations Site Support

AEF/RCW: Attachment

> xc: Senior Resident Inspector Document Control Desk Post Office Box 219 • Crystal River, Florida 32629 • Telephone (904) 795-3802 A Florida Progress Company

SUPPLEMENT TO JUSTIFICATION FOR CONTINUED OPERATION

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Subsequent to FPC's submittal of August 8, 1988 (3F0888-06), a walkdown of the motor operator for v lve FWV-33 was performed. The motor leads for the operator were observed to be a <u>taped</u> connection. This is contrary to the original statement that motor lead termination is by Raychem WSCF-N qualified splice. Thi condition most likely also exists for FWV-36. The terminations are enclosed to protect direct impingement of a steam environment. This along with the short operating time of less than one minute, provides adequate assurance of operability of the motor operator.

Another discrepancy noted is that the DC Motor Starters for FWV-33/-36 are enclosed by a NEMA $\underline{2}$ type enclosure, not a NEMA $\underline{4}$ as stated. Credit can be taken for the starter enclosure to protect against direct impingement of steam environment for the short duration that the starter must function. This does not alter the conclusion that adequate assurance of operability exists for the DC motor starter.

Thus, Florida Power Corporation considers the assessment of operability is unchanged from the original J.C.O and has a high degree of confidence the valves will perform their function for the postulated high energy line break event.