

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72

September 30, 1998
3F0998-15

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

Subject: Clarifications of License Amendment Number 163 Safety Evaluation

- References:
1. FPC to NRC Letter, 3F0697-10, dated June 14, 1997, Technical Specification Change Request Notice 210
 2. NRC to FPC Letter, 3N0198-10, dated January 24, 1998, Crystal River Unit 3 - Issuance of Amendment Re: Small Break Loss-Of-Coolant Accident Mitigation (TAC No. M98991)
 3. FPC to NRC Letter, 3F0298-02, dated February 20, 1998, License Amendment 163 (TAC No. M98991)

Dear Sir:

The purpose of this letter is to clarify the current licensing basis for the time necessary to start the Control Complex Chillers at Crystal River Unit 3 (CR-3) after a loss-of-offsite power. The Safety Evaluation (SE) that accompanied Amendment Number 163 (Reference 2) to CR-3 Operating License No. DPR-72 stated that these chillers were to be started within 1 hour. While this information was consistent with information initially provided to the NRC in Reference 1, certain aspects of the design, including the required start time of the control complex chillers, were not final at that time. Florida Power Corporation (FPC) considers the preliminary information to be the principal contributor to the need for this clarification. //

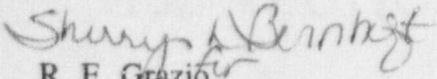
Upon receipt of Amendment 163 FPC reviewed the SE to identify all requirements and submitted a letter providing a status of each (Reference 3). Subsequently, FPC identified that the chiller start time discussed in the SE needed to be clarified. The CR-3 design and licensing basis is to start the chillers within 80 minutes and to manually load the chillers within 90 minutes after the start of a Small Break Loss-of-Coolant Accident (SBLOCA). The attachment to this letter provides additional information in support of these criteria. ACOJ

FPC does not consider that the SE needs to be formally amended. There are no new regulatory commitments made in this submittal.

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If you have any questions regarding this submittal, please contact Ms. Sherry Bernhoft, Manager, Nuclear Licensing at (352) 563-4566.

Sincerely,



R. E. Grazioplene
Director, Nuclear Regulatory Affairs

REG/rer
Attachment

xc: Regional Administrator
Senior Resident Inspector
NRR Project Manager

Attachment: Clarification to Amendment 163 Safety Evaluation Crystal River Unit 3
Operating License

ATTACHMENT
CLARIFICATION OF AMENDMENT 163 SAFETY EVALUATION
CRYSTAL RIVER UNIT 3 OPERATING LICENSE

This attachment clarifies the times for starting the Control Complex Chillers and applying cooling loads to the chillers. Reference is provided to the applicable submittals in which the information was discussed.

The following table summarizes the information in the FPC submittal dated June 14, 1997 (FPC to NRC letter 3F0697-10), regarding operation of the control complex chillers.

Page No.	Statement
Page 4	The 'B' Control Complex Chiller will be manually loaded on EDG-1B within one hour.
Page 5	Discusses starting 'A' train chiller and support systems within 1 hour.
Page 7	Discusses cross-connecting Emergency Feedwater (EFP ^M) within 1 hour to support securing EFP-1 to operate the 'A' train chiller for Control Complex (CC) cooling.
Page 8	EFP-1 will be secured before loading the 'A' CC chiller, which will occur within 1 hour.

The above table reflects that the June 14, 1997 submittal indicated the CC chillers would need to be started and to be providing cooling within 1 hour. The information contained on Page 13, of the SE is consistent with the information provided by the June 14, 1997 submittal. However, as the design evolved, FPC established that starting the chillers within 80 minutes and applying the cooling loads to the chillers within 90 minutes after the start of a Small Break Loss-of-Coolant Accident (SBLOCA), is acceptable. This time period of 80 minutes for starting a chiller, versus one hour, is reflected in later FPC submittals on this issue.

The following table summarizes these submittals and the statements made.

FPC Submission	Page No. / Section No. / Paragraph	Statement
3F0997-31, dated September 17, 1997	(a) Question No. 2 Response (b) Question No. 5 Response (c) Table 3B, Operator Action OA 12	(a) "With exception of starting the chiller within 80 minutes, all other actions are based on loss of adequate subcooling margin." (b) "The current analysis requires this action to be completed within 80 minutes of loss of offsite power." (c) "Verify Control Complex Chiller is running." Basis: "Required within 80 minutes to ensure control complex instrumentation remains within analyzed temperature ranges for instrument accuracy."
3F0997-30, dated September 25, 1997	Table 3B, Operator Action OA 12	OA 12 is to start the control complex chiller: "Required within 80 minutes." Basis: "Required within 80 minutes to ensure control complex instrumentation remains within analyzed temperature ranges for instrument accuracy."
3F1197-40, dated November 15, 1997	Response to Request Number 11	"Within at least 80 minutes, the operators would align EFP-2 to the 'A' train EFW flow path and secure EFP-1. The operator would then manually apply the load of the Control Complex chiller and pump, the spent fuel pump and its air handling fan, and LPI to establish ECCS recirculation injection from the reactor building sump."