

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.7.14.1 (continued)

Operating experience has shown significant differences between boron measured near the top of the pool and that measured elsewhere. As long as this SR is met, the analyzed events are fully bounded. The 7 day Frequency is acceptable because no major replenishment of pool water is expected to take place over this period of time.

REFERENCES

1. Criticality Safety Analysis of the Crystal River Unit 3 Pool A Spent Fuel Storage Rack, S. E. Turner, Southern Science, SS-162.
 2. Reanalysis of the Crystal River Pool B Spent Fuel Storage Racks With Boraflex Degradation, S. F. Turner, Holtec International, HI-982056, October 20, 1998. ~~Technical Specification Change Request 175, dated October 31, 1989.~~
 3. NRC Safety Evaluation Report for Amendment 134 to CR-3 Operating License, dated April 16, 1991.
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BASES (continued)

SURVEILLANCE
REQUIREMENTS

SR 3.7.15.1

Verification by administrative means that initial enrichment and burnup of fuel assemblies in accordance with Figure 3.7.15-1 and Figure 3.7.15-2, and Figure 3.7.15-3 is required prior to storage of spent fuel in storage pool A or pool B (as applicable). This surveillance ensures that fuel enrichment limits, as specified in the criticality safety analysis (Ref. 2), are not exceeded. The surveillance Frequency (prior to storage in high density region of the fuel storage pool) is appropriate since the initial fuel enrichment and burnup cannot change after removal from the core.

REFERENCES

1. Criticality Safety Evaluation of the Pool A Spent Fuel Storage Racks in Crystal River Unit 3 with Fuel of 5.0% Enrichment, S. E. Turner, Holtec Report HI 931111, December 1993.
 2. Reanalysis of the Crystal River Pool B Spent Fuel Storage Racks With Boraflex Degradation, S. F. Turner, Holtec International, HI-982056, October 20, 1998. ~~Crystal River Unit 3 Spent Fuel Storage Pool B Criticality Analysis, W. A. Wittkopf, L. A. Hassler, B&W Fuel Company, BAW 2209P, October 1993.~~
 3. NUREG 0800, Standard Review Plan, Section 9.1.1 and 9.1.2, Rev.2, July 1981.
 4. 10 CFR 100.
 5. CR-3 FSAR, Section 9.6.
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**FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72**

ATTACHMENT C

**LICENSE AMENDMENT REQUEST #245, REVISION 0
Revision to Licensing Basis - Methodology Change for Boraflex Degradation**

**Holtec Report, HI-982056, "Reanalysis of The Crystal River Pool B Spent
Fuel Storage Racks with Boraflex Degradation," October 20, 1998**