

November 17, 1998 3F1198-13

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

Subject:

License Amendment Request #221, Revision 2, "B" Once Through Steam

Generator Tube Surveillance Program (TAC No. M99721)

References:

1. FPC to NRC letter, 3F1097-21, dated October 1, 1997

2. FPC to NRC letter, 3F0498-02, dated April 23, 1998

Dear Sir:

The purpose of this letter is to submit License Amendment Request (LAR) #221, Revision 2, proposing a change to Improved Technical Specification (ITS) 5.7.2, "Special Reports." ITS 5.7.2.6, as proposed in References 1 and 2 (LAR #221, Revision 0 and LAR #221, Revision 1), includes special reporting requirements associated with the "B" Once Through Steam Generator (OTSG) inservice inspections. The proposed item required submittal of a summary of analyses, based on a probabilistic structural integrity assessment for the first span pit-like intergranular attack (IGA) indications 90 days after startup (breaker closure). Florida Power Corporation (FPC) is proposing herein to change the type of structural integrity assessment required from probabilistic to deterministic. This change is consistent with the latest industry guidance provided in Draft Regulatory Guide DG-1074, "Steam Generator Tube Integrity."

Revised ITS page 5.0-29A is included as part of this submittal. The previous conclusion of No Significant Hazards Considerations, as noticed in the Federal Register (62 FR 54873-54874) will not be affected by this proposed change in assessment approach.

This letter establishes no new regulatory commitments. If you have any questions regarding this submittal, please contact Mr. Sid Powell, Manager, Nuclear Licensing at (352) 563-4883.

Sincerely,

J.J. Holden Director

Site Nuclear Operations

JJH/pmp/lvc Attachment

xc:

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Regional Administrator, Region II

NRR Project Manager Senior Resident Inspector

CRYSTAL RIVER ENERGY COMPLEX: 15760 W. Power Line Street • Crystal River, Florida 34428-6708 • (352) 795-6486

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STATE OF FLORIDA

COUNTY OF CITRUS

John J. Holden states that he is the Director, Site 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.

John J. Holden

Director

Site Nuclear Operations

Sworn to and subscribed before me this 17th day of November, 1998, by John J. Holden.

Signature of Motary Public State of Florida

Lathy R. Tyles

Kathy R. Tyler
MY COMMISSION & CC727/902 EXPIRES
May 11, 2002
BONDED THRU TROY FAIN INSURANCE, INC.

Kathy R. Tyler

(Print, type, or stamp Commissioned Name of Notary Public)

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