

October 24, 1997

Mr. Roy A. Anderson  
Senior Vice President  
Nuclear Operations  
Florida Power Corporation  
ATTN: Manager, Nuclear Licensing  
Crystal River Energy Complex (SA2A)  
15760 W. Power Line Street  
Crystal River, Florida 34428-6708

SUBJECT: CRYSTAL RIVER NUCLEAR GENERATING PLANT UNIT 3 - USI A-46 Audit

Dear Mr. Anderson:

During the week of November 3, 1997, the NRC staff will be performing an audit to verify FPC's implementation of the USI A-46 program. Specifically, the staff's audit will focus on determining if the A-46 program was completed and documented in accordance with FPC's commitments in the plant-specific procedures for CR-3 docketed on September 16, 1994, and will evaluate the open issues identified in the staff's safety evaluation, dated May 2, 1996.

Enclosed is a copy of the staff's audit plan. If you have any questions regarding this matter, please write or call me at (301) 415-1471.

Sincerely,

original signed by S. Flanders for  
L. Raghavan, Project Manager  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-302

Enclosure: USI A-46 Audit Plan

cc: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in black ink, appearing to read "L. Raghavan", is written over the typed name.

L. Raghavan, Project Manager  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-302

Enclosure: USI A-46 Audit Plan

cc: See next page

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### CRYSTAL RIVER UNIT NO. 3

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Atlanta, GA 30303-3415

Mr. Kerry Landis  
U.S. Nuclear Regulatory Commission  
61 Forsyth Street, SW., Suite 23T85  
Atlanta, GA 30303-3415

Plan for Performing Plant-Specific Audit Review of the Licensee's  
Implementation of the Resolution for USI A-46 Program at  
Crystal River Nuclear Generating Plant Unit 3 (CR-3)  
Week of November 3-7, 1997

1. Purpose:

The purpose of the audit review is to verify that the licensee's implementation of the USI A-46 program was completed and documented in accordance with the licensee's commitments in the Plant-Specific Procedure for CR-3, Rev. 1, docketed on September 16, 1994 (CR-3 PSP), supplemented by the NRC staff's Safety Evaluation on CR-3 Criteria and Procedures, dated May 2, 1996.

2. Audit Team:

The audit team will be led by a member from Mechanical Engineering Branch (EMEB) and include one member from Civil Engineering & Geoscience Branch (ECGB). A contractor from Brookhaven National Laboratory will participate in this audit.

Note: Conduct of the audit has been coordinated with the NRR project manager, Region II, and the Resident Inspectors.

3. Major Activities:

Note: Prior to the site visit, the audit team has reviewed the licensee's summary report and responses to the staff's request for additional information.

The major elements of the audit team activities are identified below:

- (1) Review overall program implementation.
- (2) Review resolution of all open issues documented in the staff's Safety Evaluation dated May 2, 1996.
- (3) Discuss the licensee's response, dated March 27 and August 1, 1997, to the staff's request for additional information (RAIs), dated January 28, 1997.
- (4) Review the licensee's general approach for equipment anchorage seismic adequacy verification in accordance with the criteria and procedures delineated in Section 4.4 of GIP-2.
- (5) Select sample equipment items from the safe shutdown equipment list included in the licensee's correspondence in Item (3) above and from the licensee's Seismic Evaluation Report, Rev. 0, docketed on January 2, 1996. The sample will include, but not limited to, equipment from the following two special categories: (a) equipment considered to have met the applicable GIP-2 caveats, and (b) equipment listed in the seismic evaluation outlier summary table. For the selected equipment, the audit team will verify, by reviewing the detailed documentation and/or walkdown inspection, the seismic adequacy of these equipment items by focusing on the following aspects, as applicable:
  - a. Verify that the licensee has correctly applied or interpreted applicability of the GIP-2 caveats wherever the GIP-2 Bounding Spectrum or Generic Equipment Ruggedness Spectra were used as the basis for seismic capacity. Emphasis will be given to verifying that the seismic review engineers have considered all GIP-2 caveats before deciding on their applicability.

- b. Verify that the licensee has correctly determined and compared equipment seismic capacity and demand.
  - c. Verify that the licensee has correctly determined equipment anchorage adequacy.
  - d. Verify that the applicable caveats for each equipment category are met and there are no unusual design details which are not addressed by the equipment caveats, and which could compromise the seismic adequacy of the equipment.
  - e. Verify that no seismic interaction concerns exist.
  - f. Verify adequate resolution of equipment outliers (including the schedule for resolution), and/or justification provided for not resolving outliers based on safety implications and impact on licensing basis requirements.
- (6) Review, by sampling, the relay portion of the program to verify that essential relays that affect equipment in Safe Shutdown Equipment List (SSEL) have been addressed and evaluated for functionality during and after the safe shutdown earthquake (SSE) in accordance with the general framework of criteria established in the staff's Safety Evaluation dated May 2, 1996.
- (7) Review, by sampling, the tanks and heat exchanger portion of the program to verify that criteria and procedures delineated in EPRI Report NP-5228, Revision 1, Volume 4, were adequately implemented.

- (8) Review, by sampling, the seismic adequacy of the cable and conduit raceways, including supports, in accordance with the CR-3 original design criteria and procedures.