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

February 9, 1998
3F0298-09

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

Subject: Non-Restart Follow-up Items

References: 1. NRC to FPC Confirmatory Action Letter, dated March 4, 1997

2. NRC Generic Letter 91-18, Revision 1

Dear Sir:

The purpose of this letter is to provide the NRC with those actions which are being carried forward as non-restart follow-up items for which FPC committed a future NRC submittal or where NRC action on an FPC submittal is pending.

Restart Issues Process

At the beginning of this outage, FPC developed issue screening criteria which were used as the basis for determining whether identified items would be classified as restart issues. The screening process was proceduralized (NOD-57) and is the basis whereby each item was assessed as being either a restart or a non-restart issue. This restart list included items addressed in the Confirmatory Action Letter (Reference 1), FPC's Corrective Action Program, System Readiness Review program and NRC restart items. Each issue was evaluated against the restart criteria for restart determination. Further, for each of the activities determined to be a restart issue, a "Restart Closure Package" was developed and, upon completion, provided to the NRC for their review. The identified restart issues are closed. NRC inspections have verified that FPC restart activities have adequately addressed the issues. Items that were evaluated against the issue screening criteria, and determined not to be restart related, are being managed and tracked in accordance with FPC processes and practices for resolution

Non-Restart Follow-up Items

As noted above, the restart effort at CR-3 resolved and corrected issues that were both restart and non-restart actions. Non-restart actions that were not completed are being tracked for post restart closure.

FPC recently revised their processes to incorporate the guidance provided in NRC Generic Letter (GL) 91-18, Revision 1. Subsequently, a number of issues have been evaluated and were found to meet the criteria of GL 91-18, Rev. 1. Each of these items has been evaluated in accordance with FPC's 10CFR50.59 process and the Corrective Action Program. These issues are being managed as actions which will be completed post restart. This information has been previously discussed with the NRC and provided in other forums. License amendments are also being tracked as post restart follow-up actions with the NRC. Resolution of remaining plant design issues are also being carried forward.

Issues for which FPC has committed a future NRC submittal or where NRC action is pending are summarized in Attachment A. FPC is working with the NRC staff to establish firm request dates for NRC action where request dates are not included in Attachment A.

With the closure of MCAP II, the remaining eleven actions were evaluated and concluded not to be restart related. Each of these former MCAP II actions has been rolled into either the Long Range Business Plan or the Corrective Action Program for resolution post restart.

Commitments contained in this letter are described in Attachment B. If you have any questions regarding these matters, please call me at (352) 563-4477.

Sincerely,

John J. Holden, Director
Site Nuclear Operations

JJH/mh
Attachments

cc: Johns P. Jaudon, NRC Director, Division of Reactor Safety
NRR Project Manager
Senior Resident Inspector
Regional Administrator, Region II

Non-Restart Follow-up Issues

I. License Amendments

1. License Amendment Request (LAR) 214 - Request for Decay Heat Removal Requirements in Mode 4, submitted 10/7/97. FPC requested in the submittal that the NRC consider this license amendment and provide approval as soon as possible.

2. LAR 217 - Fan Logic Modification to AHF-1C Motor Control Center ES-MCC-3AB, submitted 10/4/97. FPC requested in the submittal that this license amendment be approved by 2/16/98.

3. LAR 218 - Revision of the Makeup System Letdown Line Failure Accident Analysis, submitted 9/9/97.

4. LAR 221 - "B" OTSG Tube Surveillance Program, submitted 10/1/97. FPC requested in the submittal that this license amendment be approved by 9/30/98.

5. LAR 222 - Control Room Emergency Ventilation and Emergency Filters, submitted 12/5/97, to be revised 6 months after restart to address NRC requested items. FPC requested in the submittal that this license amendment be approved prior to Refueling Outage 11, which is currently scheduled for the fourth quarter of 1999.

6. LAR 223 - Post-LOCA Boron Precipitation Prevention, submitted 10/31/97. Supplemental information will be provided on final calculations by 2/28/98.

7. LAR 224 - Reactor Building Fan Starting Logic Modification, submitted 12/5/97. FPC requested in the submittal that this license amendment be approved by 2/13/98.

8. LAR 225 - Protection Against Dynamic Effects of LOCA, scheduled for submittal 5/29/98.

9. LAR 228 - EFP-1 Service Factor, scheduled for submittal by 7/15/98.

10. LAR 229 - DHV- 34, - 35 position, scheduled for submittal by 10/16/98 (FPC to NRC letter 3F0298-11, dated 2/6/98).

II. Design Issues Summary

1. Appendix R issues

   - Appendix R program documentation (design drawings and Fire study update of miscellaneous items) to be updated 3/31/98 (LER 97-046-00, LER 97-035-00).

   - Actions to resolve Thermo-Lag issues (sprinklers, rerouting circuitry, emergency lighting) to be complete by 11/30/2000.

   - Fire barriers and penetration seals - upgrade and enhance the ability of CR-3 to document and maintain the design basis of penetrations seals. Completion date to be established based upon future NRC interaction (NRC IFI 97-11-09).

2. Large Bore Piping qualification - FPC plans to perform a comprehensive and rigorous inspection, revalidation and/or requalification of CR-3 safety-related large bore piping and pipe supports during the next 4-6 years (LER 97-040-00). It will also address jet impingement concerns as part of item 3. A schedule for completion will be established by 6/30/98.

3. Protection against dynamic effects of LOCA - provide justification for use of GL 87-11 and NUREG/CR-2913 as the licensing basis for CR-3 and/or propose additional modifications to be completed prior to startup from Refueling Outage 11 (FPC to NRC letter 3F0198-34, dated 1/23/98).

4. USI A-46 resolution

   - Complete resolution of all outliers by restart from Refueling Outage 11 and submit confirmation of resolution to the NRC (FPC to NRC letter 3F1297-24, dated 12/16/97).

   - Conduct a confirmatory self-assessment (audit) of the USI A-46 program by restart from Refueling Outage 11 and forward results of the audit to the NRC (FPC to NRC letter 3F1297-24, dated 12/16/97).

5. Waste (gas and liquid) disposal tanks outlet piping - to be upgraded to seismic class 1 prior to restart from the next scheduled Refueling Outage 11R (LER 97-038-00).

6. RCS attached piping - perform a Class 1 fatigue analysis for specified RCS attachment piping and revise affected design and licensing basis documents by 11/30/98 (FPC to NRC letter 3F1197-24, dated 11/21/97).

7. Remaining EFIC/EFW modifications will be completed by the end of Refueling Outage 11 (FPC to NRC letter 3F1196-07, dated 11/4/96).

8. Cable ampacity qualification - evaluate cable sizing and cable remaining qualified life. Evaluation to be completed by the end of Refueling Outage 11.

9. Boron precipitation - Hot leg injection, FPC to provide a submittal on this method for boron precipitation mitigation by 2/27/98 (FPC to NRC letter 3F0198-44, dated 1/31/98).

10. HPI throttling and crossover line - the evaluations of cross-tie designs will be completed in time for both the cross-ties and passive flow control devices to be installed during Refueling Outage 11R (FPC to NRC letter 3F0997-27, dated 9/17/97).

11. EDG upgrades/DG Driven EFW Pump - FPC will implement the permanent actions to address EDG capacity limitations by the end of Refueling Outage 11. The two primary options under consideration are either to modify the existing diesels or install a diesel driven EFW pump (FPC to NRC letter 3F0697-10, dated 6/14/97).

12. CCHE issues resolution

    - Perform an additional control room dose analysis for steam generator tube rupture (SGTR) events using methods and assumptions within SRP 15.6.3 as guidance. Results of the analysis to be submitted to the NRC with the revised control room habitability report to demonstrate compliance with 10CFR50, Appendix A, GDC 19, by 8/14/98 (FPC to NRC letter 3F0198-26, dated 1/14/98).

    - Following receipt of NRC approval of the Control Room Habitability Report and LAR 222, complete modifications and/or procedures determined by FPC to implement the approved design and licensing basis for CR-3 control room habitability prior to startup from Refueling Outage 11 (FPC letter to NRC 3F0198-26, dated 1/14/98).

13. RG 1.97 Instrumentation Upgrades - modify the power supply for the SPDS to separate it into a train "A" and train "B" redundant system, powered from safety-related inverters which are backed up by the station standby power sources during Refueling Outage 11 (FPC to NRC letter 3F0797-21, dated 7/29/97).

14. LPI crosstie and HPI/LPI performance - analyze HPI/LPI system performance (including the LPI crossover mode) and consider possible engineering solutions to address system performance (to include valve positioning for DHV-5, -6, -34, -35, -110, and -111). These actions are to be completed by 10/16/98 (FPC to NRC letter 3F0298-11, dated 2/6/98).

15. Outstanding JCOs will be resolved in a timely manner. LARs, modifications, or other engineering analyses will be conducted to resolve nonconformances documented in FPC Deficiency Report/JCO process (John Paul Cowan to Chairman Jackson, November 1997).

16. Security video capture system - to be installed to detect intruder presence prior to generating/receiving an alarm indication by 4/17/98 (FPC to NRC letter 3F0198-46, dated 1/30/98).

17. Calculations

    - FPC is developing an Analysis/Calculation Upgrade Program. A program plan is being developed to include scope, prioritization, schedule, and methodology. The plan will be completed by 6/19/98 and implementation will begin thereafter. By 6/19/98, FPC will provide the schedule for completion of the program to the NRC.

    - Drift calculations - evaluate instrument drift data and impact of increased surveillance intervals and make any necessary revisions to calibration intervals or setpoints 180 days after startup from Refueling Outage 11 (FPC to NRC letter 3F0797-25, dated 7/21/97).

III. FSAR Revision 25

To be submitted July 1998 (FPC/NRC meeting 1/12/98).

FPC Commitments

The following table identifies those actions committed to by Florida Power Corporation in this document. Any other actions discussed in the submittal represent intended or planned actions by Florida Power Corporation. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager, Nuclear Licensing of any questions regarding this document or any associated regulatory commitments.

Commitment	Due Date
Submit LAR 228 to the NRC - EFF-1 Service Factor.	July 15, 1998
A schedule for completion of Large Bore piping qualification will be established.	June 30, 1998
Evaluate cable sizing and cable remaining qualified life.	Complete by end of Refueling Outage 11.
FPC is developing an Analysis/Calculation Upgrade Program. A program plan is being developed to include scope, prioritization, schedule and methodology.	The plan will be completed by June 19, 1998 and implementation will begin thereafter. FPC will provide to the NRC the schedule for completion of the program by June 19, 1998.
Actions to resolve Thermo-Lag issues are to be completed.	November 30, 2000