

**Florida
Power**

CORPORATION
Crystal River Unit 3
Docket No. 60-302
Operating License No. DPR-72

December 3, 1997
3F1297-25

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

Subject: Integrated Safety Assessment of Current Outage Modifications

Reference: FPC to NRC letter (3F0697-10) dated June 14, 1997, "Technical Specification Change Request Notice 210"

Dear Sir:

The purpose of this letter is to provide the NRC with the results of an Integrated Safety Assessment performed by a multi-disciplined team formed by Florida Power Corporation (FPC). The team reviewed the modifications and Emergency Operating Procedure (EOP) changes to assess the impact on the Final Safety Analysis Report (FSAR) Chapter 14 accidents and events relative to operator actions, operator burden, and safety margins.

The goal of this safety assessment was to ensure that the modifications made during the outage to restore safety margins in the plant did not collectively or individually adversely effect the mitigation actions by operators and support staffs. The safety assessments from all of the Emergency Operating Procedures were reviewed along with modifications which effected the mitigation strategy of the accidents and events to ensure cross-system and department dependencies were adequately considered.

The team was comprised of personnel from Operations, Design Engineering, Nuclear Plant Technical Support (Systems Engineering), the Nuclear Safety Analysis Group, and Nuclear Licensing. The team was led by a senior manager with previous senior reactor operator (SRO), licensing, and engineering management experience. He is also Chairman of the Plant Review Committee.

The review was performed to supplement the Startup Team Solution Set Safety Assessment which was incorporated as Attachment B to the referenced submittal. This review evaluated the impact of modifications and other changes not considered in the earlier assessment.

CRYSTAL RIVER ENERGY COMPLEX: 15760 W. Power Line Street • Crystal River, Florida 34428-6708 • (352) 306-1111
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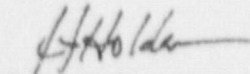


The results of the activities of the Integrated Verification Team culminated in the conclusion that:

- the modifications and EOP changes do not adversely impact the FSAR Chapter 14 safety analyses,
- the changes enhance the ability of the operator to prevent and mitigate accidents,
- no additional dependencies were created, and
- operator burden remains at an acceptable level.

There are no commitments made in this letter. This report is provided for information; NRC approval is not required. If you have any questions, please contact Mr. David Kunsemiller, Manager, Nuclear Licensing at (352) 563-4566.

Sincerely,



John J. Holden
Director, Site Nuclear Operations

JJH:aef
Attachment

xc: Regional Administrator, Region II
Johns Jaudon, Region II
Senior Resident Inspector
NRR Project Manager