

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

December 16, 1997
3F1297-45

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

Subject: Emergency Operating Procedure (EOP) Inspection
Additional Information Regarding MODE 2 Issues

Reference: NRC EOP Inspection - Exit Meeting - December 12, 1997

Dear Sir:

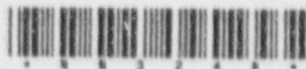
The purpose of this letter is to confirm the Mode 2 EOP issues discussed with NRC Region II management on December 15, 1997, as a result of the NRC Region II EOP inspections conducted at Crystal River Unit 3 (CR-3) during the weeks of October 20 and December 8, 1997. Each of these issues is currently being evaluated and scheduled to be addressed prior to MODE 2. Information will be available for NRC review by January 5, 1998. If information becomes available sooner, it will be provided to the lead NRC EOP inspector. If, during the evaluations, problems are identified which impact the schedules, the NRC will be immediately informed.

1. Mission Dose Assessments

Florida Power Corporation (FPC) is currently evaluating the steps in the EOPs directing personnel to perform actions outside the control complex habitability envelope (CCHE) for potential radiation hazards. FPC will evaluate the licensing basis and supporting documentation for radiation doses, as it relates to these actions, and will address any problems noted during the evaluation. 190000

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2. Technical Support Center (TSC) Guidelines

FPC has identified those places in the EOPs where the TSC is relied upon for direction. FPC will establish appropriate guidance documents for TSC personnel to perform these actions.

3. Support Organization Staffing

FPC has identified those EOP steps which request actions from support organizations such as Chemistry, Health Physics, and Maintenance. FPC will ensure a sufficient number of qualified personnel are available to perform the activities required by the EOP steps.

4. Technical Justification for Technical Bases Document (TBD) Deviations

Additional information supporting the technical justification for each of the following three inspection issues is being compiled and evaluated. FPC will ensure the EOPs have adequate technical justification to support these issues.

Control Rod Drive Breaker Re-closure

In the event a full group of control rods does not drop after a reactor trip, EOP-02, "Vital System Status Verification," and EOP-06, "Steam Generator Tube Rupture," direct the operators to open, and then re-close the breakers which supply power to the control rod drive system. The EOP/TBD cross-step deviation document does not contain adequate technical justification for re-closing these breakers with loads on their respective busses.

EOP-03 Branch Step for Small Break LOCA, No High Pressure Injection

In a Small Break Loss Of Coolant Accident (LOCA) scenario with no High Pressure Injection (HPI) available (as reflected in the TBD), additional justification is necessary for the sequence location of the step for establishing cooldown in EOP-03, "Loss of Subcooling Margin."

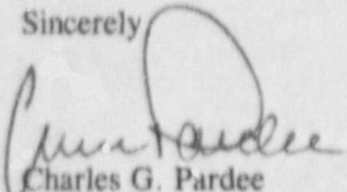
Low Pressure Injection Cross-Tie

The CR-3 EOPs do not direct the operators to cross-tie the Low Pressure Injection (LPI) trains during certain emergency core cooling system (ECCS) scenarios as recommended by the B&WOG TBD and as discussed in the CR-3 Final Safety Analysis Report (FSAR).

Commitments in this letter are described in Attachment A.

If you have any questions regarding this information, please contact Mr. Brian Gutherman at (352) 795-0504, extension 6264 or Mr. Rolf Widell at (352) 795-0504, extension 6104.

Sincerely



Charles G. Pardee

Director, Nuclear Plant Operations

CGP/BG

Attachment

cc: Regional Administrator, Region II
Senior Resident Inspector
Walt Rogers, USNRC Region II
NRR Project Manager

Attachment A

List of Commitments

Commitment	Due Date
FPC will evaluate the licensing basis and supporting documentation for radiation doses as it relates to personnel performing actions outside of the CCHE and will address any problems noted during the evaluation.	MODE 2
FPC will establish appropriate guidance documents for TSC personnel to perform the actions described in the EOPs.	MODE 2
FPC will ensure a sufficient number of qualified personnel are available to perform activities required by the EOP steps.	MODE 2
FPC will ensure the EOPs have adequate technical justification to support the EOP Inspection issues involving CRD breaker reclosure, SBLOCA with no HPI, and LPI cross- ie.	MODE 2