

**Florida
Power**
CORPORATION

April 24, 1986
3F0486-13

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Operating License Change Request No. 144
Proposed License Amendment - GDC 4

Dear Sir:

Florida Power Corporation (FPC) submitted our most recent request for exemption from General Design Criterion 4 (GDC-4) of Appendix A, 10CFR50 on January 21, 1986. The purpose of that request was to allow the optimization of the Reactor Coolant Pump (RCP) support configuration through the utilization of Leak-Before-Break (LBB) Methodology. On April 11, 1986, FPC was notified, concurrent with the publication of changes to GDC-4 that the accompanying supplementary information indicated the application of LBB concepts for heavy component supports should be considered an unreviewed safety question. The supplementary information further indicated that where an unreviewed safety question is involved, a request to amend the license should be submitted. As a result of these recent changes to GDC-4 and accompanying statements of consideration, please treat the existing FPC exemption request as a request for licensee amendment pursuant to 10CFR50.59(c).

In order to facilitate the processing of this request pursuant to 10CFR50.92, FPC has provided, in Attachment A, a proposed amendment to the license and the supporting Sholly evaluation for this amendment. This proposed amendment would add a license condition stating that the design and licensing basis of the reactor coolant pump supports for Crystal River Unit 3 need not include consideration of the effects of postulated pipe ruptures of the primary reactor coolant loop piping.

It is requested that the noticing of this license amendment be treated as an emergency since the lack of prompt action will result in a plant shutdown. Further explanation of this situation is provided as follows. Crystal River Unit 3 is currently in an unplanned outage to repair Reactor Coolant pumps. Entry into Mode 4 (the mode which the RCP supports required by Technical Specifications must be operable) could occur as early as May 15, 1986. The normal noticing period for license amendments will not accommodate this schedule.

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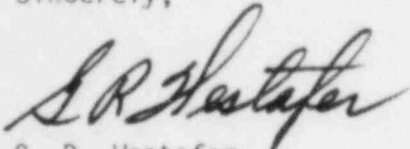
April 24, 1986
Page 2
3F0486-13

In order to avoid this emergency situation, FPC had expended considerable efforts towards resolving this issue. These efforts have included:

1. Submittal of the original request for exemption from GDC-4 on February 1, 1985.
2. A series of several meetings (3) and submittals (7) between the NRC staff and FPC since February 1, 1985 (listed among the 14 references of Attachment B).
3. Parallel pursuit of acceptance for the optimized RCP support configuration which would allow for NRC approval either under the modified rule or as an exemption from GDC-4.
4. Submittal of a January 21, 1986 request for the NRC to approve by March 1, 1986 the RCP support configuration. This submittal provided the necessary exemption evaluations pursuant to recently modified 10CFR50.12.

The final rule which modified General Design Criterion 4 of Appendix A, 10CFR50 was published on April 11, 1986. The effective date for this final rule is May 12, 1986. As a result the NRC has determined informally that the FPC request requires a license amendment and can not be treated as an exemption. FPC was not made aware of this NRC intention until April 11, 1986. Nevertheless, FPC has moved diligently since that time to prepare this submittal in as timely a manner as possible. We would appreciate your similar timely support in processing this amendment in an expeditious manner. If FPC can facilitate your staff efforts in any way, please contact this office.

Sincerely,



G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

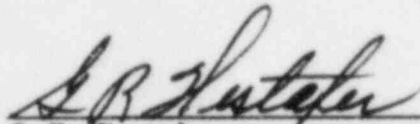
DGG:jk

Attachments

xc: Dr. J. Nelson Grace
Regional Administrator, Region II
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 2900
Atlanta, GA 30323

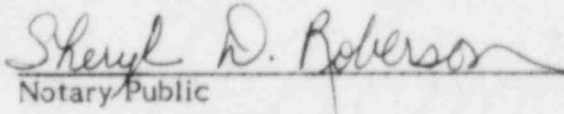
STATE OF FLORIDA
COUNTY OF PINELLAS

G. R. Westafer states that he is the Manager, Nuclear Operations Licensing and Fuel Management 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.



G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 24th day of April, 1986.



Notary Public

Notary Public, State of Florida at Large,

My Commission Expires:

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP JULY 22, 1989
BONDED THRU GENERAL INS. UND.



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF)
) DOCKET No. 50-302
FLORIDA POWER CORPORATION)

CERTIFICATE OF SERVICE

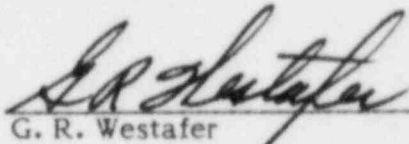
G. R. Westafer deposes and says that the following has been served on the Designated State Representative and the Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,
Board of County Commissioners
of Citrus County
Citrus County Courthouse
Inverness, FL 32650

Administrator
Radiological Health Services
Department of Health and
Rehabilitative Services
1323 Winewood Blvd.
Tallahassee, FL 32301

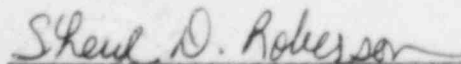
A copy of the request for amendment to Operating License No. DPR-72 (Change Request No. 144).

FLORIDA POWER CORPORATION



G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

SWORN TO AND SUBSCRIBED BEFORE ME THIS 24th DAY OF APRIL 1986.


Notary Public

Notary Public, State of Florida at Large

My Commission Expires:

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP JULY 22, 1989
BONDED THRU GENERAL INS. UND.

(NOTARIAL SEAL)