

ATTACHMENT B

**FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72**

**REVISED BASES PAGE
(STRIKEOUT AND HIGHLIGHT FONT)**

Deletions are indicated by ~~strikeout~~.
Additional and replacement text are indicated by shading.

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.8.2.1 (continued)

source to transfer to. SR 3.8.1.9 and SR 3.8.1.10 are also not required to be met since the ability to respond to ES actuations in other than MODES 1, 2, 3 or 4 is not a requirement for CR-3.

This SR is modified by a Note. The NOTE indicates SRs 3.8.1.3, 3.8.1.8, and 3.8.1.11 are not required to be performed to comply with SR 3.8.2.1. The reason for the Note is to preclude situations in which the OPERABLE EDG would be paralleled with the offsite power network or rendered inoperable during performance of SRs. With limited AC sources available, a single event could compromise both the required offsite circuit and the EDG. It is the intent that these SRs must still be capable of being met, but actual performance is not required. Refer to the Bases for LCO 3.8.1 for a discussion of each SR.

Additionally, the impact of entering the ACTIONS of this Specification during Surveillance testing was evaluated as part of ITS implementation and a unique situation was discovered relative to the monthly EDG testing performed as part of surveillance procedures SP-354A and SP-354B and the MODES and Conditions addressed by this Specification. The EDG tear down and inspection is periodically performed during MODES 5 and 6 outages, typically taking in excess of one month to complete. Thus, it was concluded the probability of CR-3 could coincidentally having have only one OPERABLE EDG and being required to perform SP-354 was high. This created a concern since certain portions of SP-354 render the EDG inoperable, requiring entry into the ACTIONS of this Specification. Required Action B.3 requires action be initiated immediately to restore the EDG to OPERABLE status. Thus, a situation is established in which SP-354 is performed, the ACTIONS are entered, SP-354 is immediately terminated (in order to restore OPERABILITY of the EDG). In this case, SP-354 could never be performed.

The need to perform SP-354 was evaluated in light of this concern. It was decided that since the periods of inoperability for the performance of the portions of SP-354 associated with SR 3.8.1.2 and 3.8.1.6 were brief and the SRs provided confidence in the OPERABILITY of the EDG, the SP should be performed. Expediently performing the portions of SP-354 associated with SR 3.8.1.2 and 3.8.1.6 during these MODES satisfies the intent of Required Action B.3 and is therefore acceptable. For MODE 5 and 6 surveillance testing performed in accordance with SP-354 to meet SR 3.8.1.3 will be performed at the frequency of SR 3.8.1.3 only when both EDG trains are operable.

ATTACHMENT C

**FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NUMBER 50-302 / LICENSE NUMBER DPR-72**

**REVISED BASES PAGE
(REVISION BAR FONT)**

ATTACHMENT TO LICENSE AMENDMENT NO. _____

FACILITY OPERATING LICENSE NO. DPR-72

DOCKET NO. 50-302

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

Remove

3.3-21
B 3.3-71
B 3.8-17
B 3.8-29

Replace

3.3-21
B 3.3-71
B 3.8-17
B 3.8-29

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.8.2.1 (continued)

source to transfer to. SR 3.8.1.9 and SR 3.8.1.10 are also not required to be met since the ability to respond to ES actuations in other than MODES 1, 2, 3 or 4 is not a requirement for CR-3.

This SR is modified by a Note. The NOTE indicates SRs 3.8.1.3, 3.8.1.3, and 3.8.1.11 are not required to be performed to comply with SR 3.8.2.1. The reason for the Note is to preclude situations in which the OPERABLE EDG would be paralleled with the offsite power network or rendered inoperable during performance of SRs. With limited AC sources available, a single event could compromise both the required offsite circuit and the EDG. It is the intent that these SRs must still be capable of being met, but actual performance is not required. Refer to the Bases for LCO 3.8.1 for a discussion of each SR.

Additionally, the impact of entering the ACTIONS of this Specification during Surveillance testing was evaluated as part of ITS implementation and a unique situation was discovered relative to the monthly EDG testing performed as part of surveillance procedures SP-354A and SP-354B and the MODES and Conditions addressed by this Specification. The EDG tear down and inspection is periodically performed during MODES 5 and 6 outages. Thus, it was concluded CR-3 could coincidentally have only one OPERABLE EDG and be required to perform SP-354. This created a concern since certain portions of SP-354 render the EDG inoperable, requiring entry into the ACTIONS of this Specification. Required Action B.3 requires action be initiated immediately to restore the EDG to OPERABLE status. Thus, a situation is established in which SP-354 is performed, the ACTIONS are entered, SP-354 is immediately terminated (in order to restore OPERABILITY of the EDG). In this case, SP-354 could never be performed.

The need to perform SP-354 was evaluated in light of this concern. It was decided that since the periods of inoperability for the performance of the portions of SP-354 associated with SR 3.8.1.2 and 3.8.1.6 were brief and the SRs provided confidence in the OPERABILITY of the EDG, the SP should be performed. Expediently performing the portions of SP-354 associated with SR 3.8.1.2 and 3.8.1.6 during these MODES satisfies the intent of Required Action B.3 and is therefore acceptable. For MODE 5 and 6 surveillance testing performed in accordance with SP-354 to meet SR 3.8.1.3 will be performed at the frequency of SR 3.8.1.3 only when both EDG trains are operable.

REFERENCES

None.
