

Florida Power CORPORATION **Grystal River Unit 3** cket No. 50-302

August 26, 1997 3F0897-36

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

Additional Clarification of FPC Letter 3F0797-25 Regarding 18 to Subject: 24-Month Fuel Cycle Surveillance Extensions - Amendment No. 152

References: A. FPC to NRC Letter, 3F0797-25, dated July 21, 1997

Dear Sir:

A telephone call between Florida Power Corporation (FPC) and the Nuclear Regulatory Commission (NRC) was held on August 4, 1997 to discuss SER Clarification numbers 2 and 3 in Attachment 2 of Reference A. It was agreed that alternative wording was appropriate for these Clarifications. The following two Clarifications are direct replacements for those contained in Reference A.

2) Clarification:

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The Instrument Drift Program is an ongoing program which will monitor future surveillance procedure as-found and as-left data, and will incorporate new data into the drift study spread sheets with the existing drift data. The revised drift data mean, standard deviation, 95%/95% tolerance intervals, etc., will be compared with the existing drift data to ensure the conclusions in the drift study remain bounding.



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## 3) Clarification:

Drift data will be taken once every 2 years during refueling outages. If an instrument is found outside of the as found tolerance, it will be entered into the Crystal River Unit 3 Corrective Action program (PC Card) and the operability requirements of the Technical Specifications will apply. Input, evaluation, and trending of instrument data and the impact of the increased surveillance interval will be completed within 180 days after restart and any potential revisions to calibration intervals or setpoints will be made during this period. This period for completing the drift evaluations is well within the 18 month operating experience data for instrumentation drift.

We appreciate your assistance in achieving NRC acceptance of these clarifications.

If you have any questions regarding this letter, please contact D. F. Kunsemiller, Manager, Nuclear Licensing at (352) 563-4566.

Sincerely,

R. E. Grazio Director, Regulatory Affairs

DFK/jnb

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