

# Florida Power

CORPORATION  
Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72

August 13, 1999  
3F0899-04

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

Subject: Supplemental Licensee Event Report (LER) 50-302/97-038-01 and Change To A Commitment Made In Reply To Notice Of Violation 50-302/97-16-03

References: (1) FPC to NRC letter 3F1197-12, Licensee Event Report (LER) 50-302/97-038-00, dated November 22, 1997.

(2) FPC to NRC letter 3F1297-20, Reply to Notice of Violations, NRC Inspection Report No. 50-302/97-16, dated December 17, 1997.

Dear Sir:

The purpose of this letter is to provide notification that a commitment common to References 1 and 2 is being revised and that the revised commitment has been implemented. This letter also provides a Supplement to Licensee Event Report (LER) 50-302/97-038-00. In Reference 1, Florida Power Corporation (FPC), in part, made the following commitment:

"The liquid outlet piping for the Miscellaneous Waste Storage Tank, Spent Resin Storage Tank, and Neutralizer Tank will be upgraded to Seismic Class I prior to restart from the next scheduled refueling Outage (11R)."

In Reference 2, FPC made the following commitment:

"The liquid outlet piping for the Miscellaneous Waste Storage Tank and Spent Resin Storage Tank will be upgraded to Seismic Class I prior to restart from the next scheduled refueling outage (R11)."

These commitments addressed a condition identified as being outside the design basis of the plant. Design drawings and the installed Waste Disposal System (WDS) did not match the Final Safety Analysis Report (FSAR) seismic design basis description with respect to liquid outlet piping for the Miscellaneous Waste Storage Tank (WDT-4), Spent Resin Storage Tank (WDT-6), and Neutralizer Tank (WDT-9). FSAR Section 5.1.1.1 stated, in part, that those structures, components, and systems, whose failure might cause or result in an uncontrolled release of radioactivity, were designated Seismic Class I. FSAR Section 5.1.1.1.i further stated that the liquid outlet piping for 14 radioactive WDS tanks (to and including the second isolation valve downstream from each of the tanks and the process piping associated with the reactor coolant drain tank) was designated Seismic Class I.

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Based on further review of design documentation, FPC has concluded that the WDT-4, WDT-6, and WDT-9 liquid outlet piping satisfies the plant design basis. During plant construction, liquid waste disposal pumps were designed and procured in accordance with industry standards. Not all pumps were procured to be seismically qualified. Non-seismic pumps were installed between the first and second isolation valves downstream of WDT-4, WDT-6, and WDT-9. These systems, through the first isolation valve, meet Seismic Class I criteria for pressure boundary and provide adequate protection against uncontrolled release of radioactivity, as supported by FSAR Change Package 1999-0063. With the intervening non-seismic pumps, the piping systems through the second isolation valve were designed and installed to Seismic Class III requirements.

The above condition was recognized in 1977. The Seismic Class I boundary was moved to the first valve downstream of WDT-4, WDT-6, and WDT-9 under Modification Approval Record MAR 77-09-18. The MAR, which did not involve any hardware changes, updated FSAR Figures but did not update the FSAR Section 5.1.1.1.i seismic design basis description. The FSAR Section 5.1.1.1.i seismic design basis description formed the basis for Violation 50-302/97-16-03.

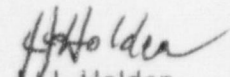
Based on the above information, the commitment to upgrade the WDT-4, WDT-6, and WDT-9 liquid outlet piping to Seismic Class I is changed to the following:

"FSAR Section 5.1.1.1.i has been revised to state that the liquid outlet piping to and including the first isolation valve downstream of WDT-4, WDT-6 and WDT-9 is Seismic Class I."

FSAR Change Package 1999-0063 has been reviewed and approved. The 10CFR50.59 Safety Assessment/Unreviewed Safety Question Determination (SA/USQD) concluded that the change to FSAR Section 5.1.1.1.i did not involve an unreviewed safety question.

Please find enclosed Supplemental LER 50-302/97-038-01 which is being submitted pursuant to 10CFR50.73(c). No new commitments are contained in this submittal. If you have any questions regarding this submittal, please contact Mr. Larry McDougal, Manager, Nuclear Regulatory Compliance, at (352) 563-4988.

Sincerely,



J. J. Holden

Vice President and Site Director

JJH/dwh  
Enclosure

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