Florida Power
CORPORATION

November 12, 1986
3F1186-14

Mr. John F. Stolz, Director
PWR Project Directorate #6
Division of PWR Licensing B
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
Containment Purge System Operational Restrictions

Dear Sir:

In response to a February 16, 1983 letter, Florida Power Corporation (FPC) stated on March 1, 1983 "FPC has closed the purge and vent valves. We will also verify every 31 days that the valves are closed when in Modes 1, 2, 3, or 4." This commitment has remained in effect since that time.

At the present time, Crystal River 3 (CR-3) is in Mode 3 (Hot Standby) and is shutting down to replace a failed control rod drive motor. Due to a small unidentified gaseous leak inside containment, the present whole body imersion dose rate is approximately 1385 mRem per hour combined beta/gamma. The purpose of this letter is to request NRC relief from FPC's March 1, 1983 commitment and allow containment purge system operation for up to 48 hours in Modes 3 and 4 on a one-time basis during this shutdown evolution.

This relief is justified because it will:

1. Reduce radiation dose to workers who must enter the containment for the repair efforts;

2. Reduce background radiation levels to facilitate location of the source of the radiation;

3. Reduce possibilities for human error by reducing the amount of cumbersome protective apparatus worn by workers; and

4. Expedite repair efforts by allowing containment entry sooner.

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The safety impact of this commitment deviation is minimal for the following reasons:

1. There will be no impact on the plant Technical Specifications.

2. The automatic containment purge isolation system will be operable in the unlikely event high radiation levels are experienced.

3. The plant will not be in power operation, and the reactor will not be critical during the time the purge system is in operation, thus reducing the probability of any equipment failures.

4. Recent fracture mechanics analysis has shown that a sudden catastrophic rupture of the primary coolant system is extremely unlikely. It is the sudden pressure increase resulting from such a postulated rupture which caused the NRC concerns about valve operability.

We request your expeditious review and response to this request so appropriate actions may be taken.

Sincerely,

E. C. Simpson

E. C. Simpson
Director, Nuclear Operations
Engineering and Licensing

AEF/feb

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