

April 26, 1998 3F0498-18

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

Subject: Crystal River Unit 3 Technical Support Center Construction Project

Dear Sir:

The purpose of this correspondence is provide the NRC with advanced notification of Florida Power Corporation's (FPC) plans related to a construction project to add three floors to the existing Technical Support Center/Operational Support Center (TSC/OSC). To support this construction project, FPC plans to temporarily relocate the boundary of the Crystal River Unit 3 (CR-3) Protected Area (PA) such that the TSC/OSC will be outside of the PA.

As described in Attachment B to this letter, temporary compensatory measures will be implemented to ensure there is no decrease in the effectiveness of the CR-3 Radiological Emergency Response Plan (RERP) during the construction period. The current project schedule calls for the TSC/OSC to be located outside the PA from May 1998 to February 1999. The areas of the RERP and implementing procedures most directly affected include activation of the facility and the dispatching of emergency teams into the plant.

Compensatory measures will be employed to ensure continued timely activation of the TSC/OSC and dispatch of emergency teams. The temporary compensatory measures described in Attachment B to this letter provide reasonable assurance that the effectiveness of the CR-3 Emergency Preparedness program will not be degraded and that the program will continue to meet both the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. In addition, these temporary provisions do not adversely impact either the CR-3 Physical Security Plan or the CR-3 Safeguards Contingency Plan. Reviews have determined that no decrease in Security effectiveness will be experienced as a result of this activity per 10 CFR 50.54(p).

A Florida Progress Company

9804300240 980426 PDR ADOCK 05000302 P PDR

ADD: NRR DRAM RSGB

Hr. Grel.

CRYSTAL RIVER ENERGY COMPLEX: 15760 W. Power Line Street · Crystal River, Florida 34428-6708 · (352) 795-6486

U.S. Nuclear Regulatory Commission 3F0498-18 Page 2 of 2

This letter is provided for your information. New regulatory commitments described in this letter are reflected in Attachment A. Questions regarding Emergency Preparedness issues related to this matter may be referred to Mr. J.D. Stephenson at (352) 563-4522. Questions regarding Security issues may be referred to Mr. F. E. Marcussen at (352) 563-4911.

Sincerely,

11Holder

J.J. Holden, Director Site Nuclear Operations

JJH/twc Attachments

cc: Regional Administrator, Region II Senior Resident Inspector NRR Project Manager Ken Barr, Region 1 Lorrie Stratton, Region II U.S. Nuclear Regulatory Commission 3F0498-18

ATTACHMENT A

LIST OF COMMITMENTS

The following table identifies those actions committed to by Florida Power Corporation in this document. Any other actions discussed in the submittal represent intended or planned actions by Florida Power Corporation. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager, Nuclear Licensing of any questions regarding this document or any associated regulatory commitments.

Commitment	Due Date
A Nuclear Security Officer will be posted at the temporary Protected Area gate 24 hours per day and specific posting instructions will be provided to ensure expeditious staffing of the TSC/OSC such that the facility will be operational within the required 60 minutes. The security officer posting will be in accordance with Security Procedure SS-208, "Compensatory Measures."	Prior to removal of existing security fence (estimated May 19, 1998)
Prior to entry into the PA, emergency response team members will receive a physical "hands on" search. In addition, equipment carried by emergency response team members will be searched (electronic searches will not be necessary). These searches will be accomplished per posting instructions in accordance with Security Procedure SS-208, "Compensatory Measures."	Prior to removal of existing security fence (estimated May 19, 1998)
Periodic drills will be run by Security and Radiological Emergency Planning to specifically test the expeditious processing of personnel through the temporary gate.	May 19, 1998
Construction plans will ensure the radwaste liner will be kept in an area that can be reached by the decontamination shower pump hose line. General access to this area will also be maintained throughout the construction process.	May 19, 1998
Construction plans will ensure an access path will be maintained at the east end of the TSC/OSC roof for maintenance personnel to perform required activities on the roof of the TSC/OSC as necessary to place the TSC/OSC in the emergency ventilation mode.	May 19, 1998

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

ATTACHMENT B

(FPC LETTER NUMBER 3F0498-18)

COMPENSATORY MEASURES FOR RADIOLOGICAL EMERGENCY RESPONSE PLAN DURING TEMPORARY CONSTRUCTION PROJECT

U.S. Nuclear Regulatory Commission 3F0498-18

Attachment B Page 1 of 3

CRYSTAL RIVER UNIT 3 DOCKET NO. 50-302/LICENSE NO. DPR-72 COMPENSATORY MEASURES FOR RADIOLOGICAL EMERGENCY RESPONSE PLAN DURING TEMPORARY CONSTRUCTION PROJECT

Background

.

A construction project is planned for 1998 to add three floors to the existing Technical Support Center/Operational Support Center (TSC/OSC) building which is currently located inside of the Protected Area (PA). These floors are for plant administration and will be independent of the function or operation of the TSC/OSC. Except for some minor exceptions, the construction will not directly affect the ground floor which functions as the TSC/OSC. To support this construction project, FPC plans to temporarily relocate the boundary of the PA such that the TSC/OSC will be outside the PA. Due to the scope of this project, completion of the work outside of the PA will eliminate several logistical problems associated with Security requirements thereby not compromising those security requirements, and will allow the work to be completed more expeditiously. The current project schedule calls for the TSC/OSC to be located outside the Protected Area from May 1998 to February 1999.

Effects on the Radiological Emergency Response Plan (RERP) and Planned Compensatory Measures

This project most directly impacts the RERP and implementing procedures in two areas including activation of the facility and the dispatching of emergency teams into the plant. Although not directly impacted, the installation of the decontamination shower pump during an event and the placement of the TSC into the emergency recirculation ventilation mode are discussed in this informational submittal to the extent that construction plans will need to accommodate these activities. The discussion below refers to the appropriate sections of the RERP and implementing procedures.

I. Facility Activation

Procedure References:

EM-202, "Duties of the Emergency Coordinator" EM-102, "Operation of the Technical Support Center," Section 1.2.4 RERP Table 6.1

The TSC is required to be operational 60 minutes from the declaration of an Ale emergency classification or higher. Facility activation would only be hindered if activation of the TSC/OSC coincides with a site evacuation during day shift (waiting for high population on site to evacuate the PA).

Attachment B Page 2 of 3

Compensatory Measure:

Nuclear Security will open the access gate directly from the PA to the TSC/OSC and allow the TSC/OSC staff to exit directly to the TSC/OSC. This will ensure expeditious staffing of the facility. The gate described is the east 3' wide man gate depicted on the attached figure. A Nuclear Security Officer will be posted at this gate 24 hours per day and specific posting instructions will be provided to implement this plan in accordance with Security Procedure SS-208, "Compensatory Measures."

II. Emergency Team Dispatch

Procedure References:

EM-104, "Operation of the Operational Support Center"

With the TSC/OSC outside of the PA, any emergency response teams entering the PA must be searched unless the nature of the event (radioactive release, etc.) results in a suspension of safeguards. If safeguards are suspended, re-entry teams would have normal access to the plant. The compensatory measure to allow entry through the temporary gate described above, would result in a minimal delay for re-entry teams; however, this will not affect the timely activation and dispatch of teams.

Compensatory Measure:

Prior to entry into the PA, emergency response team members will receive a physical "hands on" search. In addition, equipment carried by emergency response team members will also be searched (electronic searches will not be necessary). The nature of the search procedure should not significantly delay team entry into the PA. The extent of the equipment carried in by teams would be basic tools, radiological instrumentation, and respiratory protection devices. The nature of this equipment would not require detailed time-consuming searches. A Nuclear Security Officer would be posted at this gate at all times, so response by Security to open the gate is not an issue. Other equipment that may be needed by the teams will continue to be located within the PA.

Posting instructions will be provided to Nuclear Security Officers in accordance with SS-208 to accomplish the search of re-entry teams as described above. Periodic drills will also be run by Security and Radiological Emergency Planning to specifically test the expeditious processing of personnel through the temporary gate. A team of two to four people should not be delayed more than thirty seconds per person.

III. Installation of the Decontamination Shower Pump

Procedure References:

EM-104, "Operation of the Operational Support Center," Section 4.2.1.6 and Enclosure 7.

The installation of a temporary pump is required when the TSC/OSC decontamination shower is used. The pump hooks to the shower drain line and pumps waste water into the radwaste liner that is located outside the west end of the TSC.

Compensatory Measure:

The construction plans will call for the radwaste liner to be kept in an area that can be reached by the decontamination shower pump hose line. General access to this area will also be maintained throughout the construction process.

IV. Placement of the TSC/OSC in the Emergency Recirculation Ventilation Mode.

Procedure References:

EM-104, "Operation of the Operational Support Center," Enc. 6.

Placing the TSC/OSC in the emergency recirculation mode requires maintenance personnel to access the east end of the TSC/OSC roof to close and seal two "goose neck" ventilation ducts.

Compensatory Measure:

The construction plans call for an access path to be maintained at the east end of the TSC/OSC for maintenance personnel to perform required activities on the roof of the TSC/OSC as necessary to place the TSC/OSC in the emergency ventilation mode. The final plans also call for access stairs to be permanently installed for this purpose. These compensatory measures would be necessary whether or not the PA boundary was relocated, to facilitate construction.

Miscellaneous Issues

This project will not effect TSC/OSC habitability. The HVAC system and the loading of the TSC/OSC diesel generator will remain independent of the additional floors. All required TSC/OSC operational requirements will be maintained throughout the construction project including all Surveillance and Preventive Maintenance Procedures associated with TSC equipment (HVAC, Diesel, Data Displays, etc.).

Conclusion

Based on the planned compensatory measures, FPC believes that emergency response will not be degraded as a result of the temporary modification.

U.S. Nuclear Regulatory Commission 3F0498-18

.



Figure 1