

**Florida  
Power**  
CORPORATION

August 14, 1989  
3F0889-10

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Subject: Crystal River Unit 3  
Docket No. 50-302  
Operating License No. DPR-72  
Revised Generic Letter 88-11 Response

Dear Sir:

The purpose of this letter is to revise Florida Power Corporation's (FPC) response to Generic Letter 88-11 "NRC Position on Radiation Embrittlement of Reactor Vessel Materials and its Impact on Plant Operations." The Generic Letter requested utilities to submit the results of their technical analyses regarding pressure-temperature limits and a proposed schedule for whatever actions they proposed to take. In the response to the Letter, FPC committed to submit updated pressure-temperature curves for CR-3, utilizing the methodology of Regulatory Guide 1.99 Revision 2. The proposed FPC schedule for submittal was given as September 1989. Based on the reasons discussed below, FPC is revising the scheduled submittal date to no later than October 31, 1989.

In the initial response to the NRC Staff, FPC planned to submit updated pressure-temperature curves for CR-3 based on 10CFR50 Appendix G and Regulatory Guide 1.99 Revision 2. FPC did not anticipate the development of a non-Appendix G Low Temperature Overpressure Protection (LTOP) approach within the time frame of the initial submittal. However, during the Technical Specification Improvement Program (TSIP) effort, FPC identified the need to re-establish/confirm CR-3's technical basis for LTOP.

Subsequent to FPC's initial submittal, the Babcock and Wilcox Owner's Group (B&WOG) proposed the development of a non-Appendix G LTOP approach, based on the low probability of occurrence for this type of event. This approach was consistent with the NRC position in Generic Letter 88-11 and TSIP was viewed as an effective vehicle for accomplishing this. A meeting with FPC, B&W, and the NRC on May 16, 1989 resulted in preliminary NRC concurrence with the B&WOG LTOP approach. FPC had anticipated completing the LTOP effort in time to support the September 1, 1989 TSIP submittal to the NRC, but it is now apparent that this will not occur.

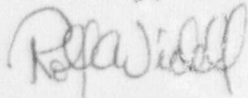
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Together, the pressure-temperature curves and the LTOP curve will comprise the CR-3 system for providing reactor coolant pressure boundary (RCPB) protection against non-ductile failures. The two curves provide overlapping protection of the RCPB during operation at lower temperatures. A complete review of the pressure-temperature curves must include consideration of the LTOP curve as well. For this reason, FPC plans to submit both curves together.

As noted in FPC's initial Generic Letter 88-11 response, the most recent surveillance capsule results indicate that current 8 EFY pressure-temperature limits (conservative until June 1990) will adequately protect the reactor coolant pressure boundary until the enhanced, combined submittal is made.

Sincerely,



R. C. Widell  
Director, Nuclear Operations Site Support

RCW/BPW

xc: Regional Administrator, Region II  
Senior Resident Inspector