

July 7, 1989

Docket No. 50-302

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Mr. W. S. Wilgus
Vice President, Nuclear Operations
Florida Power Corporation
ATTN: Manager, Nuclear Operations
Licensing
P. O. Box 219-NA-2I
Crystal River, Florida 32629

Dear Mr. Wilgus:

SUBJECT: CRYSTAL RIVER UNIT 3 - RESPONSE TO GENERIC LETTER 88-17 ON LOSS OF
DECAY HEAT REMOVAL WITH RESPECT TO EXPEDITIOUS ACTIONS (TAC NO. 69738)

On January 4, 1989, Florida Power Corporation submitted a response to Generic Letter 88-17 for expeditious actions to be taken in the event of a loss of decay heat removal. This response included an attachment that explained your programmed enhancements.

The staff has reviewed your response and finds that it meets the intent of Generic Letter 88-17 with respect to expeditious actions. Your response was brief, however, and therefore did not cover all areas in detail.

The staff intends to conduct an audit of both your response to expeditious actions and your programmed enhancement program. The areas where we do not fully understand your responses, as indicated in the enclosed comments, may be covered in the audit of the expeditious actions.

Sincerely,

Original signed by
George Wunder FOR

Harley Silver, Project Manager
Project Directorate II-2
Division of Reactor Projects-I/II
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
See next page

[RESPONSE TO GL 88-17/CR-3]

LA: PM II-2
D Miller
07/10/89

PE: PD II-2
GWunder/jd
07/07/89

PM: PD II-2
HSilver
07/07/89

D: PD II-2
H Berkow
07/17/89

DFol
1/1

Mr. W. S. Wilgus
Florida Power Corporation

Crystal River Unit No. 3 Nuclear
Generating Plant

cc:

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Attorney General
Department of Legal Affairs
The Capitol
Tallahassee, Florida 32304

Enclosure

NRC STAFF OBSERVATIONS ON
FLORIDA POWER CORPORATION'S RESPONSE
TO GENERIC LETTER 88-17
CRYSTAL RIVER UNIT 3

The NRC staff has reviewed your January 4, 1989 response to Generic Letter 88-17. We find that your response meets the intent of the Generic Letter with respect to expeditious actions. However, your response to some of the items is brief and therefore does not provide the detail to allow us to fully understand some of your actions taken in response to GL 88-17. We have provided the following comments as guidance to assure that your actions are adequate.

1. You indicate that administrative procedures are in place to address containment closure requirements and that you are participating in a B&W Owners Group effort to perform analyses pertinent to lowered loop operation. You have not presented any times for closure in the meantime. Generic Letter 88-17 states that "containment penetrations including the equipment hatch, may remain open provided closure is reasonably certain within 2.5 hours of initial loss of DHR."
2. Your response with respect to containment closure is cursory and no information is provided regarding how you will keep track of and control the many potential openings which may have to be closed simultaneously. We assume your procedures and administrative controls will address this topic.
3. You mention that a minimum of two incore thermocouples will be monitored in the control room whenever the core is in mid-loop condition and the reactor vessel head is on the reactor vessel. It was not specifically stated whether the temperature indications would be periodically checked and recorded or automatically and continuously monitored and alarmed as recommended in Generic Letter 88-17.
4. You indicate that you have partially completed installation of a means of RCS level indication which will have indication in the control room and has capability now for limited situations (reactor vessel head off). You also stated that an evaluation is underway for a second means for RCS level indication. When two instruments are in place, care should be taken to resolve any discrepancy between the two measurement systems. Also, the pressure of the reference leg should approximate the pressure of the void in the hot leg or be compensated to obtain the correct level value. You have not stated what type the level measurement systems are, or if they will have alarms. If they will not have alarms the indications will need to be periodically checked and recorded by operators. You also indicate that only one method of level measurement is currently available. This is acceptable in the short term; however, for the longer term, at least two independent level indications must be provided in the control room.

5. You have not identified the use of any vent opening on the hot side of the RCS to relieve RCS pressure.

There is no need to respond to the above observations.

As you are aware, the expeditious actions you have briefly described are an interim measure to achieve an immediate reduction in risk associated with reduced inventory operation, and these will be supplemented and in some cases replaced by programmed enhancements. Please be reminded that we intend to audit both your response to the expeditious actions and your programmed enhancement program.