

**Florida
Power**
CORPORATION

May 8, 1989
3F0589-02

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

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Control of Heavy Loads - Phase I (NUREG-0612)

Dear Sir:

By letter dated June 11, 1984, from Florida Power Corporation (FPC) to the Nuclear Regulatory Commission (NRC), subject as above, FPC proposed the following in-service test relative to the Reactor Vessel Head and internals Special Lifting Device (tripod):

"A 10 minute hold immediately after the head has been lifted to a height of less than one foot with documented visual exam of the tripods' performance on each head lift."

FPC is revising the above in-service test to read as follows:

"During each outage in which the reactor vessel head is removed, FPC will perform a 10 minute hold at less than one foot off the reactor vessel during the initial head lift. Periodic NDE inspections will also be completed every third refueling.

The justification for this change is supported by the following information. The 10 minute hold time on the reactor vessel head and internals rigging has been utilized since implementation every time the reactor vessel head or internals were lifted. This included both the lifts off the vessel and the head storage stand. The intent of this action was to perform a 100% in-place load test of the rigging once per refueling outage or any other outage in which the reactor vessel head was to be removed. The 10 minute hold during the initial head lift off the reactor vessel combined with the periodic NDE

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Nuclear Regulatory Commission

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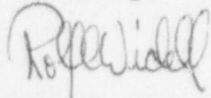
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inspections (every third refueling) is sufficient to ensure that the intent of NUREG-0612 is satisfied. The additional 10 minute hold presently performed when the head is lifted off the storage stand to be placed on the vessel is therefore redundant.

Additionally, the extra hold time presents both an ALARA and personnel safety concern. The ALARA concern is simply the additional time personnel are required to remain near the reactor vessel head. The personnel safety issue is a general crane/rigging practice to minimize the time any large item is suspended.

Should you have any questions concerning the revised in-service test please contact my staff.

Sincerely,



Rolf C. Widell, Director
Nuclear Operations Site Support

RCW:hbk

cc: Regional Administrator, Region II
Sr. Resident Inspector