

**Florida  
Power**  
CORPORATION

August 25, 1989  
3F0889-14

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  
Technical Specification Change Request No. 171  
Technical Specification Improvement

- REFERENCES:
1. 52FR3788, NRC Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors, February 6, 1987.
  2. NRC letter from T.E. Murley (NRC) to W.S. Wilgus (FPC), NRC Staff Review of Nuclear Steam Supply System Vendor Owners Groups' Application of the Commission's Interim Policy Statement Criteria to Standard Technical Specifications, May 9, 1988.

Dear Sir:

Florida Power Corporation (FPC) hereby submits Technical Specification Change Request No. 171 requesting amendment to Appendix A of Operating License No. DPR-72. As part of this request, the proposed replacement pages for Appendix A are provided.

This submittal proposes to revise the Crystal River Unit 3 Technical Specifications using the guidance provided in References 1 and 2. Additionally, guidance developed in the continuing dialogue between the NRC and NUMARC (to which FPC has been a principle contributor) has been utilized. FPC's Crystal River Unit 3 is the lead plant for Technical Specification Improvement for the Babcock and Wilcox Owners Group.

The Limiting Conditions for Operations (LCOs), Actions and Surveillance Requirements have been rewritten to be clear and concise. For certain specifications, FPC is proposing to add requirements in order to achieve consistency with other specifications, safety analyses, and plant hardware. FPC utilized the results of evaluations that have been reviewed and approved by

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the NRC in the development of these specifications. FPC also proposes technical changes that would relax requirements that are unduly restrictive and eliminate requirements that are unnecessary or inappropriate.

The current Technical Specifications which do not meet the Selection Criteria in Reference 1 will be relocated. The principle control process for the relocated specifications is an improved implementation of 10 CFR 50.59. FPC expects to modify the appropriate administrative controls to address the improvements outlined in NSAC-125 (Guidelines for 10 CFR 50.59 Safety Evaluations, June 1989) by mid-1990.

Technical Specification Bases have been upgraded in accordance with NRC guidance. Each LOO, Required Action and Surveillance Requirement is addressed in the Bases. Additionally, each Bases has Background and Safety Analysis sections that provide general information about the system, component, or parameter addressed by the LOO, the relationship between the LOO requirements and the appropriate safety analyses, and the explanation of which criterion requires it to be in the Technical Specifications.

The Bases were not developed principally from the Crystal River Unit 3 Final Safety Analysis Report. Instead, FPC chose, as a direct parallel to the ongoing Configuration Management Program, to utilize calculations, analyses, procedures and other key developmental references to ascertain appropriate Bases for the improved Technical Specifications. As a result, this effort identified some inconsistencies between existing Technical Specification requirements and analyses. These inconsistencies will be reported to the NRC under separate correspondence.

The contents of this submittal are as follows:

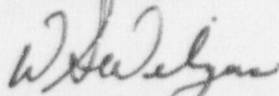
1. A plant-specific split document. This document describes the application of the Selection Criteria from Reference 1 to the Crystal River Unit 3 Technical Specification. This document also summarizes the new location of existing Technical Specifications (either relocated to the Final Safety Analysis Report or retained in improved Technical Specifications). For retained Technical Specifications, a cross reference between the existing numbering and the revised numbering is provided.
2. A change request package for each individual chapter. The change request package reflects utilizing the existing license as a starting point for justifying revisions to the Technical Specifications. The Standard Technical Specifications were not utilized since a change request must address the change to the license, not the departure from a generic document with no legal standing for the Crystal River Unit 3 license. The package includes:
  - (a) Revised LOOs, Actions and Surveillance Requirements.
  - (b) Upgraded Bases.



- (c) A markup of the existing Crystal River Unit 3 Technical Specifications showing changes (including cross-reference identifiers to technical changes).
  - (d) A detailed description of changes (including cross-reference identifiers to technical changes).
  - (e) An evaluation of technical changes. Each technical change has been assigned a unique cross-reference identifier (e.g., Rx. 8, ECCS. 15, PS. 7, etc.) to help facilitate review.
  - (f) A proposed significant hazards consideration evaluation for each technical change (including cross-reference identifiers to technical changes).
3. A markup of BAW-2076 (Babcock and Wilcox Owners Group Revised Standard Technical Specifications (RSTIS) showing necessary plant specific changes to the generic RSTIS. This markup also provides discussions of the changes (including cross-reference identifiers to technical changes).
  4. A copy of submitted FPC Technical Specification Change Requests relied upon for the development of this document and referenced in the evaluation of technical changes.
  5. A summary and drafts of FSAR changes identified during the Technical Specification Improvement development process. These changes are necessary to achieve consistency between the FSAR and analyses.

This submittal has been reviewed as a proposed change to Technical Specifications by the Plant Review Committee and the Nuclear General Review Committee in accordance with existing Technical Specifications sections 6.5.1.6.c and 6.5.2.8.c. FPC is confident that this submittal and the efforts utilized in developing it meet or exceed NRC needs and expectations at this stage of the industry Technical Specification improvement process. As a result, this submittal is provided for NRC review and acceptance.

Sincerely,



W.S. Wilgus, Vice President  
Nuclear Operations

WSW/DGG/wla

Attachment

xc: Regional Administrator, Region II  
Senior Resident Inspector

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER )  
 )  
FLORIDA POWER CORPORATION ) DOCKET NO. 50-302

CERTIFICATE OF SERVICE

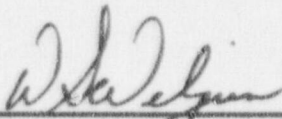
W.S. Wilgus deposes and says that the following has been served on the Designated State Representative and Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,  
Board of County Commissioners  
of Citrus County  
Citrus County Courthouse  
Inverness, FL 32650

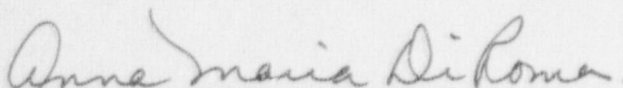
Administrator  
Radiological Health Services  
Department of Health and  
Rehabilitative Services  
1323 Winewood Blvd.  
Tallahassee, FL 32301

A copy of Technical Specification Change Request No. 171 , requesting Amendment to Appendix A of Operating Licensing No. DPR-72.

FLORIDA POWER CORPORATION

  
\_\_\_\_\_  
W.S. Wilgus, Vice President  
Nuclear Operation

SWORN TO AND SUBSCRIBED BEFORE ME THIS 25th DAY OF AUGUST 1989.

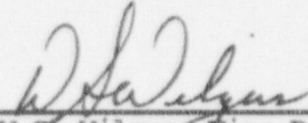
  
\_\_\_\_\_  
Notary Public

Notary Public, State of Florida at Large  
My Commission Expires:

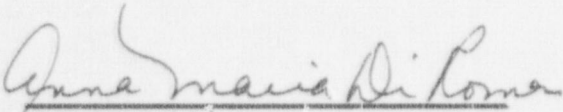
NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES OCT. 18, 1992  
BONDED THROUGH ASHTON AGENCY INC

STATE OF FLORIDA  
COUNTY OF CITRUS

W.S. Wilgus states that he is the Vice President, Nuclear Operations for Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
W.S. Wilgus, Vice President  
Nuclear Production

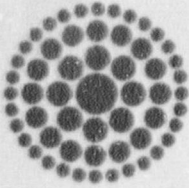
Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 25th day of August, 1989.

  
\_\_\_\_\_  
Notary Public

Notary Public, State of Florida at Large  
My Commission Expires:

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES OCT. 18, 1992  
BONDED THROUGH ASHTON AGENCY INC.





**Florida  
Power**  
CORPORATION

August 25, 1989  
3F0889-14

U.S. Nuclear Regulatory Commission  
ATTN: Instrument Control Desk  
Washington, D.C. 20555

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Dear Sir:

Florida Power Corporation (FPC) hereby submits Technical Specification Change Request No. 171 requesting amendment to Appendix A of Operating License No. DPR-72. As part of this request, the proposed replacement pages for Appendix A are provided.

This submittal proposes to revise the Crystal River Unit 3 Technical Specifications using the guidance provided in References 1 and 2. Additionally, guidance developed in the continuing dialogue between the NRC and NUMARC (to which FPC has been a principle contributor) has been utilized. FPC's Crystal River Unit 3 is the lead plant for Technical Specification Improvement for the Babcock and Wilcox Owners Group.

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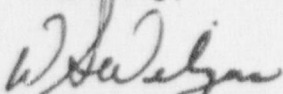
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Sincerely,



W.S. Wilgus, Vice President  
Nuclear Operations

WSW/DGG/wla

Attachment

xc: Regional Administrator, Region II  
Senior Resident Inspector



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER )

FLORIDA POWER CORPORATION )

DOCKET NO. 50-362

CERTIFICATE OF SERVICE

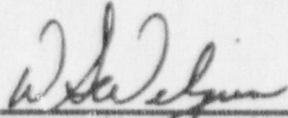
W.S. Wilgus deposes and says that the following has been served on the Designated State Representative and Chief Executive of Citrus County, Florida, by deposit in the United States mail, addressed as follows:

Chairman,  
Board of County Commissioners  
of Citrus County  
Citrus County Courthouse  
Inverness, FL 32650

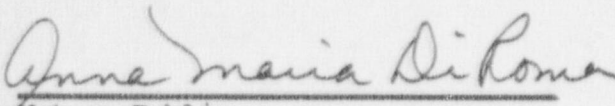
Administrator  
Radiological Health Services  
Department of Health and  
Rehabilitative Services  
1323 Winewood Blvd.  
Tallahassee, FL 32301

A copy of Technical Specification Change Request No. 171 , requesting Amendment to Appendix A of Operating Licensing No. DPR-72.

FLORIDA POWER CORPORATION

  
\_\_\_\_\_  
W.S. Wilgus, Vice President  
Nuclear Operation

SWORN TO AND SUBSCRIBED BEFORE ME THIS 25th DAY OF AUGUST 1989.

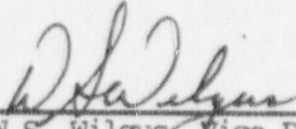
  
\_\_\_\_\_  
Notary Public

Notary Public, State of Florida at Large  
My Commission Expires:

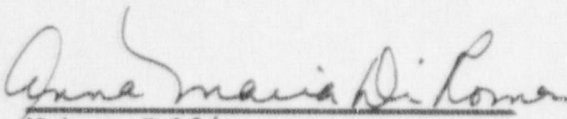
NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES OCT 18, 1992  
BONDED THROUGH ASHTON AGENCY INC

STATE OF FLORIDA  
COUNTY OF CITRUS

W.S. Wilgus states that he is the Vice President, Nuclear Operations for Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
W.S. Wilgus, Vice President  
Nuclear Production

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 25th day of August, 1989.

  
\_\_\_\_\_  
Notary Public

Notary Public, State of Florida at Large  
My Commission Expires:

NOTARY PUBLIC STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES OCT. 19, 1992  
FUNDING THROUGH AMTORG AGENCY INC