Florida Power
CORPORATION

July 26, 1989
3F0789-22

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. 172
Inadequate Core Cooling Technical Specification

Dear Sir:

Florida Power Corporation (FPC) hereby submits Technical Specification Change Request No. (TSCRN) 172, requesting amendment to Appendix A of Operating License No. DPR-72. Proposed replacement pages for Appendix A are provided. This submittal proposes to add requirements for core exit thermocouples and reactor vessel level instrumentation to the Technical Specifications.

FPC requests this amendment become effective 30 days after issuance in order to allow for procedure changes and training.

Sincerely,

Gary Boldt

Gary Boldt, Vice President
Nuclear Production

GLB:wla

Attachment

xc: Regional Administrator, Region II
Senior Resident Inspector

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

CERTIFICATE OF SERVICE

Gary Boldt 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. 172, requesting Amendment to Appendix A of Operating Licensing No. DPR-72.

FLORIDA POWER CORPORATION

Gary Boldt

Gary Boldt, Vice President
Nuclear Production

SWORN TO AND SUBSCRIBED BEFORE ME THIS 26th DAY OF JULY 1989.

Marjorie L. Guffond
Notary Public

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

NOTARY PUBLIC, STATE OF FLORIDA.
MY COMMISSION EXPIRES: DEC. 3, 1990.
BONDED THRU NOTARY PUBLIC UNDERWRITERS.

STATE OF FLORIDA
COUNTY OF CITRUS

Gary Boldt states that he is the Vice President, Nuclear Production 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.

Gary Boldt

Gary Boldt, Vice President
Nuclear Production

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 26th day of July, 1989.

Margorie L. Gufford

Notary Public

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

NOTARY PUBLIC, STATE OF FLORIDA.
MY COMMISSION EXPIRES: DEC. 3, 1990.
BONDED THRU NOTARY PUBLIC UNDERWRITERS

FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302 / LICENSE NO. DPR-72
REQUEST NO. 172, REVISION 0
NUREG-0737 ITEM II.F.2
INADEQUATE CORE COOLING TECHNICAL SPECIFICATIONS

LICENSE DOCUMENT INVOLVED: Technical Specifications

PORTIONS: 3.3.3.6, Table 3.3-10 and Table 4.3-7

DESCRIPTION OF REQUEST:

This submittal adds operability requirements, actions and surveillance requirements for core exit thermocouples and reactor coolant inventory tracking system to the post-accident monitoring instrumentation technical specification.

REASON FOR REQUEST:

The NRC, by letter dated June 20, 1989, requested FPC to submit Technical Specifications implementing NUREG-0737 II.F.2. The BAWOG is continuing to pursue justification for not having such Technical Specifications. FPC agreed to submit technical specifications until this issue is finally resolved with the BAWOG as part of TSIP and/or ATOG activities.

EVALUATION OF REQUEST:

The addition to technical specifications of the RCITS (or reactor vessel level) instrumentation and the core-exit thermocouples is being done to assure these instruments are available if needed. The instrumentation may assist the operator in avoidance of a degraded or melted core when voids in the reactor coolant system and saturation conditions result from overcooling, steam generator tube rupture or small break loss of coolant events. At Crystal River Unit 3, the primary ICC instruments to be utilized for such events are the subcooling margin monitor (currently in technical specifications) and the core-exit thermocouples. However, these instruments at CR-3 either lack redundancy or are not qualified to Regulatory Guide 1.97 Category 1 requirements. Therefore, the reactor vessel level instrumentation (which is qualified to Regulatory Guide 1.97 Category 1 requirements) has been provided in CR-3 Technical Specifications to assure its availability. The reactor vessel level instrumentation, coupled with core-exit thermocouples and the subcooling margin monitor provide the ICC instrumentation package installed at CR-3. As a result, this change represents an additional restriction on plant operations to ensure these instruments will be available.

SHOLLY EVALUATION OF REQUEST:

Florida Power Corporation (FPC) proposes that this change does not involve a significant hazards consideration. The change which adds reactor vessel level instrumentation and core-exit thermocouples to the Technical Specifications has no negative impact on plant operation or safety. This change will help ensure the availability of these instruments which may aid the operators diagnosing the approach to ICC and assessing the adequacy of responses to restore core cooling. As such, the change represents an additional restriction on plant operations.

Based on the above, FPC finds that the change will not:

1. Involve a significant increase in the probability or consequence of an accident previously evaluated because the additional requirements for ICC instruments ensures their OPERABILITY during and following postulated accidents. Therefore, this change has no negative effect on the probability or consequences of a previously evaluated accident.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change introduces no new mode of plant operation nor does it require physical modification to the plant.

3. Involve a significant reduction in the margin of safety. No reduction in the margin of safety is involved as the change represents an additional restriction on plant operations to assure instruments will be available.