

**Florida
Power**
CORPORATION

March 23, 1990
3F0390-21

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
Request for Temporary Waiver of Compliance

The NRC requested by letter dated June 11, 1980, D. G. Eisenhut to All Operating Pressurized Water Reactors, that licensees submit Technical Specifications to provide for redundancy in reactor decay heat removal capability in all modes. A model B&W STS Specification was included in the letter for use by the licensee. Florida Power Corporation (FPC) submitted Technical Specification Change Request No. (TSCRN) 65 on February 16, 1984, which was intended to be consistent with the model B&W STS Specification 3.9.8.2. However, FPC inadvertently omitted the "*" and footnote which would have allowed for the normal or emergency power source to be inoperable for each decay heat removal loop. The NRC issued Amendment 117 on May 31, 1989 consistent with FPC's TSCRN 65.

The new Specification, 3.9.8.2 (Amendment 117), is only applicable in Mode 6, and as such, will be utilized for the first time during Crystal River Unit 3's (CR-3) current refueling outage. During planning activities for entry into Mode 6, it was discovered that the specification cannot be met since maintenance activities on a diesel generator are planned to occur simultaneously with the refueling water level less than 23 feet above the top of the fuel. Based on the omission of the above mentioned power source footnote, CR-3 Specification 3.9.8.2 is unnecessarily restrictive in that it currently requires two independent power sources to be operable for each decay heat loop. The model B&W STS Specification 3.9.8.2, provided by the NRC in the June 11, 1980 letter, states "the normal or emergency power source may be inoperable for each DHR loop." Therefore, FPC respectfully requests that a temporary waiver of compliance be granted on Specification 3.9.8.2. This waiver will allow for the use of the model B&W STS footnote wording regarding

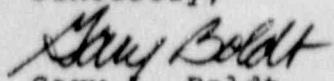
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NRR Trammell, C. 1/1

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power sources in order to support entry into Mode 6 during the current refueling outage since one diesel generator will be out of service. Enclosure 1 provides the justification for this requested temporary waiver of compliance. Enclosure 2 provides a marked-up copy of the existing CR-3 Technical Specification 3.9.8.2 to illustrate the necessary change. FPC will expedite a request to incorporate the subject footnote as a permanent change to the CR-3 Technical Specifications.

Sincerely,



Gary L. Boldt
Vice President, Nuclear Production

Enclosures

xc: G.C. Lainas, Assistant Director for Region II Reactors
Regional Administrator, Region II
Senior Resident Inspector

ENCLOSURE 1

FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NO. 50-302/LICENSE NO. DPR-72
JUSTIFICATION FOR REQUESTED TEMPORARY WAIVER OF COMPLIANCE
DECAY HEAT REMOVAL POWER SOURCE REQUIREMENTS

License Document Involved: Technical Specifications
Portions: 3.9.8.2

- 1) Discussion of the requirements for which the temporary waiver of compliance is requested:

CR-3 Technical Specification 3.9.8.2, Refuel Operations - Low Water Level, currently requires, while in Mode 6 and with less than 23 feet of water above the fuel, that two decay heat removal loops be operable with their associated normal and emergency power supplies.

The NRC issued a June 11, 1980 letter from Eisenhut to all Operating PWR's that requested licensees revise the Technical Specifications to include the capability to remove decay heat from the reactor while in all modes. A model B&W STS Specification 3.9.8.2 was enclosed with this letter. The model Specification included a footnote which stated the normal or emergency power source may be inoperable for each decay heat removal loop.

Since CR-3 Technical Specifications are based on B&W Standard Specifications, a temporary waiver of compliance is requested on the current CR-3 Specification 3.9.8.2 to allow for the use of the footnote as shown on the B&W STS Specification 3.9.8.2.

- 2) Discussion of the circumstances surrounding the situation including the need for prompt action, and a description of why the situation could not have been avoided:

The CR-3 refueling outage schedule requires entry into Mode 6 on March 26, 1990. Prior to and while in Mode 6, a diesel generator will be out of service. Therefore, entry into Mode 6 is currently prohibited by Specification 3.9.8.2 since one diesel generator will be out of service while the reactor vessel head is removed and less than 23 feet of water is above the fuel assemblies.

2) Cont'd

This situation was not recognized during the preparation of the Technical Specification change request (TSCRN 65) in 1984 due to an administrative oversight. License Amendment 117 was issued in May 1989 containing the Technical Specification change requested by FPC. During planning activities for Mode 6 entry, it was determined that the available decay heat loop power sources would be less than the required power sources of Specification 3.9.8.2. This potential condition was discovered during the "validation" of Specification 3.9.8.2, which could not have been performed prior to this time.

3) A discussion of compensatory actions (if any):

Compensatory actions are not necessary for this situation.

4) A preliminary evaluation of the safety significance and potential consequences of the proposed request:

This temporary waiver of compliance allows CR-3 to utilize the previously approved and recommended B&W STS of the June 11, 1980 NRC letter. Therefore, there is no reduction in safety or increase in potential consequences of utilizing this temporary waiver, since it has received prior NRC approval.

5) A discussion which justifies the duration of the request:

The Refuel 7 outage schedule indicates two occurrences where the refueling water level will be less than 23 feet above the fuel assemblies, March 26 through April 10, and May 8 through May 12. Therefore, this request for temporary waiver of compliance is requested to be effective on or before March 26, 1990 and continue to be in effect through Refuel 7 or until the Technical Specification change request is approved.

6) The basis for the licensee's conclusion that the request does not involve a significant hazards consideration:

This request does not involve a significant hazards consideration. The clarification of power sources for the decay heat removal system is consistent with guidance provided by the NRC and requirements established for other licensees.

Operation of the facility in accordance with the requested action would not involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated. Residual heat removal capability will be maintained with adequate assurances of a reliable power source for each decay heat loop. Therefore, the probability of occurrence is not increased and the consequences of previously evaluated accidents are not affected.

6) Cont'd

Operation of the facility as proposed would not create the possibility of a new or different kind of accident than previously evaluated. Assurance of adequate decay heat removal capability is maintained with redundant decay heat loop operability. Therefore, no new accident conditions are created as a result of this request.

Operation of the facility in accordance with the requested action would not involve a reduction in the margin of safety. A reliable power source for each decay heat removal loop is maintained, thereby assuring adequate residual heat removal capability is maintained.

7) The basis for the licensee's conclusion that the request does not involve irreversible environmental consequences:

This request involves the clarification of necessary power sources for the decay heat removal system and is consistent with guidance provided by the NRC. Therefore, no increase in the amounts, and no change in the types of any effluents that may be released offsite will result from the implementation of this request, and no increase in individual or cumulative occupational radiation exposure will occur.

8) Confirmation that the action by licensee has been reviewed and approved by the Plant Review Committee:

The action requested in this temporary waiver of compliance was reviewed and accepted by the Plant Review Committee on March 22, 1990, Meeting No. 90-12, Item No. 554. There were no significant comments or concerns regarding this request.

REFUELING OPERATIONS

LOW WATER LEVEL

LIMITING CONDITION FOR OPERATION

3.9.8.2 Two decay heat removal (DHR) loops shall be OPERABLE.*

APPLICABILITY: MODE 6 when the water level above the top of the irradiated fuel assemblies seated within the reactor pressure vessel is less than 23 feet.

ACTION

- a. With less than the two required DHR loops OPERABLE, initiate corrective action to return the required loops to OPERABLE status.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.8.2 No additional surveillance requirements other than those required by Specification 4.0.5.

* The normal or emergency power source may be inoperable for each DHR loop.