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# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**DOCKET NO. 970261-EI** 

In Re: Review of Nuclear Outage at Florida Power Corporation's Crystal River Unit No. 3

PAUL F. McKEE

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### FLORIDA POWER CORPORATION DOCKET NO. 970261-EI

### DIRECT TESTIMONY OF PAUL F. MCKEE

I. BACKGROUND

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- Q. WHAT IS YOUR NAME, ADDRESS, AND OCCUPATION?
- A. I am Paul F. McKee. My business address is 15760 West Powerline Street, Crystal River, Florida. I am employed by Florida Power Corporation ("Florida Power" or "the Company") as the Manager of Plant Operations Support at the Crystal River Unit 3 nuclear power plant ("CR-3").
- Q. WHAT ARE YOUR DUTIES AND RESPONSIBILITIES AS MANAGER OF PLANT OPERATIONS SUPPORT AT CR-3 AND HOW LONG HAVE YOU HELD THAT POSITION?
- A. I am responsible for coordinating and supporting interface functions at CR-3 between Systems Engineering, Design Engineering, and Operations. Systems Engineering is responsible for the maintenance of 123 systems at the plant; Design Engineering is responsible for designing and planning modifications to the safety, electrical, mechanical, structural, instrumentation, and other systems at the plant; and Operations has the responsibility for the day-to-day operation of CR-3. I have held this position since October 1996.
- Q. PLEASE DESCRIBE OTHER POSITIONS THAT YOU HAVE HELD AT FLORIDA POWER AND THE DATES THAT YOU HAVE HELD THEM.

A. From September 1992 through September 1996, I served as Director of Quality Programs at CR-3. In that capacity, I was responsible for conducting regular Quality Control Inspections at the plant of all physical work (including modifications), all equipment, and all operations. We conducted these inspections using personnel who were independent from the work or functions being inspected. I was also responsible for our Quality Auditing program. In this connection, I oversaw a diverse group of about twenty auditors -- including engineers -- who were responsible for conducting reviews to determine how all programs at CR-3 were operating, including, for example, the work of design engineers associated with plant modifications.

I served as Plant Manager of CR-3 from August 1983 through September 1992. In this position, I was responsible for the day-to-day operation and maintenance of the plant. I participated in developing and implementing the plant's strategy for meeting all applicable safety requirements and for operating the plant in a prudent and cost-effective manner. In this connection, I reviewed and approved all safety-related modifications to the plant's equipment and systems.

I served as the Operations Manager of CR-3 from 1979 until August 1983. In this capacity, I was responsible for the day-to-day operation of the plant. At the same time, I sat on (and occasionally chaired) the plant's Plant Review Committee (sometimes referred to as the "PRC"). The Plant Review Committee conducted reviews of modifications carried out at the plant in order to ensure that the modifications were performed in

accordance with applicable regulatory procedures and plant policies and to ensure that the modifications met applicable safety requirements.

I served as Technical Support Manager of CR-3 in 1978. In this capacity, I acted as the manager of the systems engineers and was responsible for the engineering support of plant operations.

I held the position of Assistant Plant Manager at CR-3 from 1974 through 1978, as the plant prepared to operate and then started up. I was responsible for operations, maintenance, and licensed operator training.

From 1968 through 1974, I served as the Operations Manager of CR-3 and was involved in the plant design, concept review, operator training, and the training of personnel to obtain a license from the Atomic Energy Commission (later succeeded by the Nuclear Regulatory Commission or "NRC").

Prior to working at CR-3, I worked as a plant engineer at Florida Power's Turner power plant from 1966 through 1968. From 1965 through September 1966, I worked as a Results Engineer at Florida Power, travelling throughout the system, testing power plants.

### Q. WHAT IS YOUR FORMAL EDUCATION?

A. I received a Bachelor's degree in Mechanical Engineering from the University of Florida in 1964, after studying math and physics at Hobart College. I received a Bachelor's degree in Nuclear Engineering Science from the University of Florida in 1969.

### II. PURPOSE AND SUMMARY OF TESTIMONY

#### Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. I will explain the background for the current shutdown of CR-3 and the reasons why it is reasonably necessary to incur the costs associated with that shutdown. Because the plant was taken off line to perform modifications necessary to restore compliance with Florida Power's operating license for CR-3, it is helpful to understand the basic configuration of CR-3, basic regulatory requirements that the Company must meet in operating the plant, and the process by which modifications are made. Accordingly, I describe these matters in my testimony. Against that background, I explain historical modifications and regulatory requirements leading up to the Company's decision to take the plant out of service. Finally, I explain the Company's decision to enter and then to extend the current outage, and the reasonable necessity of incurring the expenses of this outage.

## Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?

A. Yes. In my testimony, I provide a general description of the configuration and operation of CR-3. To summarize, CR-3 is a pressurized water reactor that produces heat through a process of fission. That heated, pressurized water is carried to a pair of steam generators where the heat is used to boil water and to produce steam. The steam is used to drive turbines, which in turn generate electricity.

The plant was designed and built with certain safety squipment and systems called the "Engineered Safeguards system," which has as its

fundamental purpose maintaining the temperature of the fuel below a certain specified limit. This is necessary to ensure that the fuel does not cause damage to the facility and, in turn, to ensure that radioactive material does not escape from the core.

In order to obtain its license to operate CR-3, Florida Power had to demonstrate to the Atomic Energy Commission ("AEC," now the Nuclear Regulatory Commission or "NRC") that the Company had equipment, systems, policies, and procedures in place that were adequate to provide a reasonable assurance of safety. This showing was incorporated in a document called a "Final Safety Analysis Report" or "FSAR" and in Technical Specifications for the plant, which include design limitations for equipment, testing and surveillance requirements, and other information relevant to how the plant will cope with possible emergency situations. The AEC reviewed and approved the Company's Final Safety Analysis Report and Technical Specifications in issuing CR-3's operating license. The operating license incorporates the plant's Technical Specifications. The Company is required to operate the plant in accordance with the operating license.

CR-3 is currently in an extended shut down so that we may make modifications that are necessary to restore compliance with the license for the plant. These modifications arise out of requirements that were imposed on the industry after CR-3 was built to treat the auxiliary feedwater system of a plant as a "safety-related system," now called the "Emergency Feedwater system" (or "EFW" system). The Emergency Feedwater system is used to carry water to the steam generators. The

NRC first required that this system be deemed safety-related after the well-publicized accident at Three Mile Island in 1979, which implicated the need for this system to cope with certain safety risks. This resulted in the adoption of a series of regulatory requirements and efforts by the industry to retrofit plants ever since.

Florida Power made a number of modifications over the years to respond to these requirements. The Company follows detailed procedures in connection with safety-related plant modifications. This procedure is mandated, in part, by NRC regulations. The procedure includes a careful process of evaluation of modifications by design engineers to determine potential safety issues, verification, management approval, selected reviews by a plant committee and independent review committee, and documentation of modifications.

With the benefit of input from industry groups and its plant designer, Babcock & Wilcox ("B&W," now Framatome Technologies), the Company analyzed the configuration of CR-3 and developed plans to modify the plant to conform to the NRC's post-Three Mile Island requirements. Following the procedures outlined above, and with the concurrence of the NRC, the Company upgraded its auxiliary feedwater system to a safety-related system. The Emergency Feedwater system includes an electric-powered pump that requires an emergency power source for the system in the event of a loss of the normally available offsite power. Although the electric-powered feedwater pump had previously been provided with an emergency power source -- namely, Emergency Diesel Generators -- to supply electricity in the event of a loss of offsite power, before 1980 this

source had to be actuated manually by plant operators. After 1979, the Company was required to ensure that an Emergency Diesel Generator would be actuated automatically to power the Emergency Feedwater system.

Over the years, the Company made a number of modifications to the plant and to its control systems and procedures to accommodate this mandatory load, on the Emergency Diesel Generator. Among other things, in 1987, the Company sought to reduce the hydraulic load of the electric-powered Emergency Feedwater pump by providing for the simultaneous operation, in the event of an emergency, by the second, steam-driven pump that did not require back up by the Emergency Diesel Generators.

The Company was also required to engage in hypothetical emergency planning regarding the performance of the Emergency Feedwater pumps themselves. In particular, the Company took steps to guard against malfunction by the pumps in extreme, hypothetical emergency operating conditions.

Each plant made by the same manufacturer pursued other solutions that the plant deemed reasonable and suitable for its particular configuration. Certain of these plants encountered difficulties or significant costs in making these modifications. Florida Power made the judgment at the time to pursue what appeared to be suitable, cost-effective solutions for CR-3.

During the refueling outage commenced in February 1996, CR-3 engineers added more accurate, state-of-the-art instrumentation to the Emergency Diesel Generators. In the course of analyzing this

providing for simultaneous operation of both Emergency Feedwater pumps might result in a malfunction caused by a problem called "cavitation" in a certain hypothetical situation. "Cavitation" occurs when there is an excessive flow of feedwater through the pumps. Accordingly, the Company determined to reverse the 1987 modification based on the fact that the Emergency Diesel Generators had been upgraded, and the manufacturer of the diesels assured the Company that the generators could support the electric-powered Emergency Feedwater pump operating alone (without the assistance of the steam-driven pump). With the benefit of this solution to the recently identified design problem, we were able to restart the plant and end the refueling outage.

modification, the engineers became concerned that the 1987 modification

In September 1996, a lube oil pipe in the main turbine unexpectedly ruptured. The Company had to shut down the plant to diagnose and remedy this problem. The pipe ruptured due to vibration in the operation of the turbine combined with latent imperfections in the pipe. The pipe was not observable while the plant was in operation.

In the meantime, CR-3 engineers and the NRC came to focus on a concern that the 1996 modification to the Emergency Feedwater system had introduced inadvertently other safety issues that the Company and the NRC had not fully considered. Upon further analysis, it became apparent that the Company would have to make extensive modifications to the plant -- particularly concerning the Emergency Diesel Generators and the Emergency Feedwater system -- to restore compliance with the conditions of the CR-3 operating license.

Once this situation was discovered, the Company had to redress it within 72 hours or keep the plant shut down. Because the Company could not restore compliance within that time period, the Company determined to enter an extended outage to permit a thorough investigation and the completion of necessary modifications.

Even if this discovery had been made sooner, however, the same kind of outage would have been required to deal with the situation. This situation involved a recognition that the Company was out of compliance with conditions of its license (the ability to respond to certain remote, hypothetical emergency situations) and, upon discovery, the Company had to redress the problem or shut the plant down in 72 hours. We had exhausted every practicable alternative to making the extensive modifications that now must be made. There was no alternative to entering such an extended shutdown.

In addition, if the need for these modifications had been recognized earlier, the necessary work could not have been done within the timeframe of any prior outage. The modifications are too extensive, and the Company was fully occupied with other exigencies during prior outages. Accordingly, the current outage could not have been reasonably avoided.

- A. DESCRIPTION OF CR-3 AND ENGINEERED SAFEGUARDS SYSTEM
- Q. SO THAT WE MAY UNDERSTAND THE CONTEXT OF THE MODIFICATIONS BEING MADE DURING THE CURRENT OUTAGE, WILL YOU DESCRIBE THE BASIC CONFIGURATION AND OPERATION OF CR-37
- A. Yes. CR-3 is a pressurized water reactor. The reactor fuel, through fission, heats pressurized water surrounding the fuel. That heated, pressurized water then travels from the reactor through large diameter pipes to tubes housed within two steam generators. (The circulation of water to and from the core is called the "primary system.") The heat given off from the water forced through the steam generator tubes is used to boil feedwater circulating outside the tubes that carry the pressurized water from the reactor. (The circulation of the feedwater through the steam generators is called the "secondary system.") This produces steam, which is used to drive a turbine-generator. The turbine-generator in turn produces electricity. The pressurized water that had been heated by the reactor fuel is cooled by this process and is returned to the reactor core to repeat the cycle.

Likewise, the steam utilized to drive the turbine-generator is condensed into water and recycled through the steam generators.

Plants like CR-3 have an Engineered Safeguards system that is designed to protect the nuclear reactor core in the event of emergency conditions. The principal safety system is designed to cool the reactor fuel within limits specified in CR-3's license.

To meet the critical objective of cooling the reactor fuel, CR-3 is equipped with two identical (and redundant) systems (which include the High Pressure Injection pump, pressurized core flood tank, and the Low Pressure Injection pump) that stand ready to pump water into the reactor vessel in the event of an accidental loss of coolant. The pumps are normally powered by electricity generated outside CR-3 (for example, by other Florida Power generating plants), referred to as "offsite" power. Florida Power is required to maintain a backup power source for CR-3's safety system. Accordingly, each set of pumps is backed up by an Emergency Diesel Generator that can generate electricity in the event that offsite power is interrupted. Please see PFM Ex. 1 for a basic schematic diagram of CR-3.

Babcock & Wilcox (now known as Framatome Technologies Inc.) designed the nuclear steam supply system of CR-3 in the late 1960s and early 1970s. The Engineered Safeguards system of the plant is provided to cope with a set of hypothetical "design basis" accidents. A design basis accident is a chain of events prescribed by the NRC that a plant must be specifically engineered to withstand. At the time that CR-3 was built, the most severe accident that engineers anticipated was an accidental break of large coolant pipe (e.g., a 36-inch pipe) -- resulting in a significant loss of coolant -- combined with a loss of offsite power and the active failure of any other single piece of equipment. Plants like CR-3 were designed to cope with this combination of events. This type of safety planning is called "single failure-proof" design, and the particular situation described is referred to as a "Large Break Loss of Coolant

Accident." At the time CR-3 was built, engineers and the NRC believed that if a plant were capable of dealing both with this situation and with a one inch instrument line break, it could deal with all sizes of loss of coolant accidents in between the two bounding analyses.

### B. EXPLANATION OF CR-3 LICENSE REQUIREMENTS

- Q. CAN YOU SUMMARIZE THE REGULATORY PROCESS ASSOCIATED WITH
  THE INITIAL LICENSING OF CR-3 BY THE NRC?
- A. Yes. CR-3 was subjected to a rigorous licensing process prior to beginning operation in 1977. First, a multi-volume application for a construction permit was prepared and submitted for review. The NRC Staff examined the application to determine whether the CR-3 design was safe and consistent with NRC rules and regulations; whether valid methods of calculation were employed and accurately carried out; and whether analyses and evaluations were of sufficient depth and breadth to support NRC approval with respect to safety. When the NRC Staff was satisfied that acceptance criteria were met, it prepared a Safety Evaluation Report ("SER") summarizing the results of the NRC Staff review.

Following publication of the Safety Evaluation Report, a review was performed by the independent, statutory Advisory Committee on Reactor Safeguards. The Advisory Committee then prepared a report presenting the results of its evaluation and recommending that a construction permit be granted. A public hearing was then held. At the completion of the hearing, a construction permit was issued.

Prior to the completion of construction, a second application was prepared and filed with the NRC, this time for an operating license. As a part of this application, Florida Power conducted and submitted a Final Safety Analysis Report (or "FSAR"), which described the operating characteristics of the plant equipment and how Florida Power proposed to meet all applicable safety requirements, including testing and surveillance procedures. Among other requirements, Florida Power is required by NRC regulations to ensure that the temperature of CR-3's reactor fuel does not exceed an established limit, which is set to provide a margin of safety against damage to the fuel and a possible exposure to the public of radioactive materials. Florida Power was required to demonstrate in its application how the Company proposed to fulfill this safety requirement.

In this connection, Florida Power had to demonstrate in its Final Safety Analysis Report that the Company could satisfactorily cope with all "design basis" accidents. The Final Safety Analysis Report presents numerous examples of hypothetical, design basis accidents that might result in damage to a reactor core. But the NRC does not prescribe how any particular plant must deal with such accidents. Every licensee must demonstrate that it is able to respond to the occurrence of all design basis accidents.

As I described above, in this connection, Florida Power was required to demonstrate that it could satisfactorily respond to a hypothetical design basis accident (e.g., a large break loss of coolant accident) at the same time that it might incur one condition failure (e.g., a loss of offsite power)

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and one "single" failure (e.g., the failure of a High Pressure Injection pump).

In licensing CR-3, the NRC followed a process similar to that employed for approving the construction permit. Specifically, the NRC Staff and Advisory Committee on Reactor Safeguards reviewed Florida Power's submission. In the course of licensing and regulating a licensee, the NRC may raise questions about the licensee's Final Safety Analysis Report, and the licensee must respond until the NRC is satisfied. The NRC subsequently prepared a Safety Evaluation Report, approving the Company's submission. Following successful completion of the review. the NRC issued an operating license.

The license incorporated the representations that Florida Power had made about the operating characteristics of the plant. The license incorporates two (three-inch thick) olumes of Technical Specifications for CR-3, which describe, among other things, safety limits, the characteristics of its Engineered Safeguards system, physical operating limits established for safety equipment, testing and surveillance requirements, and administrative controls.

In order for a piece of equipment or system to be considered operable according to the Technical Specifications, it must not only be capable of performing its intended function, but all necessary instrumentation, controls, electrical power, cooling or sealing water, lubrication, or other auxiliary equipment required for the equipment or system to perform its function must also be capable of performing their related support functions. Therefore, a piece of equipment or system can be functioning

# C. DESCRIPTION OF PLANT MODIFICATION PROCESS AND OVERSIGHT

- Q. PLEASE DESCRIBE THE PROCEDURES THAT FLORIDA POWER FOLLOWS
  IN MAKING MODIFICATIONS TO ITS ENGINEERED SAFEGUARDS
  SYSTEM?
- A. NRC regulations -- codified at 10 C.F.R. § 50.59 -- specify the requirements that must be followed to modify a safety-related system at a nuclear power plant. These procedures have been in force from the inception of the operation of CR-3. These procedures require that the licensee evaluate the modification against a set of specific criteria that address the requirements of the plant's Technical Specifications and Final Safety Analysis Report. As I have described, the Final Safety Analysis Report documents the results of the engineering analyses of the plant, which have been reviewed and approved by the NRC as a condition of granting the license.

As I have also described, the Technical Specifications for CR-3 comprise detailed specifications for how various items of equipment and

various systems at CR-3 must function, including, among other things, surveillance procedures for testing equipment and systems. For example, the Technical Specifications pertaining to the Emergency Feedwater system require, among other things, that plant operators verify (usually through "walk downs") that there are no leaks and that temperature, pressures, and valve positions meet specifications. Operators must start and operate the Emergency Feedwater system every 45 days to ensure that all systems and equipment function properly.

Before any modification is made, the licensee must specifically analyze and respond to three questions: (1) could the modification increase the probability of occurrence or consequences of a malfunction of equipment important to safety previously evaluated in the Final Safety Analysis Report? (2) could the modification create a possibility for an accident or malfunction of a different type than any evaluated previously in the Final Safety Analysis Report? and (3) will the modification cause a reduction in the margin of safety as defined in the basis for any of the plant's Technical Specifications? If the answer to any of these questions is "yes," the modification will create an "Unreviewed Safety Question" or "USQ," namely, a condition that the NRC did not review and accept in approving the Company's operating license. In such circumstances, the licensee must obtain approval from the NRC before making the modification.

At Florida Power, the analysis required under Section 50.59 (sometimes called n "50.59" analysis) is conducted in the first instance by Design Engineers. The Company maintains its own Design Engineering

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group, which has consisted of approximately 50 design engineers from 1979 through 1996. These engineers are divided into various units, including. among others, electrical, mechanical, structural. instrumentation, and safety analysis. Each group has a manager or supervisor.

In making a modification, the Design Engineers assigned to the systems that will be affected by the change prepare conceptual designs, in consultation with other plant groups. Alternatives to the design and the assumptions underlying the design are considered and discussed. (On occasion, the Company has engaged an Architect-Engineer, Gilbert Commonwealth Inc. (now Parson's Power), to design plant modifications.)

Once the concept for a modification is developed, the Design Engineers must prepare a Modification Approval Record (or "MAR"). Florida Power has specific written procedures that govern the documentation of the Modification Approval Record. Under these procedures, Design Engineers must review plant drawings and procedures to ensure that any proposed modification is compatible with other equipment and systems. Further, as part of the documentation process, the Design Engineer must specifically address in writing the criteria set forth in 10 C.F.R. § 50.59.

In order to conduct the 50.59 analysis, the Design Engineers are required to review the plant's Final Safety Analysis Report and to consider specifically the impact of any proposed modification on the plant's Technical Specifications. As I have explained, in conducting the 50.59 analysis, Design Engineers must also consider whether the proposed

modification may otherwise increase the risk of any accident occurring, the consequences of any accident, or the possibility of a malfunction of equipment.

Once a modification is approved and implemented, the plant's design records must be modified to reflect the modification made.

A Modification Approval Record may not be "closed out" until required steps are documented. The Company has procedures in place to monitor the completion of the various documentation requirements.

Although these procedures have remained in force throughout the time the plant has been in operation, the procedures have been improved over time, as the nuclear industry has become more sophisticated in its evaluation, implementation, and documentation of plant modifications. In 1992-1993, Florida Power initiated a Business Process Improvement ("BPI") study of the Modification Approval Record process. As a result of this study, the Company implemented a process called the Plant Equipment Equivalency Record, to account for the fact that the Company is forced at times to purchase equivalent replacement parts for old equipment that is no longer manufactured. The Company also determined to exclude from the Modification Approval Record process less significant, non-safety related modifications, in order to make the process more efficient and effective.

At Florida Power, once the Design Engineers have completed the Modification Approval Record process, the proposed modification with supporting documentation is reviewed independently by a Verification Engineer.

If the Verification Engineer approves the proposed modification, it must be reviewed and approved by the Supervisor for the relevant Design Engineering group or groups involved in developing the design. Again, the Supervisor must review the modification package independently to determine whether the modification is appropriate.

Next, the proposed modification must be reviewed and approved by a plant committee comprising persons who are independent from the persons whose work is being reviewed. This committee is called the Plant Review Committee. NRC regulations require the establishment of this committee, govern the qualifications and expertise of its members, and prescribe how it must operate. The members consist of top level managers from CR-3, including managers from Operations, Maintenance, Health Physics, Quality, and Engineering.

The Plant Review Committee is charged with the responsibility, among others, to ensure that a proposed modification meets applicable NRC safety requirements. Finally, if the Plant Review Committee approves the modification, the Plant Manager at CR-3 will conduct a final review and must sign off on any safety-related modification.

- Q. APART FROM WHAT YOU HAVE DESCRIBED, DOES FLORIDA POWER
  HAVE ANY OTHER ASSURANCE THAT MODIFICATIONS OF SAFETYRELATED EQUIPMENT AND SYSTEMS ARE MADE IN AN APPROPRIATE
  MANNER?
- A. Yes, it does. As I have described, in connection with modifications of safety-related equipment or systems, the Company completes in writing

an analysis of the NRC's safety requirements prescribed in 10 C.F.R. § 50.59. This analysis is not only checked and cross-checked within the Company itself, but is made available to the NRC as well. The Company provides 50.59 reviews to the NRC within six months of each refueling outage. In addition, the Company must provide the NRC with an update of its Final Safety Analysis Report every two years, which includes changes since the last update by the Company.

Further, the Company maintains two plant review committees, as required by NRC regulations. I previously described one (specifically called the "Plant Review Committee"). The second committee is called the Nuclear General Review Committee (or "NGRC") and consists of twelve members, over half of whom are not Florida Power employees. The non-Florida Power members typically have been former executives from other nuclear power plants. The outside members have provided an additional source of information about industry experience. The remaining members come from various areas within CR-3, including the Licensing, Training, Operations, and Health Physics units. I served as Chairman of the Nuclear General Review Committee from 1992 through 1996.

The Nuclear General Review Committee periodically reviews the operations at CR-3 for safety compliance. Among other things, the committee reviews selected safety-related modifications. The committee evaluates the technical adequacy of modifications based on the past experience of other plants and the committee members' understanding of nuclear operations and systems. Committee members call upon their own diverse backgrounds in assessing whether hypothetical accident situations

may arise that the Company may have failed to address, whether modifications are consistent with the plant's Final Safety Analysis Report and Technical Specifications, and whether the 50.59 review has been documented in good fashion.

In addition, over the years, the Company has implemented programs to improve and enhance the integrity of its modification documentation process. In the mid-1980's, Florida Power developed an Enhanced Design Basis Document ("EDBD"), consolidating key design basis information. The Company completed a five-year program, at an expense of \$5 million, with the assistance of Babcock & Wilcox and Gilbert Commonwealth, Inc. to collect design basis information and to improve its accessibility:

In the same time frame, the Company established the Configuration Management Improvement Program, which generated computer programs to facilitate locating and collecting safety-related documents. In certain situations where information was incomplete, the Company recreated the design basis of the equipment. At the same time, the Company evaluated the equipment at the plant to determine whether it continued to meet safety requirements. In some instances, modifications were made to correct inadvertent deviations from safety standards.

# IV. REGULATORY DEVELOPMENTS AND HISTORICAL MODIFICATIONS TO CR-3'S ENGINEERED SAFEGUARDS SYSTEM

### A. IMPACT OF THE THREE MILE ISLAND ACCIDENT

- Q. WHAT IS THE BACKGROUND TO THE MODIFICATIONS NOW BEING MADE AT CR-3?
- A. The modifications that are being made during the current outage have their genesis in a series of regulatory changes that occurred in the aftermath of the accident at the Three Mile Island Unit 2 nuclear power plant in 1979. This Three Mile Island nuclear unit suffered partial damage to its fuel core during that accident. Since that time, Florida Power and other licensees responsible for operating nuclear power plants that were designed and licensed before the Three Mile Island accident have been engaged in making modifications to their plant equipment and systems to help prevent problems similar to that experienced at Three Mile Island.
- Q. HOW DID THE ACCIDENT AT THREE MILE ISLAND AFFECT THE STRATEGY OF THE NRC AND THE NUCLEAR POWER INDUSTRY IN SAFETY PLANNING?
- A. The accident at Three Mile Island Unit 2 started with a leak in the primary coolant system of significantly smaller size than 36 inches. This situation is often referred to as a "Small Break Loss of Coolant Accident." This accident changed the way the industry and the NRC look at nuclear safety issues. Specifically, the Three Mile Island accident highlighted the need to rely for safety purposes not only on the High Pressure Injection pump, Low Pressure Injection pump, and pressurized core flood tank that are

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designed to pump water directly into the reactor vessel (which contains the reactor fuel), but also on a separate set of pumps used to pump water into the two steam generators. The latter pumps are called Emergency Feedwater pumps.

This is so because, although Emergency Feedwater pumps are not needed to mitigate against a Large Break Loss of Coolant Accident, the Emergency Feedwater system is critical to coping with a Small Break Loss of Coolant Accident. Specifically, in the event of a Large Break Loss of Coolant Accident, large amounts of water would be pumped into the reactor vessel to cool the reactor fuel within licensing limits. Emergency Feedwater system, which removes heat from the steam generators in certain emergency situations, would not come into play because the steam generators would not be functioning during a Large Break Loss of Coolant Accident. In the event of a Small Break Loss of Coolant Accident, however, there we ld be a loss of much less water from the primary system that cools the core, so significantly smaller amounts of cool water would be pumped into the reactor vessel. Therefore, additional cooling would be required through operation of the steam generator. Thus, the Emergency Feedwater pumps may be necessary to provide emergency feedwater to the steam generators to assist in removing heat produced by the reactor.

After the Three Mile Island accident, the NRC increased efforts to tighten already rigorous safety standards applicable to nuclear power plants. The NRC issued numerous new regulatory announcements or requirements over the ensuing years. Among other things, the NRC issued

NUREG 0737, requiring nuclear plants to design against the situation of a Small Break Loss of Coolant Accident and, in particular, to treat the Emergency Feedwater system as a vital, "safety-related" system. Though imposing this requirement, the NRC did not prescribe specifically how it was to be carried out. Nor is there any single "right" way to do it.

Because the original Emergency Feedwater components were designed as part of an auxiliary pumping system and were not required to be safety-related, they were not built and designed with the same extraordinary safety margins required of safety-related equipment installed during the construction of CR-3. CR-3 and other plants like it therefore were required to upgrade their auxiliary feedwater systems.

#### B. POST-THREE MILE ISLAND MODIFICATIONS

- Q. HOW DID THE INDUSTRY IN GENERAL, AND FLORIDA POWER IN PARTICULAR, RESPOND TO THIS REQUIREMENT?
  - In the ensuing years, owners of facilities like CR-3 made a number of modifications to their Engineered Safeguards system. In this vein, in 1979, Florida Power and the owners of other Babcock & Wilcox plants formed an owners' group to address the regulatory issues arising out of the event at Three Mile Island and to share technological information and operating experience. These companies worked together with information they obtained from Babcock & Wilcox concerning the reliability of B&W plant Emergency Feedwater systems and studied engineering approaches that might enable them to implement new NRC requirements. The individual member companies evaluated this information as part of each

company's own assessment of the steps it must take to meet all applicable regulatory requirements.

Further, Florida Power monitored closely reports of problems or NRC action involving other nuclear power plants in order to anticipate problems and areas of regulatory concern before they became implicated at CR-3.

Finally, in discussing and µ!anning appropriate modifications to deal with the NRC directives issued as the result of the accident at Three Mile Island, the Company worked closely with appropriate vendors and consultants, including Coltec Industries, the manufacturer of its Emergency Diesel Generators, and Gilbert Commonwealth Inc., the Company's Architect-Engineers.

Because each nuclear facility was configured somewhat differently from the others, each company faced certain unique challenges in identifying and implementing solutions to the issues raised by the Three Mile Island accident and resulting regulatory requirements. For example, Davis Besse had two steam-driven Emergency Feedwater pumps, whereas CR-3 had one steam-driven pump and one electric-powered pump. As i will explain, the configuration of these pumps at CR-3 played an instrumental role in the modifications that Florida Power made over time to respond to regulatory directives. By way of further contrast, the Oconee nuclear facilities did not have Emergency Diesel Generators, but they used hydro-generators instead.

Following the Three Mile Island accident, Florida Power thoroughly reviewed its own safety equipment and systems to assess the steps that had to be taken to address the concerns that arose from the Three Mile

Island accident and resulting regulatory requirements. These included not only engineering modifications, but a host of system improvements, including the training of plant personnel.

In this connection, between 1979 and the present, a number of plants in the B&W owners' group, and other plants licensed before the Three Mile Island accident, made modifications to their Emergency Diesel Generators and their Emergency Feedwater systems as a means to cope with a Small Break Loss of Coolant Accident (consistent with single failure-proof planning). It is important to appreciate that these modifications were made to preserve or increase safety margins for hypothetical emergency conditions rather than to sustain the normal, safe operation of the plants. Florida Power, in particular, has made various modifications to CR-3's Engineered Safeguards system in order to address emerging regulatory requirements. To understand these modifications, however, it is helpful to appreciate the basic configuration of the Emergency Feedwater equipment that was necessitated by the treatment of the Emergency Feedwater system as a safety-related system.

In order to be prepared for a Large Break Loss of Coolant Accident, CR-3 was constructed with the set of emergency pumps and pressurized tank previously described (the High Pressure Injection pump, the Low Pressure Injection pump, and the core flood tank) that stood ready to supply water directly into the reactor vessel in the event of a rupture of the reactor coolant system. To guard against a malfunction in these pumps, CR-3 was equipped with a second set of pumps and pressurized tank just like the first. These redundant systems are referred to as the

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"A" and "B" systems. Both sets of pumps are normally powered by electricity generated from sources outside the nuclear power plant (such as other Florida Power generating plants).

As discussed, in designing its safety system, Florida Power was required to hypothesize that this offsite electric power might be lost during a loss of coolant emergency. To guard against this, CR-3 was equipped with an Emergency Diesel Generator for each set of emergency pumps (the "A" Emergency Diesel Generator and the "B" Emergency Diesel Generator) and other "A" and "B" loads, too.

After 1980, Florida Power was required to treat its Emergency Feedwater pumps also as safety-related and to treat the Emergency Feedwater cooling system as a safety-related system. This meant that Florida Power was required to guard against the possibility of a loss of offsite power to the Emergency Feedwater pumps during a loss of coolant accident when the pumps would be needed. At the time of the Three Mile Island accident, plants like CR-3 were generally equipped with at least two, redundant Emergency Feedwater pumps. One of Florida Power's two Emergency Feedwater pumps (the "B" Emergency Feedwater pump) is powered by a steam turbine; so the possibility of a loss of offsite electrical power would not present a problem to the operation of this pump. The first of the two pumps, however (the "A" Emergency Feedwater pump) is powered by a motor that requires electricity The "A" and "B" Emergency Feedwater pumps are different in order to provide diversity in the design such that a latent manufacturing or design problem would not affect both pumps.

In 1980, with the benefit of and consistent with guidance developed through the B&W owners' group, Florida Power modified its Engineered Safeguards system to ensure that the "A" Emergency Diesel Generator would actuate automatically to provide the "A" Emergency Feedwater pump with a source of back-up power in the event of a loss of offsite power. Prior to that time, operators had to load the "A" Emergency Feedwater pump manually onto the "A" Emergency Diesel Generator. Of course, the same Emergency Diesel Generator (the "A" generator) was expected to actuate automatically to provide back-up electrical power to the "A" emergency equipment used to inject water directly around the reactor fuel. This meant that an increased electrical load would now be imposed upon the "A" Emergency Diesel Generator automatically in the event of certain hypothetical emergency situations, thus reducing the operating margins of the Emergency Diesel Generator.

### C. LOADING ON THE EMERGENCY DIESEL GENERATORS

- Q. DID FLORIDA POWER TAKE STEPS TO LESSEN THE LOAD ON CR-3'S EMERGENCY DIESEL GENERATORS?
  - A. Yes. The Technical Specifications for the Emergency Diesel Generators included maximum kW ratings for the equipment for different time intervals. These were relevant to the Company's description of the ability of its equipment and systems to cope with different contingencies. According to the Technical Specifications, at the time the plant was built, the Emergency Diesel Generators should run continuously for no longer than 30 minutes between 3001 and 3300 kW, and at lower kW levels for

longer, specified periods of time. To appreciate the significance of this point, it is important to recall that CR-3 has extensive Technical Specifications (filling two volumes) that prescribe the manner in which the plant must be operated. Florida Power is required to meet all Technical Specifications for CR-3 as a condition of its federal license to operate the plant. Therefore, Florida Power had to take steps to ensure that it would not exceed the 30 minute rating for the "A" Emergency Diesel Generator in a hypothetical emergency situation where the "A" Emergency Feedwater pump would be loaded onto that generator.

In order to accomplish this, in 1980, Florida Power installed a kW monitor system that would sound an alarm if the "A" Emergency Diesel Generator entered the 30 minute rating and that would repeat the alarm 25 minutes into the 30 minute rating. The alarms were intended to afford the plant operator an opportunity to manage the load on the Emergency Diesel Generators so as to tailor the operation of electric-powered equipment within the loading limits of the Emergency Diesel Generators. No two emergency situations will be exactly alike, and thus no two emergencies will require exactly the same equipment at the same time. Thus, plant operators would be in a position to disconnect certain equipment in an actual emergency to maintain Emergency Diesel Loading margins.

As a precaution, Florida Power added a circuit that would automatically turn off (or "trip") the "A" Emergency Feedwater pump if it operated in the 30 minute rating for 30 minutes, thus necessitating operator intervention.

Florida Power made this modification after consulting with its Architect-Engineer, Gilbert Commonwealth Inc. and with the manufacturer of the Emergency Diesel Generators, Coltec Industries.

At the time that Florida Power made this modification, the Company believed that it would adequately deal with all known loading constraints on the Emergency Diesel Generators. The Company continued to modify loads, however, on an ongoing basis. It was necessary to recalculate loads every time maintenance work or modifications were made to any piece of equipment that might be powered by the Emergency Diesel Generators, as these actions could theoretically affect loading limits.

Florida Power made additional modifications over a period of years either to manage the load on the Emergency Diesel Generators or to increase the capacity of those generators. In 1987, Florida Power specifically considered replacing its Emergency Diesel Generators with more powerful equipment and ultimately rejected this alternative. This decision was based on research indicating that new Emergency Diesel Generators would have to be placed in a different physical location from its existing generators, that cables would have to be changed out to handle the greater load, and that the modification would entail a major disruption in the configuration of the plant. After careful analysis, Florida Power concluded that it could avoid such a costly modification by making less extensive electrical re-configurations of its own Engineered Safeguards system.

Accordingly, in October 1987, Florida Power undertook to have the "B" Emergency Feedwater pump, which was steam-powered, provide

direct and automatic back-up support for the electric powered "A" Emergency Feedwater pump. Florida Power concluded that this would be a cost-effective modification appropriate to the needs of CR-3 that would ensure that adequate operating margins on the Emergency Diesel Generators could be maintained.

This modification was accomplished by arranging to have the valve that operated the "B" pump powered by the "A" Emergency Diesel Generator so that when the "A" system was turned on both the electric powered Emergency Feedwater pump and the steam-powered Emergency Feedwater pump would operate simultaneously. This valve is referred to as "ASV 204." See PFM Ex. 2 (consisting of MAR documentation for temporary and subsequent permanent installation for this modification). Because the steam-powered "B" pump would assist the electric-powered "A" pump in this situation, the work performed by the "A" pump was reduced, which in turn reduced load on the "A" Emergency Diesel Generator. This modification provided the added benefit of ensuring that the "A" Emergency Diesel Generator would be available to power the valve to the "B" Emergency Feedwater Pump in the event of the loss of the "B" batteries that operated that valve.

Subsequently, in 1988, in communication with the NRC, Florida Power committed to employ certain emergency diesel load management programs, and adopted certain testing (or "surveillance") requirements for its Emergency Diesel Generators.

In 1988, as part of its ongoing monitoring of its Engineered Safeguards system, Florida Power determined that it would be desirable

to reduce loading further on the Emergency Diesel Generators by an electronic re-configuration in order to avoid reducing the operating margins of the diesels in certain situations. The Company engaged its Architect-Engineer, Gilbert Commonwealth Inc., to design a modification that would cause the "A" Emergency Feedwater pump to turn off automatically (or "trip off") when the water pressure in the reactor core fell to 500 pounds per square inch gauge (or "psig") in a hypothetical situation involving a loss of offsite power. This would occur during a significant loss of coolant. The Low Pressure Injection pump is actuated when pressure reaches that point. The Low Pressure Injection pump and the Emergency Feedwater pumps are not needed at the same time. Thus, an opportunity existed to shut down the Emergency Feedwater pumps in this situation and to reduce load on the Emergency Diesel Generators at that time. The Company installed this modification in 1990. See PFM Ex. 3 (consisting of MAR documentation for this modification).

Also in 1990, the Company upgraded both of its Emergency Diesel Generators to increase their engine ratings by, among other things, creating a larger air intake, modifying the turbocharger, and adding new lube oil coolers. As a result of these upgrades, the Company was able to increase the maximum 30 minute ratings of the generators from 3300 kW to 3500 kW. These modifications were designed by Coltec, the Emergency Diesel Generator manufacturer. That same year, the Company modified its Engineered Safeguards system to manage better the block loading of electric-powered equipment onto the Emergency Diesel Generators during emergency situations.

"Block loading" refers to the fact that load from various pieces of electric-powered safety-related equipment was placed on the Emergency Diesel Generators by one piece of equipment at a time, each accounting for a certain quantity -- or "block" -- of power produced by the Emergency Diesel Generators. Because equipment tends to draw more electrical load when it is first loaded than during normal operation, it is necessary to stagger load blocks to avoid overloading the Emergency Diesel Generators.

In contrast to the modifications that we were making at CR-3, Florida Power & Light installed two new Emergency Diesel Generators in 1990 at its Turkey Point nuclear facilities, taking both nuclear units out of service for approximately a year to accomplish the modifications. We hoped to avoid extensive hardware modifications of this nature, and related outages, by modifying CR-3's electronic control systems and existing hardware.

As part of its standard operating rocedures and in conformance with NRC-required surveillance procedures, the Company continued to monitor Emergency Diesel Generator loading and to calculate hypothetical loading situations, both through its own engineers and with the assistance of the Company's Architect-Engineer, Gilbert Commonwealth Inc. Any change or maintenance to any of the equipment powered by the diesels -- and even wear and tear on plant equipment -- could affect diesel loading margins, and calculations had to be run after each refueling outage. A licensee is required to test and closely monitor the condition of all safety-related equipment, including Emergency Diesel Generators. In addition, as new analytical tools and technology became available that might enable

the Company to enhance and optimize its Engineered Safeguards system, the Company sought to take advantage of those opportunities.

In this connection, in November 1991, Florida Power replaced its Emergency Diesel Generator block-loading relays with highly accurate quartz timing relays to optimize the accuracy of the block-loading sequence for the Emergency Diesel Generators. At the beginning of the next year, the Company upgraded batteries capable of indirectly reducing load on the Emergency Diesel Generators by installing a new battery bank to handle non-safety-related loads. Also in 1992, Florida Power added a comprehensive engine/generator monitoring system to the Emergency Diesel Generators to improve the Company's ability to ensure that operating margins were maintained on the Emergency Diesel Generators.

From 1993 through the refueling outage that commenced in February 1996, Florida Power continued to monitor Emergency Diesel Loading operating margins and to make adjustments to its Engineered Safeguards systems to maintain those margins.

### D. EMERGENCY FEEDWATER SYSTEM

- Q. DID FLORIDA POWER CORPORATION ADDRESS OTHER SIGNIFICANT ISSUES INVOLVING THE EMERGENCY FEEDWATER SYSTEM THAT HAVE A BEARING ON THE CURRENT OUTAGE?
  - Yes. As I mentioned earlier in my testimony, the Company is undertaking at this time to add cavitating venturis to the Emergency Feedwater pumps to regulate feedwater flow through the pumps. The Company made less extensive modifications to the control system over the years in order to

ensure appropriate flow of feedwater through the pumps and to prevent pump failure in emergency situations.

### Q. PLEASE EXPLAIN THE STEPS THAT THE COMPANY TOOK.

NRC issued in the 1980's, the B&W owners' group developed information that was used by each individual licensee to make determinations about how best to meet those requirements. With the benefit of this information, Florida Power, among other measures, installed a system called "Emergency Feedwater Initiation and Control" or "EFIC" to control the level of water pumped by the Emergency Feedwater system. Previously, the various pieces of equipment that make up the Emergency Feedwater system were controlled manually or by the plant non-safety control system. The Emergency Feedwater Initiation and Control system ensured that the various pumps and vr'ves that comprise the Emergency Feedwater system could be controlled automatically and in an integrated fashion.

This modification took about four years to develop and implement. The design work began in about 1981. Florida Power consulted with its Architect-Engineer, Gilbert Commonwealth Inc. and Babcock & Wilcox, in developing the system. The Emergency Feedwater Initiation and Control system was installed in August 1985.

The Emergency Feedwater Initiation and Control system was designed, in part, to take into account possible cavitation in the Emergency Feedwater lines, and to optimize the operation of the

Emergency Feedwater system. The term "Cavitation" is used to describe a condition that occurs when water pressure at the inlet of the Emergency Feedwater drops low enough for steam bubbles to form. If the problem is extensive enough, it can cause pump failure. It may occur when water flows through the Emergency Feedwater pumps at an excessive rate or, conversely, where flow into the pump is insufficient.

The Emergency Feedwater Initiation and Control system was designed so that certain valves regulating the flow of feedwater through the pumps would remain in the open position in the event of a loss of electric power to those valves. The Company and its consultants determined that this design was acceptable because the system was specifically designed to have other valves that would stop the flow if the steam generators became too full, called "overfill protection."

In 1987, Florida Power made further modifications to its Emergency Feedwater system to help guard against pump runout or cavitation. Specifically, Florida Power engaged Gilbert Commonwealth Inc. to design and install a flow limiting circuit to the Emergency Feedwater Initiation and Control system to keep the flow from exceeding a maximum limit.

Florida Power continued thereafter to monitor the performance of its Emergency Feedwater system and to consider the adequacy of the system to respond to various hypothetical accident situations. For example, in 1992, the Company evaluated the system in the hypothetical emergency situation where the batteries that power the "B" Emergency Feedwater equipment would fail at the same time as offsite power would be lost and a loss of coolant accident occurred. The Company investigated the

possibility that this might result in an excessive flow of feedwater. The Company tested this situation with the use of a training simulator and concluded that the results were acceptable.

# Q. DID THE COMPANY CONSIDER INSTALLING CAVITATING VENTURIS TO PREVENT PUMP CAVITATION PRIOR TO THE CURRENT OUTAGE?

A. Yes, it did both for the High Pressure Injection system and the Emergency Feedwater system. The Company sought to avoid resorting to this modification because of the difficulties that it posed. A cavitating venturi is a device that limits the flow of, for example, feedwater through the pipes leaving the Emergency Feedwater pumps. To oversimplify the matter, it is like installing a washer with a small opening inside a pipe, forcing the water to stream through the smaller opening. The water flows through the opening, reaching sonic velocity, and the pressure created by this action slows the movement of the water through the opening.

In order to install cavitating venturis, the pipes must be cut and the devices welded into the pipes. The material must be x-rayed after every pass, and any imperfection must be ground out and the welding repaired. It is possible that it will be necessary to repeat the procedure with a new length of pipe if repeated repairs are made in the original pipe. In short, the modification is complex and requires an extended outage to complete.

In addition, Florida Power was aware in the late 1980's that Arkansas Power & Light had installed cavitating venturis in the High Pressure Injection system of its nuclear unit ("ANO-1"), which, like CR-3, had been designed in part by Babcock & Wilcox. The venturis created

excessive vibration, resulting in secondary damage to the pipe supports.

As a result, Arkansas Power had to modify the devices.

Similarly, in 1989, Duke Power considered installing cavitating venturis to prevent cavitation in the Emergency Feedwater pumps at its Oconee nuclear units. After designing, manufacturing, and installing these devices in a test loop, Duke Power became concerned that cavitating venturis would create excessive vibration in the Emergency Feedwater configuration at the Oconee units, which might damage other equipment. Accordingly, Duke Power abandoned its plans to install hardware modifications to deal with the cavitation concern. Instead, like Florida Power, Duke Power sought to cope with this concern by means of operator training and procedures. See PFM Ex. 4 (Duke Power correspondence).

Against this background, Florid\* Power sought to address concerns about cavitation by making control system and electrical modifications to its Emergency Feedwater system and by emphasizing operator training and procedures. At the time, this appeared to be a more controllable, proven, and cost-effective solution to the problem in the context of the system configuration that existed at CR-3.

# E. THE 1996 REFUELING OUTAGE

- Q. DID FLORIDA POWER MODIFY ITS ENGINEERED SAFEGUARDS SYSTEM DURING THE 1996 REFUELING OUTAGE?
- A. Yes. At that time, the Company determined that it was necessary to disconnect the ASV-204 valve that controlled the flow of steam into the

"B" Emergency Feedwater pump turbine from the "A" Emergency Diesel Generator in order to avoid pump cavitation in certain emergency circumstances. This had the effect of "reversing" the modification that the Company had made in 1987, when it elected to power the "B" ASV-204 valve by means of the "A" Emergency Diesel Generator to reduce flow through the "A" Emergency Feedwater pump and thereby to reduce loading on the "A" Emergency Diesel Generator.

### Q. WHAT LED THE COMPANY TO MAKE THIS MODIFICATION?

A. As part of the ongoing process of monitoring its systems, the Company began focusing in 1994 on the accuracy of plant instrumentation. With the benefit of more sophisticated computers and analytical tools, the Company came to question calculations that had relied on existing instrumentation. The Company modified its calculations to assume a greater margin for error than it previously assumed.

Our engineers determined in 1996 that the kilowatt meters that were used by operators in performing load management actions showed uncertainties at load levels over 200 kW. So the Company took steps to install more accurate components in the Emergency Diesel Generator kilowatt meter indication loops beginning March 1996. In connection with this modification, plant personnel were required to consider the interrelationship of this equipment with other features of the Engineered Safeguard system. In the course of doing this work, our engineers examined the then-existing engineering judgment (arising out of the modification we performed in 1987) that load would be reduced by the

concurrent operation of the "A" Emergency Feedwater pump (which was powered by electricity) and the "B" Emergency Feedwater pump (powered by steam).

In re-analyzing this assumption, plant personnel considered the possibility that flow control for the "B" Emergency Feedwater pump might not be available to provide controlled back-up to the "A" Emergency Feedwater pump if a failure occurred in the batteries used to power valves on equipment on the "B" side of the Engineered Safeguards system. The valves that control the flow of feedwater through the "B" Emergency Feedwater pump are normally open and require electric power to close. If the batteries used to power those valves were to fail, the "B" pump would operate only at its maximum capacity. This would afford plant operators less control over the operations of the "B" Emergency Feedwater pump in a Small Break Loss of Coolant Accident.

In investigating this situation further, our engineers became concerned that the flow of feedwater through the Emergency Feedwater pumps in the circumstances just described might result in the loss of Net Positive Suction Head, which can lead to cavitation, the condition that I have previously described. The Company conducted detailed calculations in 1996 -- which factored in more conservative assumptions based on our knowledge then of instrument error -- which indicated that this risk might well materialize in certain hypothetical emergency situations.

To address this issue, CR-3 engineers from Operations, Licensing, Electrical and Mechanical Design Engineering, and Emergency Operating Procedures considered the option of modifying the Engineered Safeguards

Feedwater pump whenever the "A" pump was initiated, thus reversing the 1987 modification. Although the 1987 modification had been implemented to reduce load on the Emergency Diesel Generators, the generators were upgraded in 1390 to increase their ratings, and we had obtained more accurate information about their capability from Coltec in the intervening years. Based on this information, our engineers concluded that we could safely reverse the 1987 modification.

CR-3 personnel were aware that the Emergency Diesel Generators had been assigned ratings by Coltec indicating that the diesels were made to operate continuously at a maximum of 3500 kW for 30 minutes. CR-3 personnel were further aware that calculations showed that the "A" Emergency Diesel Generator would spike up to 3700 kW for up to a few seconds if the "A" Emergency Fec Jwater pump were assumed to run without back-up from the "B" pump during a hypothetical Small Break Loss of Coolant Accident. CR-3 engineers were able to arrive at this determination because the Company had only recently acquired the ability to calculate loads in small temporal increments. Previous calculations had averaged loads over longer periods of time and lacked the precision to detect such transient spikes.

The Electrical Design Engineering Department contacted Coltec to confirm that the generators could in fact handle this load. Coltec assured the Company that this was the case. See PFM Ex. 5 (correspondence from Coltec). Based on this information, the Electrical Design Supervisor approved the modification reversing the 1987 modification. The

modification was completed in May 1996. See PFM Ex. 6 (consisting of MAR documentation on this modification.)

The concern that led to our making the modification arose approximately two months into the February 1996 refueling outage. Had the Company not developed an adequate solution at the time, the Company would have had to keep the plant shut down until one could be developed. This is so because, based on the Company's then most recent calculations, CR-3 would fail to meet the Technical Specifications for operable Emergency Feedwater pumps and therefore Florida Power would be out of compliance with the technical requirements of its license. As a result of the solution described, the Company was able to restart the plant on May 17, 1996.

- Q. BASED ON ALL THE INFORMATION AVAILABLE TO THE COMPANY BY
  THE BEGINNING OF 1996, DID MAPIAGEMENT BELIEVE THAT IT HAD
  TAKEN REASONABLE AND EFFECTIVE STEPS TO MEET ALL
  REGULATORY REQUIREMENTS INVOLVING ITS ENGINEERED
  SAFEGUARDS SYSTEM?
- A. Yes. As I have described, the Company made a number of modifications to this system over the years that appeared fully effective in meeting the applicable safety requirements.

### V. THE CAUSE OF THE CURRENT OUTAGE

### A. THE RUPTURED LUBE OIL PIPE

### Q. WHAT PRECIPITATED THE CURRENT OUTAGE?

A. On September 2, 1996, a lube oil pipe in the main turbine ruptured. Plant operators detected a loss of lube oil pressure in the main turbine on August 30, 1996, which caused an automatic start of the electric back-up bearing oil pump. (This system is used to lubricate the bearings on the main turbine.) CR-3 personnel commenced an immediate investigation of the problem and contacted the system vendor, Westinghouse, for guidance. Westinghouse indicated that a valve was partially blocked and that CR-3 could be operated while our investigation continued. We took steps to adjust the valve to correct the problem.

Plant operators monitored the lube oil pressure, standing ready to shut down the plant if oil pressure dropped to a specified level. Oil pressure continued to fall. On September 2, plant operators detected a drop in the main turbine lube oil reservoir level of about 400 to 600 gallons over the prior 24 hour period. Our investigating engineers determined that there was significant foaming of the oil within the reservoir. Based upon this problem and the continued loss of lube oil pressure, we decided to decrease reactor power and to place the turbine on turning gear. By 9:00 pm, September 2, we took CR-3 off line.

On September 3, our engineers opened several lube oil tank access ports and detected a long pipe crack and oil spewing inside the tank. Confronted with this problem, we continued to cool down the plant

because the necessary repair work would require the shut down of the turbine and the breaking of the condenser vacuum.

Upon further inspection of the system, we identified a four and a half foot crack in a ten foot long pipe just inside the top of the tank. In addition, the flange bolts in the downstream end of this pipe had loosened, permitting much of the gasket to blow out. The crack and the condition of the gasket allowed lube oil to leak out of the pipe, explaining the loss of pressure.

Our engineers also determined that a pipe support was damaged, another was missing, and a third one had been previously repaired. The pipe was subject to vibration in normal operation, placing stress on these three-inch pipe supports. The deterioration of the pipe supports resulted in still greater vibration, which loosened the flange bolts. An offsite metallurgical laboratory detected a high number of inclusions (or malformaties) in the failed pipe section, which made the pipe susceptible to fracture. The vibration combined with these inclusions caused the pipe to break.

- Q. BASED ON THE INFORMATION AVAILABLE TO THE COMPANY PRIOR TO
  THE RUPTURE OF THIS PIPE, DID THE COMPANY ANTICIPATE THAT
  THIS MIGHT OCCUR?
- A. No. The pipe had been in use since the plant's inception, and we had not experienced any problem like this before. The pipe was naturally subject to vibration during the normal operation of the plant, for which the pipe and the pipe supports had been designed. Although our engineers had

made occasional repairs to the pipe support structures during outages conducted for unrelated reasons, these repairs fell into the category of routine maintenance on account of the normal wear and tear on the plant, and there was no indication that the pipe itself had ever suffered or would suffer any structural impairment. We were unaware, of course, of the inclusions in the prefabricated pipc material. During operation of the plant, the pipe is not observable. We were unaware of the loosening of the flange bolts. Finally, to our knowledge, there have been no industry advice letters or similar failures at other nuclear units.

### Q. WHAT STEPS DID THE COMPANY TAKE TO REPAIR THE PIPE?

A. After shutting the plant down, we continued our investigation of the problem and started repair work. By September 7, we had removed the tank manway and inspected supports and hangers. We had to hand wash the tank so that welding could be perf rmed. By September 9, we had received a replacement pipe section, and by September 11 it was bolted in place. New hangers and supports were fabricated as needed. By September 14, we had completed the repairs, cleaned the tank, and refilled it with oil. The lube oil system was restored to service by September 14. In the normal course, we would have been able to return CR-3 to service in approximately a week from that date, in order to allow for final inspections and verifications and the restart of the unit.

A. In the process of ongoing analysis of the diesel loading issues and the Emergency Feedwater system, and with oversight by the NRC, the Company determined that the modification that it had made during the February 1996 refueling outage would not be sufficient to ensure compliance with the plant's operating license.

Specifically, the May 1996 modification gave rise to several Unreviewed Safety Questions that CR-3 personnel did not recognize at the time of the modification, but that were identified after considerable analysis and discussion with the NRC. These Unreviewed Safety Questions arose from the fact that the modification led to a situation where the Emergency Diesel Generators might exceed the plant's Technical Specifications in certain hypothetical emergency situations, and where the Emergency Feedwater pumps might not be available when needed to deal with a Small Break Loss of Coolant Accident.

The Company has now determined that it must address these concerns by completing a more extensive upgrade of its Emergency Diesel Generators and that it must install cavitating venturis in its Emergency Feedwater system. Facing the necessity of these changes, the Company is taking the opportunity of this outage to complete other modifications that will ensure that the Company is able to maintain necessary safety margins in the future.

### VI. REASONABLENESS OF COMPANY'S ACTIONS

- Q. AT THIS TIME, IT APPEARS THAT EXTENSIVE MODIFICATIONS MUST BE MADE TO RESTORE THE COMPANY'S ENGINEERED SAFEGUARDS SYSTEM TO FULL COMPLIANCE WITH LICENSING REQUIREMENTS. WHY DIDN'T THE COMPANY MAKE THESE MODIFICATIONS SOONER?
- A. As I have explained, management of CR-3 believed that the modifications that we made over the years were a prudent and effective means to address all applicable safety requirements. We felt that it would have been unwarranted in the context of our particular plant to make more extensive modifications sooner. It appeared that there were other reasonable and effective alternatives that would enable the Company to avoid the capital expenditures and extended outages associated with the more extensive modifications that the Company is making today.
- Q. WHY DIDN'T FLORIDA POWER F MULATE OTHER NUCLEAR PLANTS
  THAT MADE MODIFICATIONS IN THE PAST SIMILAR TO THOSE
  FLORIDA POWER IS MAKING TODAY?
- A. Although various nuclear plants may be similar, each one is different, and each plant must adopt strategies that provide appropriate solutions for that plant. Even among B&W plants, there are significant design differences, and the differences have been exaggerated by various modifications that each has made over the years. For example, the Oconee nuclear plant was built with no Emergency Diesel Generators. Three Mile Island has two very small electric-powered Emergency Feedwater pumps, as distinguished from one large electric-powered.

Emergency Feedwater pump at CR-3 that imposes a lot of load; and Davis Besse has only steam-driven Emergency Feedwater pumps.

Florida Power has pursued strategies over the years that appeared to provide a cost-effective means of meeting all safety requirements without imposing undue costs on the ratepayers. In addition, as I have described, in the past various facilities were encountering drawbacks associated with certain major modifications, and we were reluctant to assume the risk of those modifications.

- Q. WILL THE COMPANY BE ABLE TO BENEFIT FROM ITS OWN EXPERIENCE
  AND THE EXPERIENCE OF OTHERS IN MAKING THE CURRENT
  MODIFICATIONS?
- A. Yes. Had the Company made these modifications sooner, it would not have had the benefit of the experience gained from all the previous efforts to address these issues that I have described. This experience has provided a much more complete understanding of the system and equipment at CR-3 than the Company had in the last decade, for example. This should enable the Company not only to make the modifications efficiently but to make better modifications. No engineer is clairvoyant or has complete knowledge of what the future will bring. But the Company has significant experience now in operating CR-3 and is well situated to make the current modifications in an effective and efficient manner. The same holds true of the experience the Company has gained from efforts by other plants to make the same or similar modifications.

- Q. IF THE COMPANY HAD UNDERTAKEN TO MAKE THE SAME MODIFICATIONS SOONER, WOULD IT HAVE BEEN NECESSARY TO HAVE THE SAME KIND OF OUTAGE AS THE CURRENT OUTAGE TO ACCOMPLISH THESE MODIFICATIONS?
- A. Yes. It is important to understand that, based on what we now know, the Company has been able to determine that the plant currently is incapable of satisfying the requirement under its license that it be able to respond to a hypothetical emergency situation that may occur once in 11.6 billion years (with resulting damage to the core occurring once in over a trillion years). Although this is an extremely remote statistical risk, it is one that has very immediate regulatory consequences, namely the Company must keep the plant out of service until the problem is fixed. See PFM Ex. 7 (Technical Specifications limiting conditions).

If we are supposing that the Com, any would have recognized the need to make these extensive modifications sooner, in fairness we must also assume that the Company would have known why these modifications were required. But if the Company had recognized in the past what it came to recognize in September 1996, it would have found itself in the same place. That is, it would have faced the necessity of taking or keeping the plant out of service until this deficiency in its Engineered Safeguards system could be rectified. The exigency of the modifications then, as now, would preclude advance planning.

Florida Power's history of modification experience demonstrates that there are no reasonable alternatives to making the extensive modifications

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now underway. The Company implemented a series of modifications over a period of seventeen years that were reasonable, technologically feasible alternatives designed to enable the Company to avoid the extensive costs associated with the current outage. Again, if we are supposing that the Company would have recognized at any time in the past what it now knows, the Company would have simply embarked in the past to make the same extensive modifications.

In addition, there is no reason to suppose that the Company should have recognized the need to make these modifications on the verge of entering any other outage, such as a regularly scheduled fuel outage. One might just as easily suppose that the recognition might have occurred while the plant was in full operation. In any case, based on my knowledge of CR-3's past outages, I am able to state that the Company could not have accommodated the kind of modifications we are undertaking at this time within the umbrella of any past outage. The Company was fully occupied dealing with other exigencies during each past outage. The most reasonable conclusion to draw from all the facts and circumstances is that had the Company arrived earlier at the same conclusions reached in September 1996, the result would have been an outage at least as long as the current one. Indeed, had we attempted to implement the current modifications before CR-3's electronic circuitry was upgraded in the 1985 (with the installation of the Emergency Feedwater Initiation and Control system that I have described), the modifications would have been harder to implement.

# Q. IS THE COMPANY INCURRING ALTERNATIVE FUEL COSTS AS A RESULT OF THIS OUTAGE?

A. Yes.

### Q. IS IT REASONABLY NECESSARY TO INCUR THESE COSTS?

A. Yes. The Company had to enter into an extended shutdown in order to make the necessary modifications. These modifications could not be made while the plant is in service. They include extensive upgrades to the Emergency Diesel Generators to increase their capacity by 150 kW and the dismantling of the Emergency Feedwater System in order to add cavitating venturis that will regulate the flow of feedwater from the Emergency Feedwater pumps.

As noted, these modifications are not discretionary. The Company must make these modifications in order to restore compliance with CR-3's license.

Finally, as I have described, the Company has no alternative means to satisfy the requirements of its license other than by making these extensive modifications. The Company has made every reasonable attempt over the past seventeen years to meet applicable safety requirements by means of less extensive modifications that could be made and have been made with minimal downtime. The Company has exhausted these options and has no alternative at this time other than to keep CR-3 out of service for an extended period of time in order to make the current modifications.

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# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

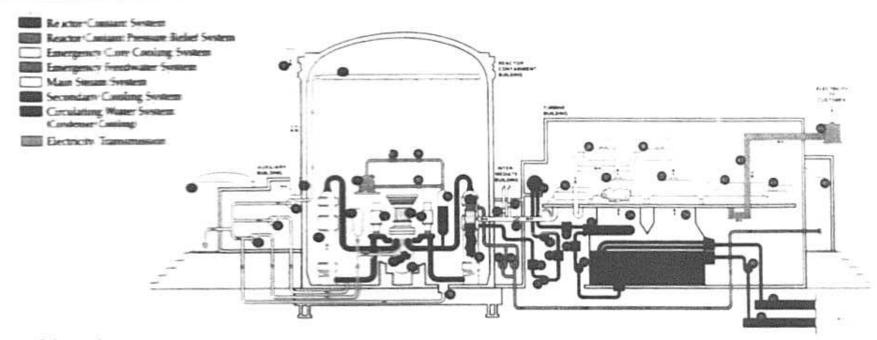
**DOCKET No. 970261-EI** 

In Re: Review of Nuclear Outage at Florida Power Corporation's Crystal River Unit No. 3

PAUL F. McKEE

# EXHIBITS TO THE TESTIMONY OF PAUL F. MCKEE

EXHIBIT NO. \_\_ (PFM-1)
BASIC SCHEMATIC DIAGRAM OF CR-3



### Schematic

- 1. Borated Water Stomage Tank
- 2. Low Pressure Injection Pumps (2) 3. High Pressure Imeritor Pumps (3)
- 4. Reactor Building Spray Pumps (2)
- 5. Reactor Building Printe Valve
- 6. Reactor Building & Autobary Building Vent
- 7. Reactor Building Serray Headers C.
- 8. Place Operated Retire Valve
- 9. Pressurged Blanck Water
- 10. Pressurged Sanety Walve C
- 11. Reactor Consum: Dynam Taris.

- 12. Steam Generator
- 13. Core Flood Tanks (2)
- 14. Reactor Coolant Pumps (4) Control Rods
- 16. Reactor Core
- 17. Reactor Vesser
- 18. Reactor Building Sump
- 19. Pressurizer
- 20. Atmospheric Dume Valves (2)
- 21. Main Steam Satery Valves (16) 22. Main Steam Isolation Valves (4)
- 23. Motor Driven Emergency Feed Pump

- 24. Turbine Driven Emergency Feed Pump
- 25. Main Feedwater Pumps (2)
- 26. Feedwater Heaters (2)
- 27. Feedwater Heaters (2)
- 28. Condensate Pumps (2)
- 29. Demineralizers (6)
- 30. Feedwater Booster Pumps (2)
- 31. Condensate Heaters (2)
- 32. Condensate Heaters (4)
- 33. Main Steam Lines (4)
- 34. Deacrator.
- 35. High Pressure Turbine

- 36. Moisture Separator Reheaters (4)
- 37. Low Pressure Turbines (2)
- 38. Condensers (2)
- 39. Intake Canal
- 40. Discharge Canal
- 41. Circulating Water Pumps (4)
- 42. Electric Cemerator
- 43. Electricity Transmission Lines
- 44. Exciter
- 45. Emergency Feedwater Tank
- 46. Transformers (3)

# EXHIBITS TO THE TESTIMONY OF PAUL F. MCKEE

EXHIBIT No. \_\_ (PFM-2)
MAR DOCUMENTATION FOR 1987 MODIFICATION

		MATLE	- Contraction of the Contraction	
MOD.	FICATION A	PPROVAL River Unit 3	RECORD	
NAX T87-10-09-01	94907	E Top	: to	'm 1 '1
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See Attached \$1	sour 10 F 1 ft - 17 Sofiets (80 of-	lide n		
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## ANALYSIS / CALCULATION Crystal River Unit 3

SHEET 1 OF :

BELIFISHAR BO.

MAR TS7-10-09-01

Dogs

OCTOBER 28, 1987

Propost :

ASV-5/204 POWER SEPARATION

## ATTACHMENT TO MODIFICATION APPROVAL RECORD

## DESCRIPTION OF PROPOSED MODIFICATION

Electrically separate Motor Operated Valve ASV-204 from ASV-5 and assign a new power source for ASV-204 from the 250/125 Vdc ES 'A' power system. Install separate remote manual control and automatic EFIC interlocks for ASV-204.

### REASON FOR MODIFICATION

Presently, ASV-204 and ASV-5 are electrically connected in parallel and powered from a common 250/125 Vdc ES 'R' power source, and operate via common manual and sutomatic control interlocks. ASV-204 is being repowered from a 250/125 Vdc ES 'A' power source and provided with separate controls in order to enable the Turbine Driven EFW Pump (EFF-2) to be operable with a failure of the 250/125 Vdc ES 'B' power system. With this capability, EFF-2 will be available to share the EFW flow requirements with the motor driven EFW pump and, thus, decrease the load on Emergency Diesel Generator EDG-1A for scenarios requiring EFW coincident with loss-of-offsite-power and failure of the 'B' power system.

### MAR NO. TE7- 10. 09 - 01

SAFETY EVALUATIONS Arguer the following questions and provide specific hestileation (and attachment if necessary).

Is the probability of an occurrence or the consequence of an accident or malbucuon of equipment important to talety as previously evaluated in the Final Salety Analysis Report, INCREASED?

YES NO X

Because:

\*\*Technology\*\*

\*\*Techno

See Attached Sheet

2. Is the possibility for an accident or malfunction of a different type than any previously evaluated in the Final Safety Analysis Report, CREATED? YES NO X Because:

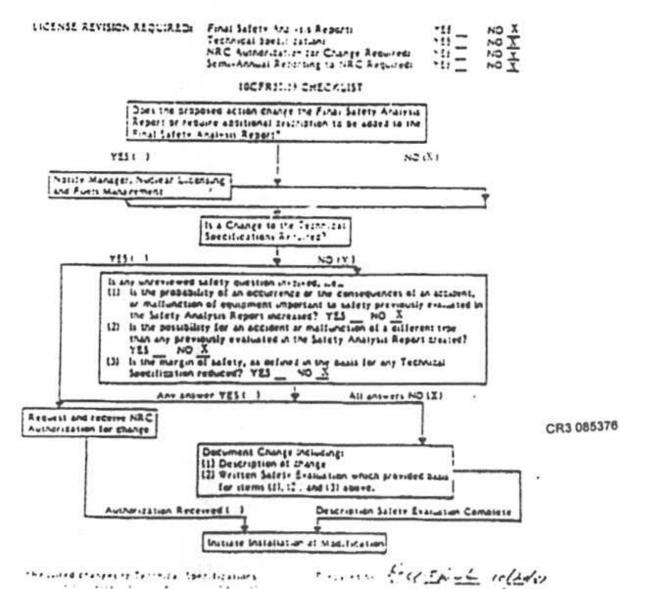
See Attached Sheet

Is the margin of safety, as defined in the basis for any Technical Specification.

REDUCED? YES NO X

Because:

See Attached Sheet





## ANALYSIS / CALCULATION Crystal River Unit 3

SHEET TOF 3

REI/MAR No.

MAR T87-10-09-01

Date

OCTOBER 19, 1987

Project :

ASV-5/204 POWER SEPARATION

### ATTACHMENT TO MODIFICATION SAPETY EVALUATION

- ASV-5 and ASV-204 are motor operated valves having identical functions of 1. supplying steam to the turbine driven Emergency Feedwater Pump (EFP-1). Since ETP-2 is the ES "B" channel pump, ASV-5 and 204 were electrically connected in parallel to a common 250/125 VDC ES "B" channel power and control source. This modification electrically separates ASV-204 from ASV-5 and repowers ASV-204 from 150/125 VDC ES "A" channel power. Also, separate control room controls and separate "A" channel EFIC interlocks are being privided for ASV-204. Automatic control logic of ASV-204 has not changed. Therefore, the probability of an occurance or the consequences of an accident or matfunction of ecuipment important to safety as previously evaluated in the FSAR is not increased since the logic of automatically opening ASV-234 whenever the EFIC System calls for emergency feedwater has not been bitered. The reliability of EFF-? has actually been increased because with this modification e ther "A" or "B" train power will control and operate one of the steam injet . sives to EFP-2 as opposed to both valves being "B" train powered. FSAR Sections 7.2.4, 8.7.2.6 and 10.2.1.6 have been reviewed.
- The electrical separation of ASV-104 from ASV-5 does not impact the design function of either valve to supply steam to the EFP-2 turbine. Power and control for ASV-5 is not affected by this modification and ASV-5 retains its automatic control logic, remote manual control, local manual control and remote shutdown isolation and control. ASV-204 is being powered from the redundant power channel, and will be provided with its own remote manual control and with separate EFIC interlocks for automatic operation. The type of remote manual control and automatic operation of ASV-204 is the same as for ASV-5. Therefore, based on the above, the possibility for an accident or malfunction of a different type than any previously evaluated in the FSAR is not created. FSAR Sections 7.2.4, 5.2.2.5, and 10.2.1.6 have been reviewed.

CR3 085377

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## ANALYSIS/CALCULATION Crystal River Unit 3

SHEET \_3 OF \_1

BET/MAR No.

MAR T87-10-09-01

Dete

OCTOBER 19, 1987

Project :

ASY-5/204 POWER SEPARATION

J. This modification enables the turbine driven Emergency Feedwater Pump (which is the "B" channel pump) to be operational even if a failure should occur on the "B" channel power system for which shutdown operation would be via the "A" channel systems. With this capability, the turbine driven EFW pump is able to operate and share the EFW requirements with the "A" channel motor driven EFW pump. This will reduce the electrical load on the "A" channel diesel generator for the condition of an ES actuation coincident with a loss-of-offsite-power and failure of the "B" channel power system. Consequently, with this modification the margin of safety, as defined in the basis for any Technical Specification, is not reduced. It is actually enhanced because of the increased availability of the turbine driven Emergency Feedwater Pump. Technical Specification Sections 3/4.7.1 and 3/4.8.1 have been reviewed.

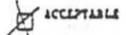
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# SAFET ROLLSTON RETURN

70: Suclear Technical Specification Coordinator

topy of MAR T37-15-C9-C/ PCS \_\_\_\_\_\_\_ is attached for your teview of the MAR Safety Evaluation for Technical Specification Conference and Onserviewed Safety Esplications.



ח משממשושע

leturn tenediately to the Muclear Additiontion Supervisor for restition

COMMENTS.

11/16/87

W. Marshell



# REGULATORY/ENVIRONMENTAL REVIEW Crystal River Unit 3

**SOURCEST MANAGOR** 

# MAR T87-10-09-01

MET, MUCLEAR OPERATIONS DEPORTMENT PROCEDURE: MOS-11

1. 1	10 CFR	50 54	Reviews

Does this modification or document revision change what is described in any of the following plans/programs? If unable to determine, contact responsible person designated below.

Contact: Director, Quality Programs	☐ Yes	E No
Litensed Operator Requalification Program (FSAR Section 12.2.3.4 and Appendix 12 C) Contact: Manager, Nuclear Operations Training	O'Yes	Q No
Mccified Amended Security Plan Contact: Manager, Nuclear Licensing	2 Yes	2 No
Satequards Contingency Plan Contact: Nuc. Security & Special Project Superintendent	= Yes	Z'No
Security Guard Training and Qualification Han Contact: Nuc. Security & Special Project Superintendent	⊒ Yes	3'NO
Radiological Emergency Response Plan Contact: Manager, Site Nuclear Services	= Yes	± NO

### If any are "yes":

- Contact appropriate responsible person contified above to

  perform the evaluation and attach. The evaluation must be appropriate by the Oversion mead responsible for the plansfogram. 

  Complete Z'N/A
- D. N°C approval received if needed and attach. I Complete I N/A
- 2. Environmental Protection Plan Review

Could this change affect the environment in a hon-radiological way? 

These way is the service of the service o

 Review for change to Radioactive Waste System (10 CFR 50.34s and Appendix I / T. S. 6.16.1.1)

Will this shange to a radioactive waste system (liquid, gaseous or solid) result in an increase of radioactive material released to the environment?

T Yes W No

If "yes", submit change to Manager, Nuclear Licensing to evaluate the reporting requirements.

C Submitted E NIA

IF ALL OF ABOVE ARE CHECKED NO. NO FURTHER REVIEWS ARE REQUIRED.

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# SHALITY SYSTEMS SOCIMENT EVALUATION

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RELATED DOC	UNERTS:			
GA REVIEW:	,			
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CR3 085381



Sheet 1 of 17

MAR/REI NO.

T87-10-09-01

Date

10/24/87

Project :

ASV-5/204 Power Separation "

### A. SUMMARY FUNCTIONAL DESCRIPTION

This modification electrically separates the turbine driven emergency feedwater pump steam inlet isolation valves ASV-5 and ASV-204 in that ASV-204 is being powered from the 250/125 YDC ESA power system. ASV-5 will remain powered from the 250/125 VDC ESB power system. ASV-204 will become an ES channel 'A' valve and will have its own control switch and position indicator lights on the PSA/EFIC section of the main control board. The control circuit for ASV-204 will also be provided with contacts from the EFIC 'A' channel logic for automatic operation. Auxiliary relays will be added to the control circuitry in order to provide alarm logic for slarms which are common to ASV-3 and ASV-204.

This modification will enable the turbine-driven emergency feedwater pump to be operable in the event of failure of the 250/125 VDC ESB power system.

### U. ATTACHMENTS

- 1. Project Assignment Memo
- 2. Design Data Sheets (4)
- 3. Design Input Record Gan Zear Data Fr. 117451
- 3a. Sufiz Clanification for an form with attentant shatters and page 1.15.
- 4. Verification Report
- Th. GRE Dos 4- Vov 5 ... > [ .... 1/2]
- 5. Fire Protection Review of jarantari places.
- 6. Modification Safety Evaluation ... + 11-+ 3 2-2 -F 3
- 7. Regulatory Environmental Review
- 8. Drawings:

Sketch 1 - Electrical Block Diagram

Sketch I - Electrical Conduit Layout, Intermediate Bidg. EL. 95-0

Sketch 3 - Electrical Conduit Layout, Intermediate Bidg. EL. 119-0

DO. RKowle 10/28/07 Photology 10/30/07 Photology 10/10/27



Sheet 1 of 17

MAR/EST No.

T87-10-09-01

Dete

10/24/87

Project :

ASV-5/204 Power Separation

Sketch 4 - Electrical Conduit Layout, Complex E 108

Sketch 5 - Electrical Conduit Layout, Control Complex EL. 124-0

Sketch 6 - Electrical Conduit Layout, Control Complex EL 134-0

Sketch 7 - Electrical Interconnection Wiring Diagram, ASV-5

Sketch 8 - Electrical Interconnection Wiring Diagram, Motor Starter for

Sketch 9 - Electrical Interconnection Wiring Diagram, TB-A5-9

Sketch 10 - Electrical Interconnection Wiring Diagram, Motor Starter for

Sketch 11 - Electrical Interconnection Wiring D:15ram, ASY-204

Sketch 12 - Electrical Interconnection Wiring Diagram, TB-AS-01

Sketch 13 - Electrical Arrangement, DPDP-SA

Sketch 14 - Electrical Arrangement, ACDP-\$4

Sketch 15 - Electrical Arrangement, E.S. Aux. Relay Rack Assy. RR3A

Sketch 16 - Electrical Aux. Relay Rack JA Internal Wiring

Sketch 17 - Electrical Aux. Relay Rack JA Internal Wiring

Sketch 18 - Electrical Aux. Relay Rack JA Terminal Boards

Sketch 19 - Electrical Aux. Relay Rack JA Terminal Boards

Sketch 20 - Electrical Aux. Relay Rack RR5B1 Terminal Boards

Sketch 21 - Electrical Main Control Board Primary and Secondary Auxiliary
Assembly

Sketch 22 - Escutcheon Plate Detail

Dougn ingrees Dots very producted 10/30/67 Hade to fev 10/2/27



Sheet 3 of 17

MAR/REIRO Dete TE7-10-09-01 10/24/87 Propert : ASV-5/204 Power Separation Sketch 23 - Electrical Main Centrol Board PSA/EFIC Internal Wiring SECTION 284 - ELECTE IN MAN CONTOL GOARD PAI ETE INTERRELINEING CBO + 17 Sketch 24 - Electrical Main Control Board Primary and Secondary Aux. & - July Terminal Boards Skatch 35 - Electrical Main Control Doore 75A/EFIC Internal Wising Sketch 26 - Electrical Main Control Baore Primary and Secondary Aux. HUC 11/11/27 Terminal Boards Sketch 27 - Electrical Elementary Wiring Diagram, ASV-204 Sketch 28 - Electrical Elementary Wiring Diagram, ASV-204 Sketch 29 - Electrical Elementary Wiring Diagram, ASV-204 Sketch 30 - Electrical Elementary Wiring Diagram, ASV-5 Sketch 31 - Electrical Elementary Wiring Diagram, ASV-5 Sketch 32 - Electrical Elementary Wiring Diagram, ASV-5 Sketch 33 - Electrical Elementary Wiring Diagram, ASV-5 Sketch 34 - Electrical Elementary Wiring Diagram, EFIC Matrix 'A' Control and EFW Actuation A Sketch 35 - Electrical Elementary Wiring Diagram, EFIC Matrix 'A' Control and EFW Actuation 'A' Sketch 36 - Electrical Elementary Wiring Diagram, EFIC Matrix 'A' Control and EFW Actuation 'A' E/I Sketch 'A' - Demolition Dwg., Intermediate Bldg. EL. 95-0 Bill of Material #1. Revision 0 Analysis Calculations DC-3510-126.0-EZ, Rev. 0

Design Empress	10/24/27	Direll	12/3/87	Kacler	EL CEV	ريا : إلما
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Sheet 4 of 17

MAR/REI No. 10/74/87

Project :

ASV-\$/204 Power Separation

- b. DC-CR3-017-EE, pages 1, 2, 24, 29, 31, 32, 33, 34 and 40, all Rev. 1
- c. DC-5510-126.1-EE, Rev. 0
- 11. Cable Pulling, Termination and Test Data Sheets for the following circuits:

ASE 27	ASE JO	ASE 34	ASE 37	ASK 1
ASE 28	ASE 31	ASE 35	ASF 31	ASK 29
ASE 29	A5E 33	ASE 36	ASF 32	ASK 30

12. ALARA Analysis/Calculation Sheet

### C. REFERENCES

- FCS-8915 dated 10/12/87
- Telecon D. A. Rhoads/M. U. Rahman dated 10/15/87.
- J. Telecon K. Shirk/l. R. Pressley dated 10/22/87
- 4. Emergency Diesel Generator Loading Evaluation Report dated 10/23/87

#### D. MATERIALS

See attached Bill of Material number 1.

#### E. INSTALLATION INSTRUCTIONS

- Charge all time and materials to Work Request \$94907 for installation and to Work Request \$94708 for removal.
- All cable pulling, termination, splicing, and conduit installation shall be in accordance with applicable FPC maintenance procedures.
- 3. Conduit Installation at ASV-204.
  - "a. Install the following aluminum conduits safeguards 'A' Red per Sketch No. 2 and detailed conduit routing sketches.

ASE 34 - 2" ASE 33 - 1" ASE 36 - 2"

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Sheet 5 of 17

MAR/REING. Date T87-10-09-01 10/24/87 Project :

ASV-5/204 Power Separation

install the following aluminum conduit non-safeguards 'X" White per Sketch Nos. 2 and 3 and detailed conduit routing sketches.

#### ASF 32 - 1"

- Conduit Installation at DPDP-SA.
  - \*a. Install the following aluminum conduit safeguards 'A' Red per Sketch No. 4 and detailed conduit routing sketches-

#### ASE 14-2"

- 5. Condult Installation at RR3A and RR5B1.
  - install the following aluminum conduit non-safeguards 'X' White per Sketch No. 5 and detailed condult routing sketches.

#### ASK 30-3/4"

- Conduit installation at floor opening 5:A to Main Control Board 6. Section PSA.
  - a. Install the following aluminum conduit safeguards 'A' Red per Sketch No. 6 and detailed conduit routing sketches.

### ASE 36-2"

Detailed conduit routing sketches to be issued per \*Notes subsequent FCNs to this MAR.

- instructions for MOV ASV-5. 7.
  - Determinate circuit ASK1 as follows and as indicated on Sketch No. 7.

Wire Color/Wire Mark	Terminal
Black (1)/100AL	13A
White(2)/100AL1 Shield /	Floating

	Design Engineer	Mades	W Thuff	10/3/07	Ti Qool	L EDV	whit?
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Sheet 6 of 17

MAR/REIRG. .... Dete 10/24/87 TE7-10-09-01 Project : ASV-5/204 Power Separation Retag wires in ASY-5 as follows: Wire Color/Wire Mark To Wire Mark CKT 100 AL2 Red (3)/100 AL1 EFK42 100 ALI Green (4)/100 AL Pull cable out of conduit ASK1-3/4" to cable tray \$302. Pull cable back (east) in tray #302 to conduit ASEJE-2" and coll in tray to be re-routed in E/I Step 8. Pull the following cables as indicated on the applicable cable pulling data 8. sheetsi ASK 1 (Pulled back in Tray 302) ASE 34 ASE 35 ASF 32 ASE 36 ASE 37 ASE 11 **ASK 29** ASK 30 Wiring instructions for Motor Starter for MOV ASV-5, Sketch No. 10: 9. Open breaker #20 in ACDP-12 Pull fuse #5 in DPDP-88 5. Pull fuse #6 in DPDP-88 Determinate the following circuits (circuits to be deleted): d. Terminal Number Wire Color/Wire Mark Circuit No. 3L1 Black (1)/26 ASF 31 31.7 White (2)/27 Red (3)/Spare Cate 10/29/07 RETURN Vr. RESP; Nuc Eng 912271



Sheet 7 of 17

MAR/REI No. T87-10-09-01 Dese 10/24/27 Project :

ASV-5/204 Power Separation

Circuit No.	Wire Color/Wire Mark	Terminal Number
ASE 27	Black (1)/1 (P) White (2)/6 (N) Red (3)/7	ILI IL2 CI

- 10. Wiring Instructions for Terminal Box AS-01, Sketch No. 12.
  - Determinate the following circuit (circuit to be deleted):

Circuit No.	Wire Color/Wire Mark	Terminal Number
ASE 30	Black (1)/Spare White (2)/Spare Red (3)/8 Green (4)/7 Orange (5)/15 Blue (6)/18 White/Black (7)/20	T00-3 T88-1 T88-9 T88-10 T83-11
	Red/Black (8)/22 Green/Black (9)/36	TBB-12 TBA-7

- 11. Wiring instructions for motor starter for MOV ASV-204, Sketch No. 8.
  - Determinate the following circuits (circuits to be deleted):

Circuit No.	Wire Color/Wire Mark	Terminal Number
ASF 31	Black (1)/25 White (2)/27 Red (3)/-	3L1 3L2
ASE 27	Black (1)/1(P) White (2)/6 (N) Red (3)/7	IL1 1L2 2L1
ASZ 28	Black (1)/38 White (2)/8 Red (3)/50	C2 2L2 C4

Remove resistors R1, R2, and R3 and save to be reused later this MAR.

D. a. 1 Charles	10/29/0>	LI Thank	10/30/87	acti	ed (S)	10000
40× 1/61		11		MT:25 ** BE	7	



## Floridays ... ENGINEERING INSTRUCTIONS Crystal River Unit 3

Sheet <u>8 of 17</u>

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MAR/REI No. T87-10-09-01 10/24/87 Project : ASV-\$/204 Power Separation Terminate the following cables: Circuit No Wire Color/Wire Mark Terminal Number Black (1)/21 White (3)/22 ASF 32 "ASE 34 Black (1)/1 (P) IL1 IL2

White (3)/ 2 (N)

Black (1)/8

White (2)/9

Black (1)/8 White (2)/9 Red (3)/12 Green (4)/14 Orange (5)/Spare

\*ASE 35

ASE 33

Tape the end of the cable ASE 31 safeguard "A" Red and revise wire d. marks as follows:

From Wire Mark	To Wire Mark
24	5
25	6
23	3
33	4
28	7

- 12. Wiring instructions for terminal Box AS-9. Sketch No. 9.
  - Determinate the following circuits:

Circuit No.	Wire Color/Wire Mark	Terminal Number
ASE 29	Black (1)/7	TBA-2
	White (2)/Spare Red (3)/15	TBA-3

Design Engineer D.Q. R. fron 4	1/20/22	H. Thell	13/30/81	Hachi	at CEV	po 10 7
1 5 1 1 1 2	A. Carrier	The state of the s	COLUMN TAXABLE PARTY OF THE PAR	The state of the s	L	

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<sup>&</sup>quot; Tape end of cables safeguard 'A' Red.



Sheet 9 of 17

MAR/REIRG.

T87-10-09-01

Dete

10/24/87

Project :

ASV-5/204 Power Separation

Circuit No.	Wire Color/Wire Mark	Terminal Number
ASE 29 (cont.)	Green (4)/50	TBA-9
	Orange (5)/18	TBA-4
	Elue (6)/20	TBA-5
	White/Black (7)/22	TBA-6
	Red/Black (8)/38	TBA-8
	Green/Black (9)/36	TBA-7
(This ekt. to be	reterminated later this MA	(R)
ASE 28	Black (1)/38	TBA-8
	White (2)/8	TBA-1
	Red (3)/50	TBA-9
(This ekt. to be	deleted)	
ASE 30	Black (1)/Spare	
	White (2)/Spare	
	Red (3)/8	TBA-1
	Green (4)/?	TBA-2
	Orange (5)/15	TBA-3
	Blue (6)/18	TBA-4
	White/Black (7)/20	TBA-S
	Red/b'sck (8)/22	TBA-6
	Green/Black (9)/36	TBA-7
(This ekt to be d	seleted)	
EFK 42	Red (3)/100AL1	T88-5
	Green (4)/100AL	TBB-4
(Wires to be re-	terminated later this MAR	
EFK 43	Red (3)/100AL1	THB-S
(Wire to be rete	rminated later this MAR)	

Da. Rhade 10/2010 Delithall 10/2/87 Made to EV 10/2017

Act 141



Sheet 10 of 17

MAR/REI No. 10/24/87

Project :

ASV-5/204 Power Separation

b. Install Zener Diodes as fellows:

From Terminal	To Termina
TBA-S	TBA-12
TBA-8	TBA-10
TBA-8	TBA-11
	TBA-8

 c. Install resistors as follows (Previously removed from motor starter for ASV-204):

	From Terminal	To Terminal
RI	T8A-10	TB8-10
R2	TBA-11	TBB-11
R3	TBA-12	TBB-12

d. Install #14, AWG SIS Red jumper wire as follows:

From Terminal To Terminal
TBA-2 TBA-8

e. Terminate circuits as fc., ows:

Circuit No.	Wire Color/Wire Mark	Terminal Number
ASE 29	Black (1)/8	TBA-1
(Was	White (2)/Spare	
determinated	Red (3)/13	TBA-6
earlier	Green (4)/14	TBA-7
this MAR.)	Orange (5)/15	TBB-10
	Blue (6)/17	TBB-11
	White/Black (7)/19	TBB-12
	Red/Black (8)/12	TBA-S
	Green/Black (9)/11	TBA-4

(Tape end of cable safeguard 'A' Red)

AQ. Rank 182000 Shaff 10/3/07 Hicker 18 LEV xxxx187



Sheet 11 of 17

MAR/EEI RO. T87-10-09-01 10/24/87 Sep Project :

ASV-5/204 Power Separation

Circuit No.	Wire Color/Wire Mark	Terminal Number	
ASE 33	Black (1)/8	TBA-1	
	White (2)/9	T8A-2	
	Red (3)/12	TBA-S	
	Green (4)/14	TBA-7	
	Orange (\$)/Spare		
ASE 36	Black (1)/S	TBA-1	
	White (2)/9	TBA-Z	
	Rec (3)/13	TBA-6	
	Green (4)/10	TBA-3	
	Orange (5)/16	TBA-10	
	Blue (6)/18	TBA-11	
	White/Black (7)/20	TBA-12	
	Red/Black (8)/Spare	•••	
	Green/Black (9)/Spare	•••	
ASE 37	Black (1)/8	TBA-1	
	White (2)/11	TBA-4	
	Red (3)/13	TBA-6	
	Green (4)/10	TBA-3	
	Orange (5)/Spare	•••	
EFK 43	Red (3)/100 AL2	TBB-6	
EFK 42	Rec (3)/100 ALZ	TBB-6	
	Green (4)/100 AL1	T88-5	
ASK 1	Black (11/100 AL	TB8-4	
	White (2)/100 AL1	TBB-5	
	Shleid/	Float	

D. C. P. Ang de	182407	Hathall	10/3/87	Madei	for Fev	ا ا مواء
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Sheet 12 of 17

MAR/REING. 10/24/87

Project :

ASY-5/204 Power Separation

- 13. Wiring instructions MOV ASY-204, Sketch No. 11.
  - a. Retag the following wire marks as follows:

From Wire Mark	To Wire Mark		
11	4 (2 places)		
24	5		
25	6		
23	3		
28	7		
36	11 (2 places)		
38	12 (2 places)		
50	14		
;*	8 (2 places)		
20	17		
22	19		
15	13		
15	15		
100 AL1	100 AL2		

- b. Tape the ends of cables ASE 19 and ASE 13 safeguard 'A' Red.
- 14. Wiring instructions for DPDP-8A, Sketch No. 13.
  - a. Terminate the following circuits as follows:

Circuit No.	Wire Color/Wire Mark	Fuse Terminal		
ASE 35	Black (1)/8 (PN) White (2)/9 (N)	15-(PN) 15-(N)		
(Tape ends of	cable safeguard "A" red)			
ASE 34	Black (1)/1 (P) White (2)/2 (N)	17-(P) 17-(N)		

(Tape ends of cable safeguard 'A' Red)

						10.00
Design Engineer	0410	D. Sheel	10/3/87	THO des	R LEV	10 127
1. Q. K. Charle	10-4002	4 market	10/10/	847:25 Tr	BESP hus Eng	411241



# Florida ENGINEERING INSTRUCTIONS Power Crystal River Unit 3

Sheet 11 of 17

Wiring Instruct  a. Termina  Circuit I  ASF 32  Wiring instruct  NOTE: Re  spa	te the followi No. Wire Slack White tions for Rela	ion  P-S4, Sketch No. 14:  ng circuit as follows:  Color/Wire Mark  (1)/21  (2)/22  y Rack RRJA, Sketc  , 4 £(-;	Breaker 4 4 h Nos. 15, 16, 17,	
a. Termina  Circuit I  ASF 32  Wiring instruct  NOTE: Re  spa	te the followi No. Wire Slack White tions for Rela	ng circuit as follows: Color/Wire Mark (1)/21 (2)/22 y Rack RRJA, Sketc	Breaker 4 4 h Nos. 15, 16, 17,	
Circuit I ASF 32 Wiring instruct NOTE: Re spa	No. Wire Slack White tions for Rela	Color/Wire Mark (1)/21 (2)/22 y Rack RRJA, Sketc	Breaker 4 4 h Nos. 15, 16, 17,	
ASF 32 Wiring instruct NOTE: Re	Siach White tions for Rela	(1)/21 e (2)/22 y Rack RRJA, Sketc	4 4 h Nos. 15, 16, 17,	
Wiring instruct NOTE: Re	White tions for Rela	e (2)/22 y Raek RRJA, Sketc	4 4 h Nos. 15, 16, 17,	
NOTE: Re			h Nos. 15, 16, 17,	
spa	ference MAR		/ al -1(en	18, 19. CBD
. Install		TST-10-94-01 which	h removes relays	from the
a. install re	lays TMA and	TMB as indicated or	Sketch 15.	
b. Install #	14 AWG SIS R	ed wires as follows:		
	om_	то	_	
		TMA-1-Sketch	16	
			07.0	
140-1-9	. 14	4		
e. Convert				
d_ install #1	4 AWG SIS G	ray wires as follows:		
	<u></u>	то		
TMA-3-S	ketch 16	TB13-12-Skete	h 19	
			00.55	
TMB-3-51	ketch 16	TB13-10-Sketc	n 19	
TM8-4-51	ketch 16	TB13-11-Sketc	h 19	
	AR-1-Sk BA-1-Sk BA-2-Sk AR-3-Sk AR-4-Sk TMA-2-S C. Convert d. Install #1	e. Convert contact Ba-3/	AR-1-Sketch 17 TMA-1-Sketch BA-1-Sketch 17 TMB-1-Sketch BA-2-Sketch 17 TMB-2-Sketch AR-3-Sketch 17 TB14-21-Sketch AR-4-Sketch 16 TMB-2-Sketch TMA-2-Sketch 16 TMB-2-Sketch Convert contact BA-3/4 from N.O. to N.C.  d. Install \$14 AWG SIS Gray wires as follows:  From To  TMA-3-Sketch 16 TB13-12-Sketch TMB-3-Sketch 16 TB13-13-Sketch TMB-3-Sketch 16 TB13-10-Sketch	AR-1-Sketch 17 TMA-1-Sketch 15  BA-1-Sketch 17 TMB-1-Sketch 16  BA-2-Sketch 17 TMB-2-Sketch 16  AR-3-Sketch 17 TB14-21-Sketch 18  AR-4-Sketch 17 TB14-22-Sketch 18  TMA-2-Sketch 16 TMB-2-Sketch 16  Convert contact BA-3/4 from N.O. to N.C.  d. Install \$14 AWG SIS Gray wires as follows:  Prom To  TMA-3-Sketch 16 TB13-12-Sketch 19  TMA-4-Sketch 16 TB13-13-Sketch 19  TMB-3-Sketch 16 TB13-10-Sketch 19



Sheet 14 of 17

MAR/REING. TS7-10-09-01 10/24/87
Proport: ASV-5/204 Power Separation

e. Terminate circuits as follows:

Circuit No.	Wire Color/Wire Mark	Terminal Number
ASK 29	Black (1)/1705AL3 White (2)/1705AL4 Shield/	TB13-10-Sketch 19 TB13-11-Sketch 19 Float
ASK 30	Black (1)/100K White (2)/100AL Shield/	TB13-12-Sketch 19 TB13-13-Sketch 19 Float
ASE 37	Black (1)/8 White (2)/11 Red (3)/13 Green (4)/10 Orange (5)/Spare	TB14-15-5ketch 18 TB14-22-5ketch 18 TB14-20-5ketch 18 TB14-21-5ketch 18

- 17. Wiring Instructions for RRSB1, Sketch No. 20.
  - a. Terminate circuit ASK 30 as follows:

Wire Color/Wire Mark	Terminal Number
Black (1)/100K	TB12-27
White (2)/100 AL1	TB12-28
Shield/	Float

18. Installation instructions for MCB Section PSA/EFIC, Sketch Nos. 21 and 22.

19 KT-11/187 dt 11 11 CGO 4 11 11

NOTE: Reference MAR T87-10-04-01 which removes existing 'AD' push

Install three-holes for frems-TMI-TM2, and TM3 on-the-main-control board per Sketch No-21, of Sw. Ich and Light for Sketch 21.

Fabricate escutcheon plate per Sketch No. 22.

Install escutcheon plate and panel Items TM1, TM2, TM1, and TM4 per Sketch No. 21.

d. Engrave and install nameplate per Sketch Nos. 21 and 22.

Ocean ingree Date vertication ingress 10/30/07 \$ 1000 to Get to Get 10/20/57

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Sheet 15 of 17

			2 17 Ot 11
	T87-10-09-01		Doto 10/34/87
reject :	ASV-5/204 Power Separat	lon	
	C CHIMI	C SEC CIAL COMME	. /
INSERT PER THE 15 A -		arders (Reference B/M Item	Nov 81) per Sketch
C:30 19.	Wiring instructions for MC and 26.	B Section PSA/EFIC, Sketc	ch Nos. 23, 24, 26,
11.2/6)			
Military St.	a. Install #18 AWG SIS re	d wiring as follows:	ner
			11/15/2
	From	,	
	TM1-1-Sketch 23	T944-17 F-1-1- 41	
	TM1-2-Sketch 23	TB59-14-5ketch 24 TB56-1-5ketch 24	
	TM1-2-Sketch 23	TM2-2-5-e:ch 23	
	TM2-7-Sketch 23	TM3-2-5-etch 23	
	TM2-1-Sketch 23	TB\$9-2:-5ketch 24	
	TM3-1-Sketch 23	TB59-2:-5ketch 24	
t	. Install #14 AWG SIS red		
	From		
	TM4-3-Sketch 23		
	TM4-3-Sketch 23	TB56-2-5cetch 24	
	TM4-4-Sketch 23	TM4-7-Seetch 23	
	TM4-8-Sketch 23	TB59-15-Sketch 24 TB59-8-5ketch 24	
e.	2		
	7	**** **** E3 . 2.10 ** E1	
ruc =(1)!	From		
150 mile	734	445a 1500	
7	AE4-11-Sketch 25	TB40-1-5 <etch 25<="" td=""><td></td></etch>	
(F) 13 87	AE4-9-Sketch 28 Z3a	TB40-2-5 <etch 26<="" td=""><td></td></etch>	
- "[ .	AE4-10-Sketch 76 23A	TB40-1-5 <etch 26<="" td=""><td></td></etch>	
d.	Install #14 AWG SIS gray	wire as follows:	
	Frem		
	TB40-5-Sketch 26	TM4-1-French 25	CON WINET
	TM4-2-Sketch 23	TM4-1-Setch 23 AE4-11-Setch,2523A	٢٥١١ ١١١
( ngunoer	Dete Verification Engine	or Date Fasory	iper.Huddar Engineering , Day



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T87-10-09-01

11/13/87

Project

ASV-5/204 POWER SEPARATION

- 18. C. DETERMINATE THE SWITCH COARD WIRING PRUM DEVICES
  ACT, AREN AQ, AP, AN AND AM. REMOVE THESE DEVICES BELLES
  FROM THE MAIN CLUTROL DUARD, RETAIN THEM FOR REMUSELLATION IN STEP 18 K.
  - F. FABRICATE A COVER PLATE FOR THE AFFECTED AREA OUT OF # 10 GAGE STEEL PLATE. THE PLATE SHALL BE 3.5 = 0.1 IN HIGH AND 3.5 = 0.1 IN -DE.
  - G LOCATE THE PLATE OF THE MAIN CO. TILL BEARD PER ARA,

    SCETCH DI. LOCATE ALD POLICE MILED THE DEVICED ARI, ARI, ARI, ARI,

    AQ, AP, AN AND AM POR SELTEM DI. THE SWITCH FOR ASV 5

    SHALL BE VERTICALLY ALIGNED WITH THE SWITCH FOR

    ASV. 204 THE EFIC CH B TO EFO. 2 START LOGIC LIGHTS

    SHALL BE VERTICALLY ALIGNED TO THE SIMILAR LIGHTS

    ABOVE FOR CHANDEL A. HORIZONTAL LOCATIONS SHOUND

    BE APPROXIMATELY AS SHOWN.
  - HUSING THE PREPARED COLOR DLATE AS A TEMPLITE,
    CUT OR DRLL HOLES IN THE MAIN CONTROL BOARD TO
    MATCH.
  - SEE THE PAINT SPECIFICATION IN MAR 80-08-10-11
  - INSTRUCTIONS FOUND IN THE NOTES OF DRAWING E-201-334, REY 1.
  - K. INSTALL DEVICES ARI, ARR, 4=3, AQ, AP, AN AND AM AND RETERNINATE THE WIZING PER SCETCH 23.4

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Sheet 18 of 17

MAR/ED Bo.

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T87-10-09-01

Dete

10/14/87

Project :

ASV-5/204 Power Separation

Terminate circuit ASE 36 as follows:

Circuit No.	Wire Color/Wire Mark	Terminal Number
ASE 36	Black (1)/8 White (2)/9 Red (3)/13 Green (4)/10 Orange (5)/16 Blue (6)/18 White/Black (7)/20 Red/Black (8)/ Green/Black (9)/	TB\$6-2-Sketch 24 TB\$6-1-Sketch 24 TB\$9-8-Sketch 24 TB\$9-15-Sketch 24 TB\$9-16-Sketch 24 TB\$9-26-Sketch 24 TB\$9-27-Sketch 24 Spare Spare

- 20. Demolition of cable and conduit for ASY-5 and ASY-204
  - Remove the following cables per E/I Sketch A and their respective cable pulling data sheets.

ASE 30

ASE 28

ASF 31

**ASE 27** 

Remove the following conduits per E/I Sketch A ь.

ASK 1-1/2"

ASE 28-3/4"

ASE 27-1"

ASF 31-1"

ASE 30-1 1/2"

- Plug all holes in motor starter ASV-204. Terminal Boz AS-1, Terminal c. Box AS-9, motor starter ASV-5 and MOV ASV-5.
- OI REMAINS INSTRUCTIONS FOR THIS TEMPORARY MAR TO BE ISSUED WHEN THE MAR IS ISSUED POR THE PERMI-NENT SOLUTION TO THE DIESEL PROBLEM. COD .. 1. 15/17

Jeen141) & 11/13/87

Oursign Engineer P.A. Rhom da	1/29/07	Ha half	10/32/87	Hack	The Rev	10/20/27
Sec. 191	1-1-1-1-1		and the state of t	** 62 768	"RESP; Nut Eng	912243



Sheet 17 of 17

MAR/REING.

T87-10-09-01

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10/24/37

Project !

ASV-5/204 Power Separation

### F. EXAMINATION

Visually inspect component installations and wiring terminations to assure proper installation and termination in accordance with the MAR sketches and maintenance procedures.

#### G. TESTING

Upon completion of this modification, motor operated valves ASV-204 and ASV-5 shall be functionally tested to assure proper valve operation, and all limit switch functions (i.e., indicator lights, alarms, interiocks) shall be monitored to assure that the valve control logic has not been altered by this modification. After installation, all wiring shall be tested for continuity and insulation integrity, as applicable, in accordance with FPC standard procedures.

#### H. IN-SERVICE INSPECTION

Not applicable.

60 RAM 10/20/07 Stockhoff 10/2/07 Hadri H Lev 10/2/1)



## PROJECT ASSIGNMENT Nuclear Engineering

MAX TE7-10-09-01	
ASVISIZEY POWER SEPARATION	-
The below listed personnel are assigned the responsibility for the subject pro	
DESIGN ENGINEERIS	HOCE
G117	
C-/CI R = Classon.	(Lead)
"	
439 53	
VERIFICATION ENGINEERCH	
: /c I.	
2	
(-D	
Markon related to the titles	b/I
C.B Douge 11/1/87	

Onginal

Lead Design Engineer

...

Other DesignWeithEatign Engineers

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# DESIGN DATA SHEET Crystal River Unit 3

	read n		T87-10-09-01	OCTOBER 14. 19
***	UICT		ASV-5/204 POWER SEPARATION	PYSTON AS
		8	RITERIA: Safety Listing Rev. 24 Dated 7-10-87 Page Safety Classification Review Form (attach copy) ELATED: S Yes G"No	00 <u>1-15</u>
	***	**	APPLICABLE DESIGN INPUT REQUIREMENTS	
2.	. 5	00	Performance requirements such as capacity, rating, system output.	
J.	2		Codes, standards, and regulatory requirements including the applic addenda.	able Issue anc/or
	£	Ξ	Design conditions such as pressure, temperature, fluid themistry a	nd voltage.
	2	=		
6.	×	=	Environmental conditions anticipated during storage, construction i	and operation such as
			pressure, temperature, humidity, corrosiveness, site elevation, wind	direction, nuclear
			radiation, electromagnetic radiation and duration of excisure, 10CF	R50.49 applicability
			For electrical equipment only, reference above Safety Listing page	or allach copy of
•	ž	-	Environmental Qualification Recuirements form.	
	-	-	interface requirements including definition of the functional and phinyolving structures, systems and components.	ysical interfaces
8	£	-	Material requirements including such items as compatitivity, electric	
	-	-	protective coating and corresion resistance.	cal insulation procedues.
9	=	ī	Mechanical requirements such as vibration, stress, shock and react	on forms
10	Ξ	Ī	Structural requirements covering such items as equipment foundation	004 404 0404 4 1044
11.		Ī	Hydraulic requirements such as pump net positive suction heads (N	PSMI allowable
0.1000	-	-	pressure drops, and allowable fluid velocities.	Parit monerale
12.		Ξ		igns on water
			chemistry.	
3.	£	=	Electrical requirements such as source of power, voltage, raceway r	equirements, electrical
			insulation and motor requirements.	
4.	2	$\subseteq$	Layout and arrangement requirements, to include potential adverse	affects of non-
		_	seismically qualified masonry walls.	
5.	7		The state of the s	artup, normal plant
			operation, plant shutdown, plant emergency operation, special or int	frequent operation, and
	_	_	system abnormal or emergency operation.	
6.	Œ		instrumentation and control requirements including incisating instru	ments, controls and
			alarms required for operation, testing, and maintenance. Other requi	rements such as the
			type of instrument, installed spares, range of measurement, and loc should also be included.	ation of Indication
7.	0	=	Access and administrative control requirements for plant security.	
	2		Redundancy, diversity and separation requirements of structures, sy	stems and components
		Ξ	Failure effects requirements of structures, systems and components	including a getion on
		Ξ,	of those events and accidents which they must be designed to with	stand.
C.	ī	=	Test requirements including in-plant tests and the conditions under performed.	
١.	C	ī	Accessibility, maintenance, repair and inservice inspection requirem including the conditions under which these will be performed.	ents for the plant
140-	1-4-1	100	ante presentante antimosa ante approvação	meters francesmes . 2-13
C	.7	21	alistic hatthauf 10/2/07 + acin	for 100 - 1: 100
	-			



# DESIGN DATA SHEET Crystal River Unit 3

*	-	North C	T87-10-09-01	SHEET 2 O
70	ACT	_		OCTOBER 14. :
_	_	_	ASV-5/201 POWER SSEPARATION	A5
	795	•	APPLICABLE DESIGN INPUT REQUIREMENTS: (Continued)	
22	3	0	Personnel requirements and limitations including the qualification and available for plant operation, maintenance including the qualification and	number of personne
	0	2	Transportability requirements such as size and shipping weight, limits regulations.	ARA) Hons, I.C.C.
200	_	•	or resistance requirements. (Check applicable letter	
			a. Changes or additions/deletion of fire detection suppression syst	ems or equipment.
24	_	2	existing fire detections uppression to the plant toning ration that change the	effectiveness of
25.	Ξ	2		
27.	2	=	Materials, processes, parts and sourment total and safety of the	
8.	Ξ	Ξ	WE TIS INCHES TO DISVENTING CALLERS	
				from enclosures and
9	-	¥	grounding of electrical systems.	
0.	=		Accition or re-scation of sale shutdown equipment, sistems, component require compliance with the separation enters stated in 10CFR50, Applianted modification will modify an item that: (Check applicable letter(s))	nts, or circuits that
			a was originally procured and installed in an unmodified state and parts are stocked; or.	or which stare
			E. is being procured as a part of this modification and will be modifi-	ed after receipt: or
			is currently in inventory (FIMIS) in an unmodified state and will be installation and/or restocking	modified prior to
			C. will be completely or partially replaced by an item of different des	elenetem to no
. 2	: :	= ;	If "Yes" to any of the criteria, forward a completed copy of the Design ( Input Record, Engineering Instructions, PR/SOM/material specifications of other applicable supporting documentation (Instruction Manuals, Vendor Drawings, Sketches, Figures, etc.) to Site Nuclear Procurement Engineer The modification adds or relocates control room equipment entailing operequires Human Factors design review per the chiena stated in NUREGA (Ref: FPC Specification SP-5145)	Data Sheet, Design (as applicable) and Drawings, FPC ing

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		7	-	*[7 . 7 * *** of \$110 anima topomona 117 11



Sheet 1 of 5

REI/MAR RO.	MAR T87-10-	-09-01			Date	OCTOBER 14, 1987
Project :	ASV-5/204 PC	OWER SEPA	RATION			
l. The	function of thi					
	4	a modificat	ion is to a	teure that	the t	urbine driven emergenc
	Water numb EFF	•2 will be o	nerable in t	he event o	1 . (4)	lure of the FSB 250/125
DC	system coincide	nt with loss	s-of-offsite-	nower and	an F	S actuation. Under thi
1000	ario EFP-2 will	be relied u	oon to share	the emer	Yanas	feedwater load with the
Tat	or driven emerge	ney feedwa	ter pump in	order to	*****	se the electrical load on
dies	el generator EDC	7-1A. In a	eder to seri			operable for the above
- Name	THE MODITI	cation remo	wes the 250	1331 DC F	S -B-	power from ASY-204 and
						eparating the ASV-5 and
ASV-	204 power and co	ontrol elrevi	ts which are	presently	wired	in parallel, and providing
	arate control swi					
2. The c	epacity and ratio	E Of ASY-20	M will not be	changed	by this	modification. However,
						s of 10CFR50. Appendix
						e shutdown isolation will
	required for AS			******	- MAILURA	WILLIAM WILLIAM WILL
			***************************************			
L IEEE-	323-1974					
IEEE-	144-1975					
	383-1974					
2000000000000	HEVAN TO LET ANY THE					
.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	150. Appendix R					
n Engineer	Dete	Verthagunge Le	agrage /s	Date	1434	erviger, Nyclaar Engineering   Op
PReso	4 1/20/87	1 shoto	Luft	12/3/8	1	also to ker while
11			/ /	467 60	. 01 014	RESP: Nuclear (na negring 4".



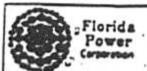
Sheet 2 of 5

REI/MAR NO.	MAR T87-10-09-01	Done	OCTOBER 14, 1987
Project :	ASV-5/204 POWER SEPARATION		
4. Pos	ver and control voltage to ASY-204 she	ull remain at 250/;;	S VDC.
	e circuits which will be classified as		
	Ifled raceway. Relay racks and the m		
inte	stity to account for the addition of an	Y DEW COMPONENTS.	
5. This	modification involves wiring changes	a: ASV-204 and A	ASY-5 (Environmental Zone
	adds a control switch and indicator in		
	a in the Relay Room (Environmenta		
	conmental data sheets defining the er		
	e zones are attached.		
I. The s	control circuit for ASV-204 that, interf	ace with the EFIC	System as follows:
4	normally open EFIC actuation conta	ict shall be wired in	n parallel with the control
	witch contact in the valve "opening"		
	04 when EFIC is actuated.		
	normally closed EFIC actuation cont		
	hen EFIC is actuated.	circult to Intercup	t the closing of ASY-204
n Linguneer	Date Verdicapon Engineer	an Date , S	porvide, Nutteer Engineering   Dat
1 PRak	10/20/17 Frank	L 10/30/07 P	the late of the



Sheet 1 of 5

(I/MAR Bq.	MAR T87-10-0	19-01	Dese	OCTOBER 14, 1987
oject :	ASY-5/204 PQ	WER SEPARATION		
		•		s of IEEE-181-1974. New
	allfied for the appli	estion in which they a	re to be used.	
il. Po	wer for ASV-204 sh	ALL De 250 VDC ES Ch	annei "A" power f	or the motor operator and
:2	5 VDC ES Channel	"A" power for the y	alve control circu	ilt. The circuits shall be
:2.	ied in accordance	with CRI ES Chann	el Securation Cri	teria. The motor starter
				h the starter space heater
7.7				lihough space heaters are
				es for ASV-5 and ASV-204.
				separate co1E 120 VAC
14 - Th	e control switch an	d indicator lights for	ASV-204 shall be	located on the PSA/EFIC arred Suria Lutant
m \	Switch "AD	2" Is being removed vis	17	
"		a ASV-204 le requie	ed to be operate	onal for a loss-of-power
				liure of the 125 VDC ES
	annel "B" power sys			
	Aniste A MARKET SA	, E Ma		
age Lingunger	Date	Verdusting Engineer	11 0000 , [1	Mongar traces Ingunering of
OTR=	de 1d29/47	Photolines	E 10/30/1979	lotor Mi M reporte



Sheet 4 of 5

Congress of the Congress of th	The second secon		OCTOBER 14, 1987
Project :	ASV-\$/204 POWER SEPARATION		
	te manual control and indication sh		
	e such that the control switch must		
valve	travel. Automatic central of AS	V-204 shall be as d	escribed in Item 7 abov
Palsti	z alarms utilizing ASY-204 and	ASY-5 control to	gic shall be maintainer
Auxili	ary relays shall be used, as required.	to provide the sist	m logic from ASY-204.
15. Refers	cce DIR Items 2 and 13 above.		
	ilures and events that this modified in DIR Items 5 and 15 above.	cation is to be des	med to withstand are a
	and automatic operation of ASV-		
12. Cable 2	outing design and component location	on shall consider ma	mining doses ALARA.
this mo	relays controls indicator lights.	the selamic and/or	environmental criter:
applicati po Engineer	Dete   Verticales (respect	ch they are to be in	
a PRaise	10/20/02 the Dethead	10/30/07 7	taster to (pr 10 ho)



Sheet 1 of 5

REI / MAR BID.	MAR T87-10-01	J-01	Doto	OCTOBER 14, 1987
Preject :	A5Y-\$/204 POW	ER SEPARATION		
II. Exis	ting plant electrics	al grounding proced	ures shall apply.	
21. With	the implementati	on of this modific	ation, there will be	separate control switches
				est one common switch and
				th and Indicator listin for actors Design Conventions.
	Gate 6 /6/29/87			



## SAFETY CLASSIFICATION REVIEW Crystal River Unit 3

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## ANALYSIS / CALCULATION

SHEET 1 OF 1

REI/MAR Do.

MAR T87-10-09-01

Dote

OCTOBER 14, 1987

Project :

ASV-5/204 POWER SEPARATION

## ATTACHMENT TO "SAFETY CLASSIFICATION REVIEW" FOR V. LYE MOTOR OPERATOR ASY-194

Safety Listing Revision 24, Page 1-15 lists valve motor operator ASV-204 as Safety Channel B. The modification of MAR T87-10-09-01 will change the motor and control power to ASV-204 from ES "B" 250/125 VDC to ES "A" 250/125 VDC. Consequently, the channel designation for ASV-204 on Page 1-15 of the Safety Listing must be changed from "B" to "A".



# VERIFICATION REPORT Crystal River Unit 3

21	

T87-10-09-01

10/29/87

PROJECT:

ASV-5/204 Power Separation

	res	NO	МА	
1.	2/			Were the inputs correctly selected and incorporated into design?
2	A	=		Are assumptions necessary to perform the design activity adequately described and
				reasonable? Where necessary, are the assumptions identified for subsequent revertications
	/			when the detailed design activities are completed?
1	4	C		Are the appropriate quality and quality assurance requirements specified?
4	2	=		Are the applicable codes, standards and regulatory requirements including issue and addensa
S	./	1	_	properly identified and are their requirements for design met?
,	1	00000	2	Have applicable construction and operating experience been considered?
6,	5	=	-	Have the design interface requirements been satisfied?
	1	Ξ		Was an appropriate design method used?
8.	4	Ξ	_	Is the output reasonable compared to inputs?
9	·V	Ξ	Ξ	Are the specified parts, equipment, and processes sultable for the required application?
10	•	-	Ģ	Are the specified materials compatible with each other and the design environmental
	V	-	-	conditions to which the material will be exposed?
11	1	=	=	Have adequate maintenance features and requirements been specified?
12	•	-	_	Are accessibility and other design provisions asequate for performance of needed maintenance and repair?
13	=	2	3/	Mas adequate accessibility been provided to perform the in-service inspection expected to be
				requires during the plant life?
14	V	=	=	Has the design properly considered radiation exposure to the public and plant personnel?
. 5	V	=		Are the acceptance criteria incorporated in the design documents sufficient to allow
	,		-	ventication that design requirements have been satisfactorily accomplished?
16	٧,	2	С	Mave adequate pre-operational and subsequent periodic lest requirements been appropriately specified?
17	Y,	=		Are adequate handling, storage, cleaning and shipping requirements specified?
18	1/2	3		Are adequate identification requirements specified?
19	Z,	=		Are requirements for record preparation review, approval, retention, etc. adequately specified?
272	Z,	3		Has seismic adequacy been considered and evaluated and are the results acceptable?
1	V	7	0	Have fire protection considerations been adequately addressed?
nave	r pert	ome		erification on the subject MAR design package and lind the results
	Cepta			□ unacceptable
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10/20/87

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EXTENT OF VERIFICATION:	
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# FIRE PROTECTION REVIEW Crystal River Unit 3

			_	KAR T87-10-09-01	OCTOBER 28, 190
_				ASV-5/204 POWER SEPARATION	AS
	766	200		ž	
1.	¥	0		of the design/design change involve the modification, addit of the following? If yes, explain in space provided. Combustibles (oil, hydraulic fluid, grease, wood-based ma cable insulation, carpet, etc.)	
				See Attached Sheet	
		æ	b.	Available Fire Protection (detectors, fire extinguishers, he system, CO <sub>2</sub> system, etc.)	ose stations, sprinklers, halon
		×	c.	Equipment, components, or caples that would interfere with detection, emergency lighting, or other lire protection	
	ž	Ξ	đ.	Penetrations, penetration seals, or conduit seals (If yes, if applicable)  See Attached Sheet	update Penetration Seals Lis
		¥	•.	Space Separators (walls, cellings, noors, doors, curbs, da	mpers, etc.)
	×	2	t.	Fireproofing, exposure fire protection, cable fray covers/wrap See Attached Sheet	pping, conduit wrapping, etc.
2	Ξ	2		this design/design change require a revision to the Fire H. Sect. V.C.	azards Analysis? Reference
1.	00/2	a. Avr	sale	s this design/design change deviate from any applicable N ty-related or sale shutdown areas/zone? If yes, explain belineer review and concurrence.	IFPA Fire Code requirement in ow and obtain Fire Protection
	000	a.ker	sale Engi	ty-related or sale shutdown areas/zone? If yes, explain belineer review and concurrence.	FPA Fire Code requirement ow and obtain Fire Prote
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### ANALYSIS / CALCULATION Crystal River Unit 3

SHEET \_1\_OF \_1\_

BET / MAR Re-

MAR T87-10-09-01

Dete

OCTOBER 28, 1987

Project :

ASV-5/204 POWER SEPARATION

### ATTACHMENT TO PIRE PROTECTION REVIEW

### Item 1.s.

This modification involves the installation of an approximate total of 3.200 feet of various power, control and instrumentation cable. Most of this cable is routed either in conduit or fire protected cable tray and, thus, does not contribute to the combustible load in the respective fire areas. The only fire areas where some of the above cable is routed in open cable trays are the Cable Spreading Room and the Relay Room. In the Cable Spreading Room, most of the cable tray route is in tray less than 3.4 full. Since the Fire Hazard Analysis is based on trays 50% filled, the additions, rables do not affect the overall combustible load in this area. The cables in the Relay Room are very short runs where as they penetrate the ceiling and drop into the relay racks. The cables consist of a 5/C #14 control cable and two 2/C #16 instrument cables. The amount of combustible load contributed by these cables is considered insignificant.

#### item 1.d.

This modification requires a conduit penetration through the intermediate Building EL-119 floor, which requires resealing to the equivalent rating of the floor. Cables will penetrate through existing sealed penetrations in the following fire barriers:

Intermediate Building Floor EL-119
Control Complex West Wall On EL-134
Control Complex Floors EL-134 And 145

Upon completion of cable installation, these penetrations shall be resealed to the equivalent fire rating of the respective fire barriers.

#### Item 1.f.

Fire protected cable trays that need to be opened to accommadate cable installation shall be resealed to the required fire rating of the respective trays.

							-
Design Engineer	1/24/17	HD Drack	142/27	4	ladin	4 (1/	white

MAR NO. TS7 . 10- 09 . 01

SAPETY EVALUATION: Asswer the following questions and provide specific justification time attachment if necessary).

Is the probability of an expurence or the consequence of an accident or mallunction of equipment important to safety as previously evaluated in the Final Safety Analysis Report, INCREASED?

YES NO X

Because:

See Attached Sheet

2. Is the possibility for an accident or malfunction of a different type than any previously evaluated in the Final Safety Analysis Report, CREATED? YES NO X Becauses

See Attached Sheet

3. Is the margin of safety, as defined in the basis for any Technical Specification, REDUCED? YES NO X

Because:

See Attached Sheet

LICENSE REVISION REQUIREDS

Final Salety Analysis Reports

Technical Specifications

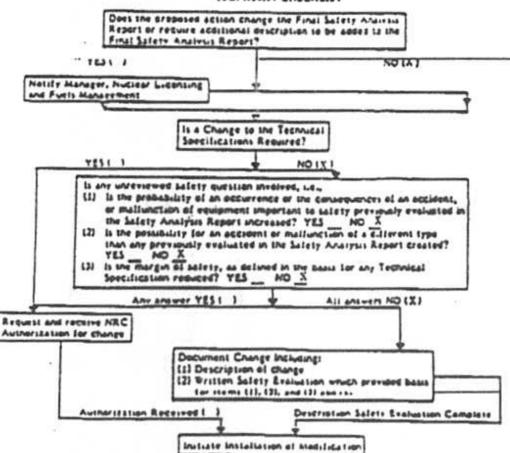
NRC Authorization for Change Required:
Semi-Annual Reporting to NRC Recurred:

YES NO X

NO X

NO X

#### IOCFR 30.37 CHECKLIST





## ANALYSIS / CALCULATION Crystal River Unit 3

SHEET 2 OF 3

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MAR TET-10-08-U1

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Project :

ASY-5/204 POWER SEPARATION

## ATTACHMENT TO MODIFICATION SAFETY SYALUATION

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- ASV-5 and ASV-204 are motor operated valves having identical functions of supplying steam to the turbine driven Emergency Feedwater Pump (EFP-2). Since EFP-2 is the ES "B" channel pump, ASY-3 and 204 were electrically connected in parallel to a common 250/125 VDC ES "B" channel power and control source. This modification electrically separates ASV-704 from ASV-5 and repowers ASV-204 from 250/125 VDC ES "A" channel power. Also, separate control room controls and separate "A" channel EFIC interlocks are being provided for ASV-204. Automatic control logic of ASV-204 has not changed. Therefore, the probability of an occurance or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR is not increased since the logic of automatically opening ASV-204 whenever the EFIC System calls for emergency feedwater has not been altered. The reliability of EFP-2 has actually been increased because with this modification either "A" or "B" train power will control and operate one of the steam inlet valves to EFP-2 as opposed to both valves being "B" train powered. FSAR Sections 7.2.4, 8.2.2.6 and 10.2.1.6 have been reviewed.
- 7. The electrical separation of ASV-204 from ASV-5 does not impact the design function of either valve to supply steam to the EFP-2 turbine. Power and control for ASV-5 is not affected by this modification and ASV-5 retains its automatic control logic, remote manual control, local manual control and remote shutdown isolation and control. ASV-204 is being powered from the redundant power channel, and will be provided with its own remote manual control and with separate EFIC interlocks for automatic operation. The type of remote manual control and automatic operation of ASV-204 is the same as for ASV-5. Therefore, based on the above, the possibility for an accident or maifunction of a different type than any previously evaluated in the FSAR is not created. FSAR Sections 7.2.4, 8.2.2.6, and 10.2.1.6 have been reviewed.

퉦

	Date	Varification Engineer	Date	Signerator, Nuclear Engineering   Pate
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### ANALYSIS / CALCULATION Crystal River Unit 3

SHEET 3 OF 3

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MAR TET-10-09-01

Date

OCTOBER 19, 1987

rrepost a

ASY-5/204 POWER SEPARATION

This modification enables the turbine driven Emergency Feedwater Pump (which is the "B" channel pump) to be operational even if a failure should occur on the "B" channel power system for which shutdown operation would be via the "A" channel systems. With this capability, the turbine Criven EFW pump is able to operate and share the EFW requirements with the "A" channel motor driven EFW pump. This will reduce the electrical load on the "A" channel diesel generator for the condition of an ES actuation coincident with a loss-of-offsite-power and failure of the "B" channel power system. Consequently, with this modification the margin of safety, as defined in the basis for any Technical Specification, is not reduced. It is actually enhanced because of the increased availability of the turbine driven Emergency Foodwater Pump. Technical Specification Sections 3/4.7.1 and 3,4.5.1 have been reviewed.

Doro Verille 1./24/67 Whithalf 10/3/67 Habis in LEV = 1/2/67

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## MAR. T87-10-09-01

10	C7R 80.64 Revis	res					
dag	cribed in any of	tion or document revision of the lotioning plans/program responsible person designal	ns7 If unable to				
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		nded Security Plan Manager, Nuclear Licensin	•	C	Yes	0	NE
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	perform the ex	priate responsible person to rejustion and attach. The evil Division Head responsible for	siveton must be ap-	а	Eralva Compi		Z'NA
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☐ Submitted

IF ALL OF ABOVE ARE CHECKED NO, NO FURTHER REVIEWS ARE REQUIRED.

If "yes", submit change to Manager, Nuclear Licensing to evaluate

the reporting requirements.

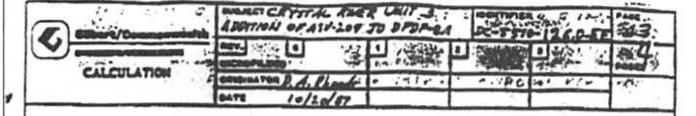
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PERIFICATION REQUIRED (CHECK METHOD(N))

DESIGN REVIEW ALTERNATE CALCULATION DUALIFICATION TESTING DISCHTIFICATION OF VERIFIER/VERNATEDATION SEAS H. T. Granff

PROJECT ENGINEERS LOCATION OF TERMS AND SEAS H. T. Granff



## 1. PURPOSE

Review the 250/15 VDC ES X' power distribution system to varify that sufficient copacity is evailable to power meter copacity is evailable to power meter control valve ASV-204 from distribution power DPDFBA.

: . 6, 7 .

## 2. DESIGN INPUTS

A. Scope Doc-ment FCS-8915 dated 10/12/87

E. Calcilation DC-CR3-017-Ei, Rov. O

C. Calculation DC-5079-275.0-EE, Row. O

D. Motor Dais Sheet for ASV-5

## 3. CONPUTER PROGRAMS USED

None

## 4 ATSJATTIONS

None

## 5. CALCULATION

For D.I. 2. C above, the electrical requirements of ASV-204 are identical to ASV-5. The motor date sheet for ASV-5 indicator a full lied current of 2.9 amps and a lacked inter current of 16.2 amps.

458-204 is being powered from datribution powel DPDP-8A.

Por page 29 of 40 of Calculation DC-CRS-017-EE, Rev. O (D.I. 2.8) the load on IPDP-BA (-ithin: 154-204) is 94.5 emps for the first minute of the lattery duty excla and 4.5 amps of the the first minute.

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C Silvert/Donnesseeds	ABITION OF ASVEN	TO DPDAGA	DC-5510-1264-EE	4
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CALCULATION	DATEMATOR DARRAGE			POSC)
	MATE 10/20/67		-	1

Allowing one amp for control circuit power and conservatively assuming that the mater current for the first immube is equal to the LRA value, the addition of ASV-204 (which will appear during the first rainate of the battery duty cycle) increases the load on DPDP-8A. to 111.7 caps for the first minute and 5.5 cmps after the first minute. This is well within the 400 amp continuous rating is DPDR-8A.

Per peje 34 of wo = Colodon DE-CR3-017-EE, Rev. 0 (D.I.2.8) The total Ampere-Hour load on the 250/25 VDC ESA Trisom & 1111A-m vithout the addition of ASV. 204. With the addition of Asv. 204. The valing of the 250/25 VDC ESA contact 15 1580A-H.

## 6. CONCLUSION

Resed on the above analysis the new hold lood on the following the solition of ASV-204 to DIPP-BA is well within the system capacity.

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## POTER AND INDUSTRIAL STITEMS INVESTOR - READING DESIGN VERIFICATION RECORD

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D. A. Rhoods	P. CHONE	
THE COURSE CO.	**	
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	(4)	
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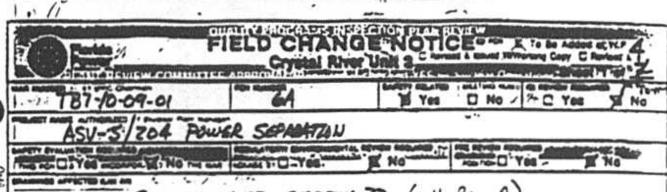
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- 1) REVERSE ZENGR DIODES ZD1, ZDZ \$203 ON SKETCH9.
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FCN# 11 TO T-MAR T87-10-09-01

DESCRIPTION OF FIELD CHANGE!

This FCN revises drawings and sketches to incorporate changes made by FCN 39 & 42 of MAR 87-03-13-02. FCN 39 was initiated to de-terminate the motor starter heater circuit of ASV-204. FCN 42 was initiated to assist the field in the implementation of FCN 39 and to correct the discrepancies between FCN 39 and T87-10-09-01. There is no field work involved, this FCN is for documentation only.

Interim drawings 201-061 sheets AC-19 & AC-19A are not being revised by this FCN, FCN 42 of 87-03-13-02 correctly updates these drawings.

Additional information is being added to the original MAR package in sections C. REFERENCE.

#### ADD TO! C. REFERENCES!

1. EQ# 90-1903

2. MAR 87-03-13-02 FCN's 39 6 42

### Florida

### MODIFICATION APPROVAL RECORD

	ORA REQUEST					
87-10-09-01A	105572	SAPETY RELATED	C No	E Yes		No
ASV-5/ASV-204 Power Se	paration			E Yes	0	No
AS	190		elska			
☐ Mechanical ☐	ary Expiration Date _ Electrical	E IAC	*W.R. No. for		O S	uppor
For Implementation	On-Line (Full load) _	On-Line (Re	duced load)			
This modification convergerment installation.  Minor plant changes are T-MAR can be documented installed per the T-MAR In addition, conduit roplant.	Temporary MAR To needed to be per- as a permanent in need to be relabe	87-10-09-01 was formed for this natallation. T	installed modificati	in refuel 6. on before the	•	n.

The temporary modification is being converted into a permanent installation in conformance with engineering design procedures. The temporary installation has been determined to be an acceptable method for electrical load demand reduction for the "A" emergency diesel generator. Electrical devices were only given a T-MAR numbering system instead of a proper equipment tag assignment designation. T-MAR deleted and requested that conduit routings be eliminated and actually work steps to remove them has not been accomplished per the T-MAR Engineering Instructions.

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	MODIFICATION APPROVALS.	3/4/12
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Meeting Number	CHARLIAN	
Plant Review Committee (PRC)		
NGRC Review Required ☐ Yes ☐ No NGRC Approval	CHARMAN	
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	MUCLEAR PLANT MANAGER	_
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	NUCLEAR PROJECTS SPECIALIST	
Temporary Modification Removed		1
Modification Testing	MAR TEST SUPERVISOR	-
Complete		1
Modification Installation Complete	NUCLEAR PROJECTS SPECIALIST	
and All Documentation Enclosed		



#### SAFETY EVALUATION

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AFETY EVALUATION: Answer the f	ollowing questions an	d provide specific ju	estificatio	n (use attach	ment If nece	11104
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#### ANALYSIS / CALCULATION

Crystal River Unit 3

Sheet 2 of 2

SELLINYS MANEE

MAR 87-10-09-01A

PROJECT

ASV-5/204 POWER SEPARATION

#### ATTACHMENT TO MODIFICATION SAFETY EVALUATION

- 1. ASV-5 and ASV-204 are motor operated valves having identical functions of supplying steam to the turbine driven Emergency Feedwater Pump (EFP-2). Since EFP-2 is the ES "B" channel pump, ASV-5 and 204 were electrically connected in parallel to a common 250/125 VDC ES "B" channel power and control source. This modification electrically separates ASV-204 from ASV-5 and repowers ASV-204 from 250/125 VDC ES "A" channel power. Also, separate control room controls and separate "A" channel EFIC interlocks are being provided for ASV-204. Automatic control logic of ASV-204 has not changed. Therefore, the probability of an occurrence or the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the FSAR is not increased since the logic of automatically opening ASV-204 whenever the EFIC System calls for emergency feedwater has not been altered. The reliability of EFP-2 has actually been increased because with this modification either "A" or "B" train power will control and operate one of the steam inlet valves to EFP-2 as opposed to both valves being "B" train powered. FSAR Sections 7.2.4, 8.2.2.6 and 10.5.3 have been reviewed.
- 2. The electrical separation of ASV-204 from ASV-5 does not impact the design function of either valve to supply steam to the EFP-2 turbine. Power and control for ASV-5 is not affected by this modification and ASV-5 retains its automatic control logic, remote manual control, local manual control and remote shutdown isolation and control. ASV-204 is being powered from the redundant power channel, and will be provided with its own remote and local manual control and with separate EFIC interlocks for automatic operation. The type of manual control and automatic operation of ASV-204 is the same as for ASV-5. Therefore, based on the above, the possibility for an accident or malfunction of a different type than any previously evaluated in the FSAR is not created. FSAR Sections 7.2.4, 8.2.2.6, and 10.5.3 have been reviewed.
- 3. This modification enables the turbine driven Emergency Feedwater Pump (which is the 'B" channel pump) to be operational even if a failure should occur on the "B" channel power system for which shutdown operation would be via the 'A" channel systems. With this capability, the turbine driven EFW pump is able to operate and share the EFW requirements with the 'A" channel motor driven EFW pump. This will reduce the electrical load on the "A" channel diesel generator for the condition of an ES actuation coincident with a loss-of-offsite-power and fallure of the 'B" channel power system—Consequently, with this modification the margin of safety, as defined in the basis for any Technical Specification, is not reduced. It is actually enhanced because of the increased availability of the turbine driven Emergency Feedwater Pump. Technical Specification Sections 3/4.7.1 and 3/4.8.1 have been reviewed.

College incinera	7/2/92	VERIFICATION ENGINEER	3/2/92	SUPERVISOR RUCLEAR ENGINEERING	3/2/92-
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#### **ENGINEERING INSTRUCTIONS**

Crystal River Unit 3

Sheet 1 of 16

TOWAR HUNGER

" HAR 87-10-09-01A

#### A. SUMMARY FUNCTIONAL DESCRIPTION:

This modification MAR 87-10-09-01A converts temporary modification MAR T87-10-09-01 into a permanent installation.

Temporary MAR T87-10-09-01 was installed in Refuel 6. The design function that is to be made permanent by this MAR is to assure that the turbine driven emergency feedwater pump (EFP-2) will be operable in the event of a failure of the Engineered Safeguard "B" 250/125V DC system coincident with , loss-of-offsite power and an engineered safeguard actuation. Under this scenario, EFP-2 will be relied upon to share the emergency feedwater load with the motor driven emergency feedwater pump (EFP-1) in order to decrease the electrical load demand on emergency diesel generator EDG-3A. To assure this capability, the temporary modification removed the 250/125V DC distribution source Engineered Safeguard "B" power from ASV-204 and repowered the valve from 250/125V DC Engineered Safeguard "A" distribution source. This involved separating ASV-5 and ASV-204 power and control circuitry (which were wired in parallel) and providing a separate main control board control switch, local pushbuttons, indicator lights, and EFIC actuation signal to ASV-204.

This modification requires that some minor plant changes be implemented before the T-MAR can be documented as a permanent installation. The changes involve the re-labelling of electrical equipment devices in the rear of the PSA/EFIC section of the main control board and auxiliary relay rack cabinet RRJA. The device label designation was not per engineering tagging convention and were assigned a label prefix "TM" which corresponded to mean "Temporary Modification Item number". The originators of the T-MAR did not acquire the appropriate equipment item tag designation. Therefore, the following electrical devices need to be relabelled as follows:

- a) The valve position status indicating lights for ASV-204 labelled as "TM1", "TM2" and "TM3" need to be relabelled as item numbers "BM1", "BM2" and "BM3".
- b) The three position GE CR2940US203E selector switch furnished on the PSA/EFIC bench board of the MCB along with the above indicating lights was labelled as board device item "TM4" and needs to be relabelled as "BM4".
- c) In auxiliary relay rack RR3A relay devices labelled as "TMA" and "TMB" needs to be relabelled as device items "DB" and "DA" respectively.
- d) This modification separates the alarm circuits for the valves. An alarm "steam supply not ready" will alarm if the valve is closed or valve control power is lost.

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4/88				RET: Life of Provi. RESP: Houseon Con. Eng.	undering \$12.243



#### ENGINEERING INSTRUCTIONS CONTINUATION SHEET

Crystal River Unit 3

Sheet 2 of 15

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MAR 87-10-09-01A

#### A. SUMMARY FUNCTIONAL DESCRIPTION: (Cont'd)

In the engineering instruction section for T-MAR 87-10-09-01 under installation instructions, it was instructed that a number of conduit routings be deleted and removed from in-plant service. This may not have been accomplished and possibly still remain in-place. To convert the T-MAR into a permanent installation, the below listed conduit routings may need to be removed ( if not ready done so) from the plant. The conduit routings are:

ASK1 - 1-1/2" ASE27 - 1" ASE28 - 3/4" ASE30 - 1-1/2" ASF31 - 1"

#### B. ATTACHMENTS:

1	i e	Design Data Sheets (2 Sheets with 3	Page Attachment)	
		Design Input Record (11 Sheets with	EDG Loading Justi	fication Sht.)
		Verification Report (1 Sheet)		
		Fire Protection Review (with 2 Page	Attachment)	
		HELB Review (1 Sheet with 1 Page Att	achment)	
		Modification Safety Evaluation (2 Sh	eets)	
		Regulatory/Environmental Review (1 S	heet)	
		MCB Bill of Material Input Record (8	Sheets)	
		ALARA Analysis/Calc. Form (' Sheet)		
	٥.	Environmental Qualification Applicab	ility Review (1 S	iheet)
	1.	Memo, J. A. Lese to R. Iwachow, July	12, 1991 (1 Shee	t)
1	2.	Environmental Qualification Applicab Memo, J. A. Lese to R. Iwachow, July G/C, Inc. Interim Drawings (All Revi CSI-95-4, Sheet 1(2000 REV. A 200) CSI-95-4, Sheet 2(2000 REV. A 200)	Sion AT, EXCEPTAD N	INTED) Chalalas
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		CS1-95-48 Galwer GS/5/92	211-026 EF-01	
		CS1-95-287 (6)	211-026 EF-12	
		201-1/2 Sieit.	212-008 ASE1	
		208-008 AS-01 (2 PARTIAL SHEETS) # 3/4 /12	212-008 ASE3	
		208-008 AS-07	212-008 ASE4	
1020		208-026 EF-01	212-008 ASF4	
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		200-106 CH 1	212-026 EFC2	
		200-136 CH 3/2 PARTIAL SARTE SALES	212-020 EFC5	CR3 005866
		209-106 SH. 1 209-136 SH. 3 (2 FASTIAL SHEETS)	212-026 EFKZ	
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#### DESIGN INPUT RECORD

Crystal River Unit 3

Sheet 1 of 11

. 87-10-09-01A	Bectrical	x uc	Mechanical	Structural
ASV-5/ASV-204 Power	Separation			

function of this modification is to convert modification T-Har 87-10-09-01 to a permanent installation which assures that the turbine driven emergency feedwater pump (EFW-2) will remain operable in the event of a failure of Emergency Safeguard "B" 250/125 Volt DC system coincident with loss-of-offsite-power and an Engineered Safeguard actuation. Under this scenario, emergency feedwater pump EFP-2 will be relied upon to share the emergency feedwater flow requirements with the motor driven emergency pump (EFF-1) in order to decrease the electrical load demand on emergency diesel generator EDG-3A. In order to assure that EFP-2 is operable for the above condition, this modification documents the removal of the 250/125V DC Engineered Safeguard "B" power from ASV-204 and repowers the valve onto the 250/125V DC Engineered Safeguard "A" distribution system. This involves the separation of ASV-5 and ASV-204 power and control circuits which were wired in parallel; thereby, providing redundant steam admission to EFP-2 for increase reliability. The physical wiring separation and circuit rerouting were accomplished under temporary MAR T87-10-09-01 which also provided for the addition of a control switch on the main control, local control station, pushbuttons, indicating lights and EFIC 'A' actuation signals to ASV-204.

This modification requires that some minor plant changes need to be implemented before the T-MAR can be documented as a permanent installation. These additional changes are as follows:

- a. Electrical devices added by the T-MAR were labelied with only a numbering system instead of a proper equipment tag assignment designation. The item tag designation for the three position selector switch and its position status lights needs to be re-labelled from "TMI thru TM4" to read as "BMI thru BM4". Also, two Clark type relays installed in auxiliary relay rack cabinet RRJA have been tagged with the temporary designation "TMA" and "TMB" and should be relabelled as "DB" and "DA" respectively.
- b. In addition, the temporary modification separated power and control circuits but did not provide for separation of alarm circuitry between safeguard channels. This modification incorporates design changes to reroute and rewire alarm circuits for ASV-5 and ASV-204. Alarm (100AL) "Steam Supply Not Ready" is being retained for ASV-5 and a new alarm (1521AL) "Steam Supply Not Ready" is being added for ASV-204. The logic for these alarms is also being change to "loss of power" or "valve not open". To accomplish this, T-MAR relay "TMA" is being SFARED and an existing 125VDC (non-time delay) relay in RR3A is being wired into ASV-204 control circuitry. Since the ASV-5 alarm relay is 120 VAC, 5 second delay, it will be adjusted to the minimum

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Crystal River Unit 3

Sheet 2 of 11

MAR 87-10-09-01A

delay (approximately 0.2 seconds). The differences in the relays is only a utilization of existing relays and not a diversification design requirement.

c. This permanent modification also spares alarm circuits that were affected by modification MAR 89-04-15-02 and MAR 89-04-15-03. The alarm circuits being spared provided an interlock interface for starting the old EFW chemical addition system which has now been abandoned.

Design changes for this modification will occur at the following plant components:

- a) at both motor operated valves ASV-5 and ASV-204
- b) at both terminal boxes AS-1 and AS-9
- c) behind the PSA/EFIC section of the main control board
- d) in auxiliary relay rack cabinets: RR-3A, RR-5B1, RR-PSA
- e) in events recorder cabinet 5
- f) at the secondary cycle sampling analyzer panel SSCP-1
- g) at the 480V water treatment motor control center 38, unit 68
- h) at the 4160V switchgear engineered safeguard bus 3A, Unit 3A3.
- 2. The performance requirements will remain unchanged for ASV-204. The same holds true for the capacity and rating requirements for the valve. The valve is required to open on an EFIC "A" actuation signal. This permits the start of steam turbine driven emergency feedwater pump (EFF-2) to account for the plant configuration change accomplished by the temporary modification to lessen the electrical demand on the "A" emergency diesel generator EDG-3A.
- 3. Code, Standards, Regulatory Requirements and other documents:
  - a) IEEE 323-1974, Qualifying Class 1E Equipment for Nuclear Power Generating Stations.
  - IEEE 344-1975, Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations.
  - c) IEEE 383-1974, Type Test of Class IE Electric Cables, Field Splices and Connections for Nuclear Generating Stations.



Crystal River Unit 3

Sheet 3 of 11

MAR 87-10-09-01A

- d) Code of Federal Regulations 10CFR50, Appendix R.
- e) FPC Calculational Document No. E-87-0001, Revision 0, titled "Addition of ASV-204 to DPDP-8A".
- f) FPC Calculational Document No. E-87-0002, Revision 0, titled "ASV-5 and ASV-204 Power Separation Qualification Review".
- g) FPC Calculational Document No. E-87-0004, Revision 1, titled "Battery 3A size Verification".
- h) FPC Calculation Document E-88-0019, Revision 1, titled "Conversion of Terminal Box AS-9 to a Control Station".
- Vendor Qualification Fackage No. CNTL-G080-02, Revision 0, titled "FPC (General Electric) - Local Control Station (Pushbutton/Indicator Lights), Volumes 1 and 2".
- j) Vendor Qualification Package No. VLV-L200-06, Revision 0, 'titled "Limitorque Model SMB Class H".
- k) Vendor Qualification Package No. CABL-L080-05, Revision 0, titled "Kerite FR/FR Control Cable".
- Vendor Qualification Package No. CABL-K080-06, Revision 0. titled "Kerite HTK/FR Power Cable".
- m) Vendor Qualification Package No. CNTL-N431-03, Revision 0, titled "Nutherm 125VDC Motor Starter" Volumes 1 thru 3.
- n) Vendor Qualification Package No. CNTL-N431-01, Revision 0, titled "Nutherm 125VDC Control Station", Volumes 1 thru 3.
- 4. Valve ASV-204 is required to be powered from a Engineered Safeguard "A" power distribution source. The 250V DC power for the valve is provided from distribution panel DPDP-8A, Fuse 17. The 125V DC control power for manipulating the valve is provided from the same distribution panel and fed from Fuse 15.
- This modification does not alter the design modifications accomplished under the temporary modification T-MAR 87-10-09-01. The design change regarding the seismic integrity of the circuity changes were evaluated under the T-MAR.
- 6. Valve ASV-204 is identified per CMIS as an essential component that is required to support safe shutdown. This modification changes the power and control distribution source requirements for the valve's motor operator (ASV-204-MO). This modification does not change the Code Key Classifications. The component is still required to meet 10CFR50.49

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Crystal River Unit 3

Sheet 4 of 11

- MAR 87-10-09-01A

criteria. CIDP NO. 91012303 dated 01/23/91 has been issued to correct the channel designation form "B" to "A" for the motor starter for the motor operator. This CIDP also updates the document cross reference listing with additional design drawing information. Refer to CR-3 Walkdown Package No. 0042 dated 10/06/89 pages 1 thru 52.

- 7. The design modification implemented under the T-MAR and this permanent modification occur in the control complex on building elevations 108', 124', 134', and 145'. Specifically in the areas of the main control room, CRDM rooms, EFIC Room B, the cable separating room and the 4160V Switchgear Room A. These floor elevations (or areas) are classified as mild environmental areas and the environmental conditions expected are listed on the environmental zone sheets as follows:
  - a) Zone 13, Rev. 4; dated 8/90 titled "Elev. 145 Control Complex, Control Room".
  - b) Zone 43, Rev. 3; dated 8/90 titled "Elev. 95' and 108'- Control Complex".
  - c) Zone 58. Rev. 3; dated 8/90 titled "Elev. 124' and 134'- Control Complex".

Modification changes have occurred in the areas of elevation 95' and 119' of the Intermediate Bldg. The design changes occurred in the vicinity of the steam turbine driven emergency feedwater pump EFP-2. Power and control cables had to be routed from this area into the control complex by utilization of the plant's existing cable tray system. Both floor elevations of the "Intermediate Bldg. are listed as "Harsh" Environmental areas and their expected environmental conditions are listed on environmental zone sheets as follows:

- a) Zone 14, Rev. 5; dated 8/90 titled "Elev. 95' Intermediate Bldg. Emergency Feedwater Pump Room".
- b) Zone 19, 4; dated 8/90 titled "Elev. 95" Intermediate Bldg. HVAC Area".
- c) Zone 20, Rev. 4; dated 8/90 titled "Elev. 95' Intermediate Bldg. Miscellaneous Equipment Area'.
- d) Zone 57, Rev. 5; dated 8/90 titled "Elev. 119" Intermediate Bldg. Personal Hatch Area".

Reference Environmental and Seismic Qualification Program Manual, Rev. 5 dated August, 1990 for determination of zone information.



Crystal River Unit 3

Sheet 5 of 11

REGNAN FAN

. MAR 87-10-09-01A

The following Vendor Qualification Package Reports have been updated to incorporate the design changes initiated by the temporary modification:

- a) VQP CNTL-N431-01, Revision 0, titled "Nuthern 125V DC Control Station", Volumes 1 thru 3.
- VQP CNTL-N431-03, Revision 0, titled "Nutherm 125V DC Motor Station",
   Volumes 1 thru 3.
- c) VQP VLV-L200-06, Revision O, titled "Limitorque Model SMB Class H".
- d) VQP CABL-K080-05, Revision O, titled "Kerite FR/FR Control Cable".
- e) VQP CABL-K080-06, Revision O, titled "Kerite HTK/FR Power Cable".
- f) VQP CNTL-G080-02, Revision 0, FPC (General Electric) Local Control Station (Pushbutton/Indicator Lights)\*, Volumes 1 and 2.
- The design modification interfaced with various plant components and cabinets. Interface occurred at the following locations:
  - a) The PSA/EFIC bench board section of the main control board was changed to add a GE CR2940 selector switch to permit the plant operator to take remote manual control of ASV-204. The bench board had to be reworked to accommodate the switch on the upper half of the EFW "A" channel flowpath.
  - b) Two time delay relays were ad' d in relay cabinet 3A to pick-up the EFIC actuation signal for alarming the opening of valve ASV-204.
  - c) Terminal Box AS-9 was modified to become a local control station for ASV-204.
  - d) The control and power sources to valve ASV-204 which were commonly shared with ASV-5 were separated and assigned to an electrical safeguard channel "A" DC power distribution source. The DC power is fed from Distribution Panel DPDP-8A.
  - e) The 120VAC power supply to the motor starter space heater was disconnected and the actual work was accomplished under Modification MAR 87-03-13-02, FCN's 39 and 42.
  - f) The interlock alarms which interfaces with the EFW chemical addition pump had been spared and the chemical addition pump EFP-3 has been realigned to act morpholine transfer pump. This realignment of pump duty was done under modification MAR 89-04-15-02 and MAR 89-04-15-03.



Crystal River Unit 3

Shoot 6 of 11

MAR 87-10-09-01A

- 9. The power and control cables were furnished from safety related cable inventory maintained at CR-3 site stores. The General Electric control switches selected for installation within local control station (AS-9) are qualified for the harsh environment and documented Report CNTL-G080-02. A General Electric three position selector switch type CR2940US203E was used for the installation on the control board PSA section. Indicating lamps used for valve ASV-204 position status were installed as Drake Gemlite model 5160 series type. Joslyn-Clark 120 VAC time delay relays model type 7313-PMT, were used and located in auxiliary relay cabinet RR3A by the T-MAR. One of these relays is being SPARED and an existing SPARE Clark 125 VDC relay, model 4U8-4, is being utilized in the alarm circuit.
- 14. The electrical source of power for ASV-204 motor operator and control circuitry is supplied from the "A" Engineered Safeguard distribution bus. The motor operator power is 250VDC and fed from distribution panel DPDP-8A, Fuse \$17. The control power is 125VDC and also fed from distribution panel DPDP-8A, Fuse \$15. The motor starter space heater for ASV-204 was supplied from a 120VAC distribution panel ACDP-54, Breaker \$4; however, modification MAR 87-03-13-02, FCN's 39 and 42 disconnected the power feeder to the space heater.

FPC Document No. E-87-0001, Rev. O, titled "Addition of ASV-204 to DPDP-8A", evaluated the design capacity of the distribution panel to accept addition voltage loading and determine if this added load is within the design margin of the distribution panel. Also, another calculation was established to determine that the additional voltage load does not exceed the design capacity of DC Battery 3A. This determination is recorded in FPC Document No. E-87-0004, Revision O, dated 10/20/87 titled "Battery 3A Size Verification". Both engineering calculations have resulted in showing that the added voltage loads are within the design margins of the DC distribution system.

- 15. The physical valve arrangements for ASV-5 and ASV-204 remain unchanged and both valves assemblies are parallel to each other and permit steam admission to the steam turbine driven emergency feedwater pump (EFP-2). Both valves ASV-5 and ASV-204 shared common power sources and control devices to actuate and cause motion of the valves. The commonality between the two was separated and terminal box AS-9 was converted to a local control station. In addition, the control devices located on the lower half of the PSA/EFIC bench section mimic for the steam turbine driven EFF-2 was altered to allow addition of a selector switch for ASV-204. The PSA/EFIC control board mimic arrangement for both emergency feedwater flowpaths were changed to allow addition of the three position selector switch.
- 16. Valve ASV-204 is operational during all plant modes except in plant start-up and shutdown modes where the EFIC actuation signals are bypassed to prevent spurious start of the steam turbine driven EF pump. ASV-204 is



### CONTINUATION SHEET

Crystal River Unit 3

Sheet 7 of 11

PERSONAL PARES

MAR 87-10-09-01A

required to be functional for a loss-of-power event coincident with an ES actuation and a single failure of the 125VDC ES channel "B" power system.

- 17. In the main control room a three position selector switch type GE CR2940US203E with position status lights of red, green and amber has been furnished for remote manual manipulation of valve A5V-204. The control function of the selector switch is such that the control switch must be held in either the open or close position to permit valve travel. Local control station AS-9 has been provided with two pushbutton switches of the model type GE CR2490YA202C and CR2940YA202E and three position status indicating lights of the model type GE CR2940UC212B2, CR2940UC212C2 and CR2940UC212D2. The control circuitry for ASV-204 interfaces with the EFIC actuation signals at the Relay Cabinet RR3A to provide the following system functions:
  - a) A normally open EFIC actuation contact is wired in parallel with the selector switch and the pushbutton switch contacts in the valve's "open" circuit. This contact provides the automatic opening of valve ASV-204 upon and EFIC Channel "A" actuation signal.
  - b) A normally closed EFIC actuation contact is wired in series with the selector switch and pushbutton switch contacts in the valves "close" circuit. This contact provides an interruption to the valves closure signal when an EFIC Channel "A" actuation signal is initiated to open the valve.

Auxiliary relays have been added and identified as Items "TMA" and "TMB" to provide alarm status for ASV-204. These item designations need to be changed since they were not assigned a permanent plant item identifier. Items "TMA" and "TMB" need to be rets ged and relabelled as "DB" and "DA". The 120 VAC time delay relay "DB" will be made SPARE. An existing SPARE 125 VDC relay tagged "H" will be utilized for this alarm separation logic.

19. ASV-204 was added to the auxiliary steam supply system by MAR 80-11-48. The valve was installed to provide the Turbine Driven Emergency Feedwater Pump (EFP-2) with a parallel path (around ASV-5) for providing motive power. ASV-204 was added by MAR 80-11-48 to improve the reliability of the steam supply by providing a redundant path. However, since the pump was considered to be "B train", ASV-204 was powered with "B train" electric power. The power to ASV-204 was changed to "A train" by the temporary MAR T87-10-09-01 which is being made permanent by this MAR. This change provides a potential reduction of dependency on EFF 1 thus reducing loading concerns. This change also increases the reliability of achieving EFF-2 pump start by providing electrically and physically redundant steam supply valves. The "A train" circuits to ASV-204 are separated per the plant separation criteria from the "B train" circuits of ASV-5. The "A train" and "B train" signals to open ASV-204 and ASV-5 originate from redundant sensors and logic channels. Electric power is also fed from redundant, independent sources. A failure evaluation (FPC document E-90-0111 Rev. 0)



Crystal River Unit 3

Sheet 8 of 11

PERMANENTAL

MAR 87-10-09-01A

was performed to demonstrate sufficient independence existed between the "B train and "A train" to prevent simultaneous failure of the redundant trains of emergency feedwater. :

- Temporary Modification THAR 87-10-09-01A was implemented during Refuel 6 to 20. reduce electrical load demand on emergency diesel generator EDG-3A. To achieve this load reduction on EDG-3A, the two parallel steam emission valves (ASV-5 and ASV-204) to the steam driven emergency feedwater pumps were reconfigured to permit the "alves to be electrically powered from two separate distribution sources versus both being powered from the same power source. The Temporary modification accomplished this realignment of power sources by removing auxiliary steam emission valve ASV-204 from the 250/125 volt DC, Engineered Safeguard "B" source to the 250/125 volt DC. Engineered Safeguard "A" source. This effort involved the physical separation of the power and control circuits which were commonly shared between ASV-5 and ASV-204. The temporary modification did not touch the actual valve assembly and it still remains in parallel to ASV-5. Failure Modes and Effects Analysis Document No. E-90-0111, Revision O. titled "ASV-204 Failure Evaluation" demonstrates that no propagated failures can result due to valve assembly ASV-204 and it's electrical circuitry which are still within the vicinity of the "B" side steam turbine driven emergency feedwater pump EFF-2. The analysis shows that no fault or failures could cause impairment of the entire "A" engineered safeguard train due to initiating events on the "B" side.
- 28. Haterial selection has been based on compatibility with as-installed system and existing plant design. Control devices for ASV-204 mounted in control station AS-9 are similar to design configuration of qualified control stations furnished by Nutherm. This similarity in design is documented in VQP #CNTL-GO80-02. Relay "DB", "DA" and "H" located in RR3A are Clark-Joslyn type which are similar in design to other existing relays in RR3A.
- 30. This modification provides for the documentation of cable routings for electrical circuits designated as ASE-34, ASE-35, ASE-36, ASE-37 and ASK-1. The circuits identified are part of the emergency feedwater system which is designated as a safe shutdown system. The circuit paths are routed through the Intermediate Bldg. and the Control Complex and located in the following fire areas/zones:

Fire Area IB-95-200C

Fire Area IB-119-201

Fire Area AB-95-003B

Fire Area CC-134-118A

Fire Area CC-108-108

Fire Area CC-124-117

Fire Area CC-145-118B



Crystal River Unit 3

Sheet 9 of 11

HAR 87-10-09-01A

The fire areas/zones have been determined as listed in the Crystal River Unit 3 Fire Hazards Report No. 03-0920-1103, Revision 3, and visual inspection of Appendix R Fire Area Layout drawings 213-021, Revision 3, 213-023, Revision 3 and 213-028, Revision 01.

- The modification has occurred in fire areas containing safe shutdown equipment.
- b) The modification does not add, delete, or relocate systems, structures, or components into a zone or area where an unprotected opposite train exists.
- c) The modification does not add, delete or relocate non-safety related circuits that share power supplies, signal sources, enclosures and raceways with safety related circuits.
- d) Emergency lighting is not being obstructed or relocated by this modification.

This modification documents the addition of power and control circuits into the exiting plant cable tray system in the above fire areas. The increase in combustible loading does not exceed the maximum permissible loading in each zone.

- 32. FPC Specification SP-5145, Revision 1 titled "Human Factors Design Conventions for the Control Room" was consulted for addition of the control switch for ASV-204 on the bench board of the PSA/EFIC section. This arrangement of the EFW board included the reconfiguration of the EFW pump display of both emergency feedwater flowpath mimics and the pump matrix switches in the area of the EFW pump outrols.
- This modification has an impact on the loading of the Emergency Diesel Generator and the loading evaluation has been addressed and documented in FPC. IOC WPN 966-0434 dated April 15, 1988. This modification has intentions on reducing the continuous duty loading of the motor driven emergency feedwater pump EFP-1 on the electrical load demand requirements for the "A" emergency diesel generator. The modification relies on having the steam turbine driven emergency feedwater pump EFP-2 share the emergency feedwater flow requirements with the motor driven emergency feedwater pump EFP-1. This was accomplished by having the power source for ASV-204 removed (which commonly shared the same power source with ASV-5 from the 250/125VDC, Engineered Safeguard "B" source) and assigned to a 250/125VDC, Engineered Safeguard "A" source. This change permits the start of the steam turbine driven EFW pump (EFF-2) both on a EFIC Channel "A" and Channel "B" actuation signal. Valve ASV-204 is auto-loaded on ES load Block 1.

Valve ASV-204 motor operator previously received 250 VDC power from Distribution Panel DPDP-88, Fuse #5. The 125 VDC control power for ASV-204



Crystal River Unit 3

Sheet 10 of 11

MAR 87-10-09-01A

is previously received from Distribution Panel DPDP-8B, Fuse \$6. The load reduction to this panel is 4520.25 watts. (4462.75 watts of motor operator locked rotor load from Fuse \$5 and 57.5 watts of control power load from Fuse \$6.)

The motor operator locked rotor DC load of 4462.75 watts is being added to Distribution Panel DFDF-SA, Fuse \$17. This load is intermittent duty and auto-loaded onto the "A" EDG. The estimated time of ASV-204 energization is one minute. Reference FPC Document No. E-90-0105, Revision 0 dated 12/11/90 titled "Electrical DC System Revalidation Program DC Master Data Base (G/CI Report \$2851)", Volume 2, Section 1.0, pages DFDFSA17-1 thru DFDFSA17-4.

The control power DC load of 57.5 watts (in-rush) and 25.0 watts (steady-state) is being added to Distribution Panel DPDP-8A, Fuse \$15. The DC load for the in-rush condition is intermittent duty and auto-loaded onto the "A" EDG for a period of one minute. The steady-state load is continuous and also auto-loaded onto the "A" EDG. Determination of the control power electrical loads is based on input data found in FPC Document No. E-90-0105, Revision 0 dated 12/11/90 titled "Electrical DC System Revalidation Program DC Motor Data Base (G/CI Report \$2851)", Volume 2, Section 1.0 pages DPDP8A15-1 thru DPDP8A15-4.

- 38. MOVATs testing is not required since the modification deals with electrical wiring changes and has no affect on the pressure retaining characteristics of the valve.
- 39. The modifications were performed in the following Dominant Area of Concern:
  - a) Room No. CB303 Relay/CRD Switchgear Room
  - b) Room No. CBEFB EFIC "B" Room
  - c) Room No. CB208 4160V Switchgear Room
  - d) Room No. IBO95 EFWP Room
  - e) Room No. CB504 Control Room

An SBO review form has been completed and evaluation by the SBO Reviewer. Valve ASV-204 is identified as a major component required to meet Station Black-out requirements.

40. FPC Documents No. E-90-0110, Revision 0, titled "HELB Evaluation for Valve ASV-204 and FPC IOC NEA90-0991 dated June 9, 1990 have been prepared to assess the impact in the operability of ASV-204 during and after exposure to a HELB event in the vicinity of the steam driven emergency feedwater pump EFP-2.



Crystal River Unit 3

Sheet 11 of 11

BANA MARKA

MAR 87-10-09-01A

- 42. The modification will cost less than \$50,000 based on:
  - 1) the majority of the modification was installed by T-MAR 87-10-19-01.
  - 2) the additional changes to be completed can be installed by less than \$10,000 ... conservatively assuming: (2 men for 1 week) x 2 for paper work times 1.5 for cost increase, and including material.

## EXHIBITS TO THE TESTIMONY OF PAUL F. MCKEE

EXHIBIT No. \_\_\_ (PFM-3)

MAR DOCUMENTATION FOR 1990 MODIFICATION

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#### ENGINEERINGAINSTRUCTIONS CONTINUATION SHEET

Crystal River Unit 3

Sheet 10 of 100

MM . 88-05-24-01

BMEET 2 0F 4

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C.	ESI	erences

- m MAR 87-10-19-61A, MAR 87-07-08-01, MA
- (2)G/Cl Letter PCS \$10419 "System Flows for (3) G/CI telecon memo, C.C. Strempke to Don
- points". G/CI Letter PCS-10125, dated 1-25-39, see (4)
- (8)
- G/CI Letter FCS-9894, dated 11-4-88, conc (6)
- G/Cl telecon memo, C.C. Strempke to "Annunciator windows."
- m G/CI speed meme, ES panels & cabinet sels
- G/Cl Letter FCS-10424, dated 5-16-89, Pur Calculation DC-3515-004-1.07-CS, and DC-(8)
- (9)
- (10) G/CI Letter FCS-10420, dated 4-7-89, s PEAR Transmittal.
- G/CI Letter FCS-18784, dated \$-24-89, revised scope letter. (11)
- (12) G/CI Letter FCS-10814, dated 9-12-89, "EDG loads".
- (13) IOC, M.W. Averett to R.E. Clauson, dated 7-11-88, "Reliability Analysis for the Proposed EFP-1/LPI Logic Modifications.
- (14) B&W Report \$1-117603-00 "Acceptability of a 500 psig start of LPI for all Loss of Coolant Accidents".
- (15) G/C, Inc. Drawings: 201-129, Main Control Board Equipment Cutout Details 201-130, Main Control Board Equipment Cutout Details
- Design GASIS DOCUMENT TEMPORARY CHAUSE NO. 67,686 Engleshof Productive (wet 6/13), Decay Neat Removal Syst (Seat 6/2), Such Expressed Arthropoles, (Seat 6/2), 181 D. Material

Installation Instructions

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- Charge all time and material to NUSSO52401.
- All cable handling, pulling, termination, conduit installation, equipment removal and installation shall be in accordance with applicable FPC maintenance procedures. All relays removed shall be returned to Nuclear Materials Coordinator. -
- De-energise ES system Loop A.
- le. This MAR shall not be made operational until NRC approval for the change has & been received. A new Satety Evaluation will be added & The MAR vie FON ofter NAC approval

- Lodge



#### UNITED STATES EGULATORY COMMISSIO

June 4, 1990

Docket No. 50-302

Mr. Percy M. Beard, Jr. Senior Vice President, Muclear Operations Florida Power Corporation ATTM: Manager, Nuclear Operations Licensing P. O. Box 219-MA-21 Crystal River, Florida 32629

SIAR D	88-	05-	24-01
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Own a .		NA	

Dear Mr. Beard:

N. 2.

SUBJECT: CRYSTAL RIVER UNIT 3 - ISSUANCE OF AMENDMENT RE: EMERGENCY FEEDMATER PUMP AND LOW PRESSURE INJECTION SYSTEM BLOCK/TRIP AND ESF RESPONSE TIMES (TAC NO. 76135)

The Commission has issued the enclosed Amendment No.130 to Facility Operating License No. DPR-72 for the Crystal River Unit No. 3 Nuclear Generating Plant (CR-3). This amendment consists of changes to the Technical Specifications (TS) in response to your application dated February 13, 1990.

This amendment changes the TS to allow elimination of the automatic simultaneous operation of the motor-driven emergency feedwater pump and the low pressure injection system when offsite power is not available, and changes response times for the low pressure and high pressure injection systems.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Harley ACPYer, Project Hanager Project Directorate II-2 Division of Reactor Projects - 1/II Office of Muclear Reactor Regulation

Enclosures:

Amendment Ro. 130 to DPR-72
 Safety Evaluation

cc w/enclosures: See next page

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'OR' 5 6	from B	Block 6 set at 25 s Block EFW set at 5	seconds af:	er EDG break	er closin;
the '4 and EFW po	oad the ET furing ump EFP-1 sering for within its 1.30% to		hanges are		
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SAFETY EVALUATION our and eater applicable decument number: S MAR 80 8.8-0.5-24-0.1 C FCN No. ... □ Precedure No.: HSP 2 1 1 Rev. 0 2 SAPETY EVALUATIONS: Assurer the following questions and provide specific justification (use attachment if necessary). is the probability of an ecourrence or the consequence of an accident or malfunction of equipment important to esisty as proviously evaluated in the Final Balety Analysis Report, INCREASED? □ Yes B No SEE ATTACHED is the possibility for an accident or mailunction of a different type than any previously evaluated in the Final Safet. 2 SEE ATTACHED is the margin of safety, as defined in the basis for any Technical Specification, REDUCED? O Yes E No SEE ATTACHED **10CFR80.50 CHECKLIST** Does the proposed action change the Final Belsty Analysis of or require additional description to be added to the Final Selety Analysis Report? to a Ca age to the Teor C No E Yes C No O Any to any unreviewed eatery querton involved, i.e., O All Yes an cooldant, or mathemation of equipment important to at and rec story provincely evaluated in the Ballety Analysis Report KRC Authorization Decument Change includ for change C Yes (1) Description of change C Re to the presidility for an accident or martunation of a (2) Written Beloty Everys! Reform to IUC NBA 89-1108 deied 10/23/69 different type than any pro-Analysis Report created? which provided bases " nously evaluated in the Safety Items (1), (2), and (3) O Yes C No To E.F. Fronts to the margin of safety, as defined in the basis for any DOWN. Testinical Specification reduced? D Yes PMR 11/8/89 C Description Salety Evaluation Complete elletten et



### ANALYSIS / CALCULATION Crystal River Unit 3

Sheet 3 of 21

601/8040 MADES

88-05-24-01

RE# 1:/81

PROJECT

DHP/EFP ES START MODIFICATION

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This logic limits operation of the LPI and EF pumps to their designed accident scenario. The EF pump functions during a small break LOCA to remove RC system heat while the HPI system provides the necessary makeup water to the RC system to maintain core coverage. During the large break LOCA, the coolant is lost through the break at a rate greater than the HPI pumps capacity. This accident relies on the LPI pumps to maintain core coverage and cooling.

This modification does not change the piping configuration of equipment operating conditions during startup, shutdown, normal power generating modes. Therefore, the probability of an occurrence as previously analyzed in the FSAR is not increased.

Equipment operation for secident mitigation is changed by this modification however, equipment function remains unchanged. During a small break LOCA, the LPI pumps currently start and run in a recirculation mode. This is because the RC pressure remains above 560 psig. The FSAR accident analysis; therefore, cannot take credit for any cooling from LPI pumps. During a large break LOCA, circulation through the OTSGs cannot be maintained; therefore, the steam generators quickly lose heat transfer capability and the EF system cannot remove RC heat. The EFIC system currently will cause the EF pumps to go to a recirculation mode of operation since steaming in the OTSGs coes not occur. The FSAR analysis; therefore, does not take credit for EF system cooling.

An intermediate size LOCA will rely on both the LPI and EF systems to provide core cooling. However, as identified above, cooling from both systems is not required concurrent. Therefore, the accident evaluation in the PEAR will still provide the bounding case after this addition is completed.

FSAR Sections reviewed are 6.0, 7.0, 8.0, 9.0, 14.0.

- 2. Accidents or system failures other than those evaluated in the PSAR are not introduced, since it is the pump logic after the accident has occurred which is changed. Malfunctions in the pump logic can occur, but these do not result in an unanalyzed scenario since it is designed to the same standards as the original logic. Since this is part of a protection system the following criteria of IEEE 279 have been applied to the ESAS which initiates the new logic:
  - Single Pallure Criterion Redundant independent actuation channels are provided such that a single failure will not prevent actuation at the system level.

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#### ANALYSIS / CALCULATION Crystal River Unit 3

Sheet 4

88-05-24-01

#### DHP/EFP ES START MODIFICATION

2. Quality of Components - Components are specified and procured through a 10CPR\$0, Appendix B program.

Equipment Qualification - Components are qualified in accordance with

applicable requirements of IEEE344-1971.

Channel Integrity - Protection system channels are designed and procured to function under anticipated extremes of environment, energy supply, malfunctions, and accidents.

Channel Independence Redundant channels are independent and physically

separated from each other based on plant separation criteria.

Control & Protection System Interaction - Control and protection systems are maintained independent to prevent interaction which could cause failure of the protection system.

7. Derivation of System Inputs - Protection system inputs are provided by

direct measurement of the desired variable.

Capability For Sensor Checks - Sensor checks can be performed by cross checking between channels.

Capability For Test And Calibration - Capability for testing and calibrating

of channels during plant operation is provided.

Channel Bypasses - Two out of three logic is used for protection channel actuation. This enables the capability to remove a channel from operation for testing and calibration.

- Operating Bypasses Operating bypasses are designed such that the bypass 11. will be automatically removed whenever the permissive conditions are not met. Manual bypasses are indicated to the operator. Automatic bypasses are not used.
- Indication of Bypasses Bypasses are indicated by status lights and annunciator.
- 13. Access to Means for Bypassing - \* ccess to bypasses is provided on the Main Control Board.
- Multiple Setpoints Different setpoints for particular modes of operation are not used.
- Completion of Protective Action The system uses "seal-ins" to assure that 15. once initiated actuation at the system level will go to completion.
- Manual initiation Manual actuation at the system level is provided via 16. switches on the Main Control Board.
- Access To Setpoint Adjustments Setpoint adjustments require access to 17. locked system cabinets.
- Identification Of Protective Actions Protective actions are indicated by 18. ES status lights.
- 19. information Read-Out - The system is designed with sufficient visual displays to permit timely evaluation of system status by the operator.



### ANALYSIS / CALCULATION

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88-05-24-01

PRODUCT

DHP/EFP ES START MODIFICATION

 System Repair - The system is designed to facilitate recognition, location, replacement, repair, or adjustment of malfunctioning components.

FSAR Sections 6.8, 7.8, 8.8, 9.8, 16 reviewed.

3. The operating time, of equipment is maintained in the analyzed range. However, the sequence loading of the LPI pumps has been changed from 25 seconds to 35 seconds including Emergency Diesel Generator loading. This is still within B&W analyzed time per B&W Calc. 51-1172948100.

Technical Specification sections reviewed are 3.5.2, 3.5.3, 4.5.2, 4.5.3, and 3/4.3.2.



Watter & Wilgus

July 22, 1988 3F0788-18

Document Control Desk U.S. Muclear Regulatory Commission Washington, D.C. 20555

Attention: S.A. Varga

Subject: Crystal River Unit 3

Docket No. 50-302

Operating License No. DFR-72

Ray Projects Status

#### Dear Siri

In recent discussions I became aware that you have not been formally updated on several key subjects. Subsequent conversations among our respective staff identified four key issues which warranted an update prior to our August 16 meeting(s). Attached are detailed discussions of three of these issues (Additional Feedwater Pump, Emergency Discal Generator and Ultimate Heat Sink). The fourth, ATMS, is the subject of a NAW Corners Group meeting next week. Fellowing development of a consensus among the Commers a meeting with the Staff will be held to assure timely electron of the issues not accepted in the Staff SER. FFC has initiated design efforts on accepted in the Staff SER. FFC has initiated design efforts on the balance of the system in a good faith effort to support Refuel VII installation if the issues can be reselved.

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Not +: Additional Feedwater Pump and Ultimate Heat Sink Attachments are not part of MAR 88-05-24-01, therefor, are not included in Safty Evaluation.



July 22, 1988 370788-18 Page 2

I am confident the attached highlights FPC's afforts to move ahead expeditiously on these key issues. We look forward to discussing these with you and your staff in the coming weeks.

Sincerely,

W.S. WINGO

Vice President Nuclear Operations

WSW/IDW/God Attachment

NO: Regional Administrator, Region II

Senior Resident Inspector

**EMERICALIST** TREET GENERATOR LOADING Strong

- 20.05.24.v

On Harch 30, 1988, FPC met with the NRC staff to diesel generator leading concerns at CR-3. FPC ETW pump block/trip design concept that would issue. FPC would like to re-confirm that i block/trip medification during Refuel VII which is for the Fall of 1989. The senceptual design of the completed by Hovember, 1988 and submitted to the TO alsomes the asservancy for presented a proposed of resolve the EDG load it will install this a is currently scheduled this sedification will the sedification will be the MRC at that time. discuss. g

the MRC requested dissel generator ( A May requested answers to four issues (a - d) reparding with FPC, requested answers to four issues (a - d) reparding emargency generator (EDG) loading. A similar request for information on sues (1 - S) was contained in a May 36 letter to FPC. This responds to those concerns. Responses to similar comments two letters are grouped together to avoid repetition.

During certain events, both the ETW and for plant control in the long-term general, the question of long-term need in an accident should be addressed. recirculation mode. In for loads not needed early

RESPONSE: March 10 seeting. The study extended the previously seven days, including consideration of long term support leading during the 7 day post accident scanarios out to leading during the 7 day post accident partied to be less review by FPC and Saw. The report is currently under high pressure injection during the report is currently under injection. The EDG leading during the recirculation phase of injection phase of injection is below its 30 minute rating during the recirculation phase of injection is below its 30 minute rating for the "B" EDG seature case because the curbine driven emergency feedwater pumps (ETP-2) can be utilized and sover driven pump (ETP-1) operation of the motor driven emergency feedwater pumps the motor driven emergency feedwater pumps. This slae reduced due to shared flow with the "B" EDG leads from the Muclear Services Closed Cycle Cooling and train pumps. This slae reduced due to shared flow with the "B" services closed Cycle Cooling and train pumps. The current scandale for finalization of the september 1 services closed Cycle Cooling and train pumps. The current scandale for finalization of the september 1 services closed of the below the 10 the september 1 services closed of the submitted by study of the leng

The proposed long-term solution control system may pose additional risk or problems in more likely scenarios. The reliability of the Engineered Safeguard Peatures (ISF) system should be addressed to assure that failures which could prevent operation of EFW or DH removal are not made more likely, and that defeating a safety

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function (i.e., EPW) will reliability. The adequacy be examined. 200 two-out . . chree B BABU ... ificant ant effect or 8 PLSO ESP

RESPONSE: pressure injection (LPI) actuation logic provides for starting LPI on either less than 500 psig Reactor coolant System (RCS) pressure or greater than 4 psig Reactor coolant System (RCS) pressure when off-site power is available, but modifies the logic to start on only 500 psig RCS pressure when the EDG is supplying power. In addition, when the EDG is supplying power, the proposed change will prevent the motor driven emergency feedwater pump from starting automatically and/or trip it if it is operating upon an ES actuation where off-site power is available the emergency feedwater pump will not be affected by the 500 psig RCS pressure. For psig RCS pressure ES actuation.

The existing IS Actuation System logic is based on a two out of three redundancy for reliability and testability. The system is powered from vital power supplies and is designed as de-energise to actuate on the two out of three level, while within the redundant train logic it is energise to actuate to preclude power failures from causing actuation.

The above changes provide the loading intelligence to preclude the automatic operation of both the motor drive emergency feedwater pump and the LPI pump, thus the ED loading is maintained below its 30 minute rating. It addition, the proposed modification provides the following: intelligence to

- Like the existing CR-3 LPI/EFW actuation char FSAR Section 7.1 Prof failure, on-line tas operational bypasses. CR-3 ES Actuation System, the proposed changes will meet all requirements of Protection Systems, including single testability, status indication and
- Þ The smarqency feedwater started within the safety when either off-site pow available. Inned pump and the analysis timing ar or on-site ; y specifications
- ņ signal diversity is maintained in its present configuration for accidents where off-site power is available. The diversity is reduced only in the starting of the LFI pump on on-site power. Since loss of off-site power concurrent with an intermediate or large break LOCA is an extremely low probability event, diversity of actuation for this combination of events provides little added protection.

41.05.7

d. Human factor principles are maintained by not introducing new controls and using the same actuation logic design for both actuation trains.

Analysis of the preliminary design was done using probabilistic risk assessment (PRA) techniques. This analysis shows that the additional circuitry will have a negligible effect on the overall reliability of the motor driven emergency feedwater pump train. A major reason this impact is negligible is that the circuitry is enabled only when the "A" EDG output breaker is closed. Thus, the possibility of inadvartant actuation is eliminated any time the EDG is not running. In addition, the changes to the LPI actuation parameters have a negligible effect on the overall reliability of the LPI trains. The reason for this, like that above, is that diverse actuation is removed only when the EDG output breaker is closed.

- Currently, the Low Pressure Injection System is initiated by diverse signals, namely 4 psig containment pressure or low RCS pressure. In the proposed design, only the latter is used. The use of an appropriate diverse signal should be addressed.
- RESPONSE: The present design utilizes a 4 psig RB pressure as a diverse actuation signal for LPI. This logic provides an anticipatory actuation in the event of a large or intermediate LOCA. However, it is an unnecessary initiation which results in operation of both LPI and EFW pumps for other accidents such as small break LOCA's or steam and feedwater line breaks. The following options have been considered for maintaining diversity without the anticipatory nature of the 4 psig signal:
  - a. Maintain the 4 psig signal on "B" train only.

This approach was discarded on the basis of poor human factors.

b. Actuate LPI on RB pressure of 30 paig.

This approach was not considered viable because of uncertainty in the calculation of passive heat sinks and RB cooler heat removal capabilities. This reduces confidence of the correlation to an RCS pressure of 500 psig (i.e., greater than expected heat removal capability could preclude reaching the 30 psi setpoint during the larger LOCA's).

c. Disable the 4 psig signal when off-site power is not available.

Diversity provides protection against common mode

4.05.24.01

failures. This protection is most beneficial for high probability events. Intermediate and large breat LOCA, combined with loss of off-site power, are low probability events.

Since the diesel loading concern occurs only during a loss of off-site power concurrent with an intermediate or large break LOCA, diversity of actuation for this combination of events provides little added protection and could be removed.

The proposed modification maintains the 4 paig RB pressure diversity at all times except when the EDG output breaker is closed.

- The battery charger and other loads as appropriate should be added back on the EDG.
- RESPONSE: FPC agrees and intends to add the battery charger loads back on the EDG. The design of the modification will be completed by October 1988. When the EFW/LPI block/trip modification is installed during Refuel VII, the automatic tripping of the "A" battery charger will be eliminated. The tripping of the heat tracing will be retained. This load can be reapplied by the operator if needed.
- 5. Although the proposed long-term solution is conceptually acceptable, the EDGs would not have a desirable capacity margin, particularly with the return of loads previously removed. You have indicated that one group of EDG upgrades will be implemented by the next refueling, and that others are being considered. The capacity benefit of these upgrades and of those you propose to implement should be addressed.

RESPONSE: FPC response to this comment is in the section of this submittal entitled Emergency Diesel Generator Capacity Upgrades.



### MAR TRANSMITTAL MEMO INTEROFFICE CORRESPONDENCE

Operations Engineering Dist. 11/2/89 SUBJECT: Crystal River Unit No. 3 Project Title DHP/FFP FT Start Modification To: Nuclear Projects Superintendent Crystal River No. 3 Attached is the completed and approved design package for the subject MAR. NRC approval for this change is required before it is made operational. A new Safety Evaluation will be added via FCN at a later data. "THIS MAR AFFECTS EDG LOADING" 11/9/89 NOE Clark withings only Muci. Ops. Schod. Analyst Mgr., Nucl. Fuel Mgmt and Balety Analysis Mgr., Site Nucl. Engrg. Serv. wrattach and exps Mgr., Nuc. Licensed Oz Tr. wrattach and pwgs. Mgr., Nuct. Engrg. Assurance wiattach, we sets Mgr., Nucl Plant Bys. Eng. wrattech. Fire (REVMAR) wistisch; wio dwgs. Supervisor, SNES - Environmental Qualification Micromedia w/Engrg. Instructions & orig. engs Mgr., Nuc. Procurement Eng. Services Drafting and CADD Section erSection & of wrettach and dwgs M Yes Engrg. matructions Buponisor, SNES - Field Engineering Nucl. Proj. Super, erlorig. & 7 copiest: erf5 sets ewgs. P.M. Rubio CR-3 Document Control wisttach; 46% R.E. Clauson, w/Eng. Inst. & Dwgs. Nucl. Train. Control Supv. (NULT) wrottech: 14'S A. Petrowski, w/Eng. Inst. & Dwgs. Gitters/Commonwealth w/l are and Sec. B. of G. B. Poore w/attach, w/o Dwgs . Eng. Ingt. **Nuclear Operations Engineering Supervisor** Babcock & Wilcox wrt are and Boc. B. of Eng. met. Electrical, w/attech & Dwgs. Impell will are and Sec. B. of Eng. snst. texcept B&W R. Merckese, w/attach & Dwgs. Grawings) wellach and dwgs. Mer., Nucl. Config. Mgmt. wrattach. and dwgs. RECEIPT OF DOCUMENTATION -88-05-24-01

Return to: Power Plant Engineering Services Dec

II Control, C2E, St. Petersburg, Flends

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# REGULATORY/ENVIRONMENTAL REVIEW

	Does this modification or document revision change what is idescribed in any of the following plans/programs? If unable to idescribed in any of the following plans/programs? If unable to idescribed in any of the following plans/programs? If unable to idescribed in any of the following person designated below.  Cuality Program Description (PBAR Section 1.7)  Contact: Director, Quality Programs  Licensed Operator Requalification Program (PBAR Section 12.2.3.4 and Appendix 12 C)  Contact: Manager, Nuclear Operations Training  Modified Amended Security Plan  Contact: Manager, Nuclear Licensing  Baleguerds Contingency Plan	□ Yes	El No
	Cuality Program Description (PBAR Section 1.7) Contact: Director, Quality Programs Licensed Operator Requalification Program (PBAR Section 12.2.3.4 and Appendix 12 C) Contact: Manager, Nuclear Operations Training Modified Amended Security Plan Contact: Manager, Nuclear Licensing Safeguerds Contingency Plan	D Yes	El No
	Licensed Operator Requalification Program (PSAR Section 12.2.3.4 and Appendix 12 C) Contact: Manager, Nuclear Operations Training Modified Amended Security Plan Contact: Manager, Nuclear Licensing Safeguerds Contingency Plan		E No
	Modified Amended Security Plan Contact: Manager, Nuclea: Licensing Safeguards Contingency Plan	□ Yes	
	Safeguards Contingency Plan		CF HO
	Contact: Nuc. Security & Special Project Superintendent	□ Yes	D No
	Security Guard Training and Gualification Plan Contact: Nuc. Security & Special Project Superintendent	D Yes	O No
	Radiological Emergency Response Plan Contact: Manager, Site Nuclear Services	□ Yes	E No
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•	Contact appropriate responsible person identified above to perform the evaluation and attach. The evaluation must be approved by the Division Head responsible for the plan/program.	Evalue D Comp	
b.		D Comp	
2. Br	refronmental Proteotion Plan Review	11135	313 75,1733
4	Could this change affect the environment in a non-radiological way?	□ Yes	OF No
	If "yes," contact the Manager, Nuclear Licensing.	□ Come	
b.	그 그리고 있는 것은 경우를 가지 않는데 가게 되었다. 얼굴에 가장 살아가는 그 그리고 있는데 그리고 있다. 그리고 있는데 그리고 있는데 그리고 있다.	□ Yes	□ No
	must also be made to the Manager, Nuclear Licensing.	O Submit	tied P N/A
	EPA and/or FDER approval received, if needed, and attached.	□ 7es	10/160
2. Re-	New for change to Radiosottre Waste System CPR 80.34s and Appendix I / T. S. 6.16.1.1)		
Wil	I this change to a radioactive waste system (liquid, gaseous or id) result in an increase of radioactive material released to the frenment?		_
	yes", submit change to Manager, Nuclear Licensing to evaluate	□ Yes	D No
ung	reporting requirements.	□ Submit	ted E NA
ALL OF	above are checked no, no further reviews are require	ED.	
	3		





TO: Nuclear Safety Supervisor

		,		
A copy of NAR \$8-05-2	4-0/ FCII	1s atta	ched for your	
review of the MAR Safety	Evaluation for Toch	nical Specificati	an Conformence	
and Unreviewed Safety Imp	ications.			
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* ACCEPTABLE				
	5-05 NOV NO 20			
UNACCEPTABLE	Return immediate	ly to the MAR Off	ice for resolution	
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MPP-102

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Page 11





ENCLOSURE 7 (Page 1 of 7)

### SETPOINT CHANGE/PROCESURE REVISION VERIFICATION (PART A)

FCII
FCN is routed to you for your review to deter- is existing or proposed within your area of 11 need to be revised upon completion of this
ON TO THE PROJECTS DEPARTMENT (MAIR) UPON OF DEMOT ROUTE TO THE MEXT PERSON ON THE LIST.
VES PROCEDURE CHANGES ARE REQUIRED
ES N/A THIS MAR/FCM REQUIRES TURNOVER TO OPERATIONS IN ACCORDANCE WITH MPP-107. (N/A FOR FCM REVIEW UNLESS THE MAR HAS ALREADY BEEN TURNED OVER TO OPERATIONS OR
PRIOR TO MAR TURNOVER TO OPERA- TIONS. (LIST 0)  SEE ABOVE.
PATIONS INC TO ENGINEERY
EXT. 4196 DATE 12/4/89





### SETPOINT CHANGE/PROCEDURE REVISION VERIFICATION (PART A)

MATE !							
	NUCLEAR PLAN SYSTEMS ENGINEERING	π	80	X YES	PROCEDURE (LIST 0)	SP-130 6	P-136A.B.C
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IAZG N	UCLEAR ISI PECIALIST	_ NO	— 110 — YES	YES	PROCEDURE (LIST 0) PROCEDURE PRIOR TO M OPERATIONS	CHANGES ARE CHANGES ARE AR TURNOVER	REQUIRED
IAZG N	UCLEAR ISI PECIALIST	_ NO	— 110 — YES	YES	PROCEDURE (LIST 0) PROCEDURE PRIOR TO M OPERATIONS	CHANGES ARE CHANGES ARE AR TURNOVER	REQUIRED
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### SETPOINT CHANGE/PROCEDURE REVISION VERIFICATION (PART A)

NKJA	NUCLEAR CHEN/RAD PROT. SUP	7.	#0 .	YES	PROCEDURE CHANGES ARE REQUIRED (LIST 0)
		NO	YES _	N/A	PROCEDURE CHANGES ARE REQUIRED PRIOR TO MAR TURNOVER TO OPERATIONS.
COMMENT					
PRI					DATE
NAZE	NUCLEAR SECURITY		110 _	YES	PROCEDURE CHANGES ARE REQUIRED (LIST 0)
		110	YES _	_ R/A	PROCEDURE CHANGES ARE REQUIRED PRIOR TO MAR TURNOVER TO OPERATIONS.
PRINT					DATE

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### SETPOINT CHANGE/PROCEDURE REVISION VERIFICATION (PART A)

NAIB NUCLEAR PROJECTS SPECIALIST \_\_ NO \_\_ YES

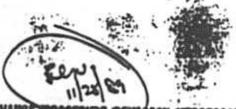
VES PROCEDURE CHANGES ARE REQUIRED AND ARE IDENTIFIED.

MPP 107

Rev 6

Page 17







# SETPOINT CHANGE/PROCEDURE REVISION VERIFICATION AND PREVENTIVE MAINTENANCE UPDATE (PART B)

C c.	
MAR 88 - 05 - 24 - 01 - FO	
INSTRUCTIONS: The attached MAR/FCN is routed to mine if procedures existing or pr responsibility will need to be re modification.	
RETURN THIS FORM TO THE PROJECT COMPLETION OF YOUR REVIEW. DO ON THE LIST.	S DEPARTMENT (MAIB) UPON NOT ROUTE TO THE NEXT PERSON
SITE NUCLEAR NO YES PROCEED (LIST SERVICES (ENVIRONMENTAL QUALIFICATION)	EDURE CHANGES ARE REQUIRED
Please indicate any EQ (10CFR50.49) re incorporated into the MPs/PMs upon com	quirements which must be
PRINT NAME SEMECANO FOR V3	224
PRINT NAMEEXT. 43	02 DATE 12/16/89
NRIC NUCLEAR Y NO YES PROCEST (LIST SPECIALIST	DURE CHANGES ARE REQUIRED
Y NO YES PREVE	TATIVE MAINTENANCE CHANGES
PRINT NAME RHY LIVER EXT. 47	DY DATE 1/8/96



# SETPOINT CHANGE/PROCEDURE REVISION VERIFICATION AND PREVENTIVE MAINTENANCE UPDATE & (PART 8)

	NAZH NUCLEAR FIRE PROTECTION SPECIALIST	NO YES	PROCEDURE CHANGES ARE REQUIRED (LIST 0)
_			DATE
	NA2F NUCLEAR SAFETY AND RELIABILITY	X NO _ YES	PROCEDURE CHANGES ARE REQUIRED (LIST 0)
		egt Suite en	. 4477 DATE 1-12-90
-	OTHERS:	NO YES	PROCEDURE CHANGES ARE REQUIRED (LIST 0)
	PRINT NAME	EXT.	DATE
-		NO YES	PROCEDURE CHANGES ARE REQUIRED (LIST 0)
	PRINT NAME	EXT.	DATE

MAIB MUCLEAR PROJECTS SPECIALIST

WES PROCEDURE CHANGES ARE REQUIRED AND

PRINT NAME \_\_\_\_\_ M:He Javas

EXT. THEY DATE \_\_\_



## DESIGN DATA SHEET Crystal River Unit 3

_			DIP/EFP ES START MODIFICATION	ES				
M	EIT	CH	E:   Electrical   I & C   Mechanical   Structural  RITERIA:   Safety List System  Safety Classification Review Form (attach copy)  LATED:   Yes   No					
	700	800	APPLICABLE DESIGN INPUT REQUIREMENTS					
2.	9	000	Performance requirements such as capacity, rating, system output.  Codes, standards, and regulatory requirements including the applicable issue addenda.					
5.	2	000	Loads such as seismic, wind, thermal and dynamic	on such as nuclear licability —				
	E		Interface requirements including definition of the functional and absolute latest					
	E	0	arrowing structures, systems and components.					
			Mechanical requirements such as vibration atmost shock and meeting to					
		Ð	William Individual Constitution of the Constitution of the Constitution and the					
		0	pressure drops, and allowable fluid velocities	able				
	T 4	Ð	Chemistry requirements such as provisions for sampling and limitations on wat chemistry.					
i			Electrical requirements such as source of power, voltage, raceway requirements insulation and motor requirements.					
1			Layout and arrangement requirements, to include potential adverse affects of n seismically qualified masonry walls					
1			Operational requirements under various or iditions such as plant startup, normal operation, plant shutdown, plant emergency operation, special or infrequent operation abnormal or emergency operation.	al plant pration, and				
2		_	Instrumentation and control requirements including indicating instruments, con alarms required for operation, testing, and maintenance. Other requirements su type of instrument, installed spares, range of measurement, and location of indishould also be included.					
		0	Access and administrative control requirements for plant accounts					
Ē		_	recondency, diversity and apparetion requirements of statetums					
E		_	The state of the s	A definition				
E			of those events and accidents which they must be designed to withstand. Test requirements including in-plant tests and the conditions under which they performed.					
E			Accessibility, maintenance, repair and inservice inspection requirements for the					



#### DESIGN DATA SHEET Crystal River Unit 3.

SHEET 2 OF 2

MAR 88-05-24-01 APPLICABLE DESIGN INPUT REQUIREMENTS: (Continued) 22. Personnel requirements and limitations including the qualification and number of personnel available for installation, plant operation, maintenance, testing and inspection as they pertain to permissible personnel radiation exposures for specified areas and conditions. 23. Transportability requirements such as size and shipping weight, limitations, I.C.C. regulations. 24. Fire protection or resistance requirements: (Check applicable letter(s)) a. Changes or additions/deletion of fire detection/suppression systems or equipment. b. Changes or additions to the plant configuration that change the effectiveness of existing fire detection/suppression systems. Handling, storage and shipping requirements, include equipment protection requirements for in-place storage or system lay-up as applicable. 28. Other requirements to prevent undue risk to the health and safety of the public. 27. 🗊 Materials, processes, parts and equipment suitable for application. 28. Safety requirements for preventing personnel injury including such items as radiation hazards, restricting the use of dangerous materials, escape provisions from enclosures, and grounding of electrical systems. Addition or relocation of safe shutdown equipment, systems, components, or circuits that 29. £ require compliance with the separation criteria stated in 10CFR50, Appendix R. 30. 🗆 The modification will modify an item that: (Check applicable letter(s)) a. was originally procured and installed in an unmodified state and for which spare parts are stocked; or, b. is being procured as a part of this modification and will be modified after receipt; or, C. Is currently in inventory (FIMIS) in an unmodified state and will be modified prior to installation and/or restocking C d. will be completely or partially replaced by an item of different design or materials. If "Yes" to any of the criteria, forward a completed copy of the MAR to the Manager. Nuclear Procurement Engineering Services. The modification adds or relocates control nom equipment entailing direct operator interface that requires Human Factors design review per the criteria stated in NUREG-0700 and/or adds, deletes or modifies any other equipment which could affect the characteristics of plant operation as displayed to the plant operator.

(Ref: FPC Specification SP-5145) 32. The modification represents a replacement which is governed by ASME Section XI. 33. E

The modification involves additions and/or deletions to EDG loading. 34. High Energy Line Break (HELB) design requirements.

35. The modification will delete or modify inputs to the Safety Parameter Display System (SPDS).

36. g The modification involves a location classified as a dominant area of concern (DAC) for Station Blackout Equipment (SBO). If "Yes," forward a completed copy of the MAR to the Nuclear Engineering Supervisor, Electrical.

37. The modification will affect exterior physical structures in the protected area and/or within 20 feet outside the protected area.



### DESIGN INPUT RECORD Crystal River Unit 3

Sheet 1 of 18

							 2 01 20
REY FRANK BUANGER	88-05-	24-01	☐ Electrical	X ISC I		Mechanical	Structural
Property : (Foogotted for pa	upo anno amily)	DHP	EFP ES START	MODIFICAT	ON		

1. Emergency Diesel Generator (EDG) load espacity limitations have made it necessary to medify the Engineered Safeguards (ES) loading sequence to maintain the EDG loads below the 3800 kW, 2800 hour rating. During a March 38, 1983 meeting with the NEC, FPC presented a proposed EFW pump block/trip design concept which would resolve the loading concerns. This meeting was followed by Letter 3F0788-18 on July 22, 1983 and a subsequent meeting on August 16, 1988. In a September 32, 1988 letter to the NEC (3F0988-22), FPC advised that the ES actuation logic would be changed to prevent simultaneous actuation of the emergency feedwater and low pressure injection pumps. This medification implements the ES logic change based on the Conceptual Design forwarded by FCS-9884 (November 4, 1988), FPC's request for scope letter, G/CI #2521 (December 30, 1988), and the revised scope per FPC's request per FCS #10784 (August 24, 1988).

Specifically, the modification precludes simultaneous actuation of both the EFP-1 and DHP-1A, based on a 500 psi Reactor Coolant System pressure and create the following ES load blocks:

#### Load Block 1

High Pressure Injection Pump MUP-1A (MUP-1B)
Miscellaneous MCC Loads And Motor Operated Valves
Inverters
Control Complex Lighting
Miscellaneous AC Distribution Panels
Transformer
Battery Chargers
Emergency Lighting

#### Load Block 2

Reactor Building Fan AHF-1A (AHF-1B)
Emergency Nuclear Services Seawater Pump RWP-2A (RWP-2B)
Flush Water Pump DOP-2A (DOP-2B)

#### Load Block 3

Emergency Nuclear Services Closed Cycle Cooling Water Pump SWP-1A (SWP-1B)

Decay Heat Closed Cycle Cooling Fan AHF-15A (AHF-15B)

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Crystal River Unit 3:

Sheet 2 of 10

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88-05-24-01

#### EF Block

Motor Driven Emergency Feedwater Pump EFP-1A.

#### Load Block 4

Decay Heat Removal Pump DHP-1A (DHP-1B) permissive.

#### Load Block S

Decay Heat Seawater Pump RWP-3A (RWP-3B).

#### Load Block 6

Decay Heat Closed Cycle Cooling Water Pump DCP-1A (DCP-1B) Reactor Building Spray Pump BSF-1A (BSP-1B) permissive.

The basic function of the Engineered Safeguards (ES), the Decay Heat System, and the Emergency Feedwater (EFW) system is not changed due to this MAR. However, the systems is modified as follows:

- a. The ES actuation matrix for starting the LPI pumps (DHP-1A and DHP-1B) is changed from a 1500 psig Reactor Coolant (RC) pressure to a 500 psig RC pressure energise to trip.
- b. The ES 4 psig Reactor Building (RB) pressure diverse actuation signal for LPI pump start remains when OFFSITE-POWER exists. However, the 4 psig RB signal is blocked from starting the LPI pumps when offsite power is unavailable.
- c. The ES actuation matrix for sequence starting the Decay Heat Closed Cycle Cooling pumps (DCP-1A and DCP-1B) is moved from Block 4 to Block 6. Block 6 is set to start at 25 seconds.
- d. The ES actuation permissive matrix for sequence starting the Reactor Building Spray pumps (BSP-1A and 1B) is moved from Block 5 to Block 6. Block 6 is set to start at 25 seconds.
- e. The ES actuation matrix for sequence starting the Raw Water pumps (RW-03A and 03E) is moved from Block 4 to Block 5. Block 5 is set to start at 20 seconds.

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Crystal River Unit 3

Sheet 3 of 18

GET / BAAR MARKETON

88-05-24-01

- f. The ES actuation permissive matrix for sequence starting the LPI pumps (DHP-1A and 1B) is moved from Block 1 to Block 4. Block 4 is set to start at 15 seconds.
- g. The Emergency Feedwater motor driven pump (EFP-1) has a dedicated ES sequence start matrix to start 5 seconds after EDG loading on Loss of offsite power (Loop) without ES actuation and 5 seconds after Block 3 loading with ES actuation. If an ES condition occurs after LOOP the EFP-1 is tripped and re-sequenced. If the ES condition is a LOCA that allows EC pressure to decrease below 500 psig with a LOOP event, EFP-1 is tripped due to LPI pumps starting. There is no EFP-1 trip function during non-LOOP events.
- h. The ES status lights for actuation and testing of the above items (a) through (g) is re-arranged as necessary on the ESF section of the main control board, and ES relay cabinets, actuation cabinets, and test light panel.
- I. The manual ES actuation of LPI will not cause automatic start of DHP-1A and DHP-1B pumps until HPI is either automatically or manually ES actuated to properly sequence load the pump by the ES sequence timing permissive matrix.
- The manual actuation of LPI with a LOOP will trip EPP-1.
- The performance requirements of the ES, DC, DH, BS, RW, and EF systems have not changed from the original plant installation due to this MAR.
- 3. a. IEEE 279-1968, Criteria for Protective Systems for Nuclear Power Generating.
  - b. 19CFR50 Appendix R, Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1978.
  - c. SP-\$145, Human Factors Design Conventions for the Control Room.
  - d. Control Board and Relay Rack ES Separation Criteria Report for Crystal River Unit 3, May 18, 1972.
- 4. This MAR does not affect the design conditions of the fluid process for the BS. DC, DH, RC, RW, or EF systems. Voltage for ES status lights on the MCB shall be 25 V. Status lights in relay panels shall be powered from their control circuits. Power supplies for control circuits shall be 125 V DC or 129 V AC.

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Crystal River Unit 3

Sheet 4 of 18

ACT / MALE RUNNINGS

88-05-24-01

S. The additional status lights and cut-out holes in the ESF section of the Main Control Board have been reviewed and by engineering judgement have negligible effect on the seismic static loads. The additional test lights, relays, and relay contacts to be located in the ES actuation cabinets have been reviewed and by engineering judgement have negligible effect on the seismic static loads.

Relays added for this MAR shall be the same as currently used in the racks to assure seismic operability.

- All equipment medification and wiring occurs within the mild environment of the Control Building EQ Zone 13. 10CPR\$0.49 does not apply.
- This modification interfaces the BS, DC, DH, ES, EF, and RW systems. The ES
  actuation matrices are being modified for pump sequence loading and for LPI
  actuation and EFW pump EFP-1 trip.

EFP-1 is loaded 5 seconds after EDG Breaker Closure upon Loss of Offsite Power without ES actuation. The EFW turbine driven pump (EFP-2) is unaffected by this modification. No modification is being made to the EFIC system for actuation logic and control.

MAR 87-07-08-01 "ES Matrices Bypass Status Lamps", MAR 87-10-06-01 "Application of ES Clark Relays", and MAR 87-07-06-01 "BS Pump Testing Circuit" interfaces with this modification.

- Additional relays and relay contacts shall be similar to and compatible with existing relays. All wiring shall be from existing, approved site stock and will be installed in the control building.
- 13. All control wiring shall have 600 volt insulation. Status light wiring may have 300 volt insulation. No change in power surce is required for this MAR. Relay contact requirements are similar to existing relays.
- 15. Operational requirements for plant startup, normal operation, shutdown and emergency operation remain the same. However, the operational procedures will need revision to (1) reflect the starting of LPI pumps on 550 psig instead of 1500 psig, (2) the tripping of EEP-1 upon 500 psig RC pressure, and (3) to assure that the HPI is manually tripped whenever LPI is manually tripped. Tripping of the motor driven EF pump has no effect on the turbino driven EF pump. Operation of the steam driven turbine EF pump is covered by existing proceedures.

Operation of the turbine EF pump may continue as long as steam is available to drive the pump. If steam is not available and EFW is required, then the ES must be manually reset and EFP-1 re-started manually until Decay Heat can be made available to the EC System.

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182



Crystal River Unit 3

Sheet 8 of 10

OCT / MARK RANGES

88-05-24-01

- 16. Sequence loading of the EDG occurs whenever there is an ES actuation or a LOOP event. To evenly load the EDG and prevent excessive voltage or frequency dips the ES sequence block loading is modified as follows:
  - a. The DHP-1A & 18 loading is moved from Block 1 ES matrix to Block 4 ES matrix.
  - b. The DCP-1A & 1B loading is moved from Block 4 ES matrix to Block 6 ES matrix.
  - c. The RWP-3A & 3B loading is moved from Block 4 ES matrix to Block 5 ES matrix.
  - d. The BSP-1A & 1B loading is moved from Block 5 ES matrix to Block 6 ES matrix.
  - e. The EFP-1 loading is moved from Block 5 to a new dedicated EFW Block to load 5 seconds after the EDG is loaded if a LOOP event occurs without EB conditions. For non-LOOP events the EFP-1 pump starts immediately. For Large LOCA conditions with a LOOP event the EFP-1 pump will be tripped by the LPI coincident logic. For a LOOP event followed by an EB condition after EFP-1 has been sequence loaded, EFP-1 will be ES tripped and resequenced to load 5 seconds after Block 3.

The sequence logic shown on a typical elementary 208-028 ES-A20 is described as follows:

Block		Relay		Time Delay
1		AG, AH, AL, AM		NONE
2		AS	,	5 Seconds
3		AV	4	10 Seconds
4		AQ		15 Seconds
5		CD	4	20 Seconds
6	92	CE	1	25 Seconds
EPW	Ì	СН	i	5 Seconds after Block 3 conditional



Crystal River Unit 3'

Sheet 6 of 10

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88-05-24-01.

These sequencing relays are normally energized Agastat (time delay to de-energize). Since these Agastat relays have limited contacts auxiliary relays (AW, AX, AY, AZ, CF, CG, & CJ) are used to provide contacts for status lights and ES actuation matrices.

#### ES Actuation (Offsite Power Available)

Block 1 relays are automatically de-energized by an ES 'OR' logic of 1500 psig RC pressure, 500 psig RC pressure or a 4 psig RB pressure. Blocks 2, 3, 4, 5 and 6 are sequenced at 5 second intervals and are also de-energized by logic similar to Block 1. The EFW block relay CH will de-energize 5 seconds after Block 3 and provides a two-out-of-three matrix logic to start EFP-1; however, with offsite power available, the ES HPI signal which initiates sequencing will also initiate EFIC causing both Block 1 loads and EFP-1 to start at the same time. The Block 4 load for LPI provides a two-out-of-three matrix permissive start signal to the DH pumps. The actual start signal for LPI is controlled by the 4 psig RB pressure and 500 psig RC pressure 'OR' logic or the 'OR' logic of the normally energized T and 'W' relays as depicted by a typical elementary ES-A35.

#### LOOP Conditions (ES not actuated)

For LOOP conditions, the undervoltage relays initiate (close) the EDG buss loaded contact 27KA as depicted on typical elementary 208-628 ES-A28. Since a LOOP condition exists and ES has not been actuated, EFP-1 as depicted on elementary 208-028 EF-01 will be started by the ES sequence matrix ES-A29 closing 5 seconds after the EDG is loaded. Since an HPI condition does not exist, no other sequencing occurs. The LOOP condition will energize the BS relay which will prevent the 6 psig RB pressure from actuating LPI as depicted on typical elementary 208-028 ES-A35.

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### ENGINEERING INSTRUCTIONS CONTINUATION SHEET

Crystal River Unit 3

88-05-24-01

Sheet 10 of 100

#### References

(1)

- MAR 87-10-19-01A, MAR 87-07-08-01, MAR 87-10-06-01. (2)
- G/CI Letter FCS #10419 "System Flows for EDG Loading Evaluation". (3)
- G/CI telecon memo, C.C. Strempke to Don Luzzo dated 4-J-89 "SZR (4)
- G/CI Letter FCS-16125, dated 1-25-89, scope letter. (5)
- G/CI Letter FCS-9894, dated 11-4-88, conceptual design. (6)
- G/CI telecon memo. C.C. Strempke to Ron Clauson dated 5-16-85.
- G/Cl speed memo, ES paneis & cabinet seismic evaluation. 5/22/89. (8)
- G/CI Letter FCS-10424, dated 5-16-89, Purchase Requisitions. Calculation DC-8515-004-1.02 CS, and DC-5517-004-24: "L. (9)
- (10) G/CI Letter FCS-10420, dated 4-7-89, and FCS-10801. dated 9-11-85.
- (11) G/CI Letter FCS-10784, dated 8-24-89, revised scope letter.
- (12) G/CI Letter FCS-10814, dated 9-12-89, "EDG loads".
- (13) IOC, M.W. Averett to R.E. Clauson, dated 7-11-88, "Reliability Analysis for the Proposed EFP-1/LPI Logic Modification".
- (14) B&W Report 51-117603-00 "Acceptability of a 500 psig start of LP! for
- (15) G/C, Inc. Drawings: 201-129. Main Control Board Equipment Cutout Deta... 201-130. Main Control Board Equipment Cutout Details
- Desim Basis Document Temporary CHAUSE CY. 17,4849 Design Gasis Document Temporary

  Energoner Breinwater (Seat 6/18), Decay year remove\_ system

  (Seat 6/5), Ever SAFFWARDS ACTUAT MEYS. (Seat 6/8)/61

  ACT 6/5), Ever SAFFWARDS ACTUAT MEYS. D. Material See attached Bill of Materia.

#### installation instructions

- Charge all time and materia: :o NUSS052401.
- All cable handling, pulling, termination, conduit installation, equipment removal and installation scall be in accordance with applicable FPC maintenance procedures. All relays removed shall be returned to Nuclea-
- De-energize ES system Loop A.
- 1a. This MAR shall not be made operational little until NRC approval for the change has been received. A new Sofoty Evaluation will be saided = The MAR VIE FON orter was appooral



Crystal River Unit 3

Sheet 8 of 10

REP FROM BURNISH

88-05-24-01

18. The ES system provides redundant trains of actuation which is not changed by this modification. (There is no motor driven EFW pump on ES "B" train.) The starting of the LPI pumps has been modified on both trains of ES from 1800 psig RC pressure to \$00 psig. The status lights for actuation and testing have been modified on both trains of the ES. No sharing of circuits of either ES train shall occur by this modification.

Diversity of initiating LPI by RB pressure and low RC pressure is retained when offsite power is available. Whenever offsite power is lost, the RB pressure initiate signal is bypassed. The probability of having a large break LOCA condition that requires LPI occurring coincident with a LOOP event is 4.8 X 10-8 events/year per the FPC PRA.. The ES actuation of LPI is a reliable 2 out of 3 logic and since the coincidence of LOOP and LOCA is a low probability, the loss of diversity during a LOOP is acceptable. See proof the conditions of the conditio

19. The failure effects of the LPI and EF systems are not changed by this modification. The ES system failure modes also remain the same. Only the LPI actuation matrix has changed from a 1500 psig RC pressure signal to a 500 psig RC pressure signal. The actuation of LPI still occurs on diverse signals of low RC pressure (500 psig) and high RB pressure signal (4 psig) for all accidents except when coincident with loss-of-offsite-power. For loss-of-offsite-power, the 4 psig RB pressure signal is bypassed by an auxiliary relay contact requiring an energize to bypass from the 4180V switchgear breaker contacts. A single failure of a contact or relay will not cause this bypass since the bypass is upstream of the two-out-of-three matrix.

Sequence block loading has changed by this modification without introducing additional failure modes. The DCP-1A and DCP-1B pumps have been moved from Block 4 to Block 6. DHP-1A & DHP-1B pumps have been moved from Block 1 to Block 4. The EFP-1 pump is assigned to a new Block set at 5 seconds after Block 3 loading. The BSP-1A & BSP-1B pumps have been assigned to a new Block 6 set at 25 seconds. The RWP-3A & 3B pumps have been moved from Block 4 to Block 5.

The ES trip matrix for EFP-1 is initiated by a coincidence logic of low RC pressure (500 paig) AND loss-of-offsite-power. This coincident logic is upstream of the two-out-of-three matrix such that a single failure of a relay or contact does not trip the motor driven pump. The coincident logic for tripping and re-sequencing the EP pump is also upstream of the two-out-of-three matrix such that a single failure of a relay or contact does not trip the motor driven EPW pump.

This modification does not affect any HELB areas.

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## CONTINUATION SHEET

Crystal River Unit 3

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88-05-24-01

#### 18, Continued

This MAR changes color coding of wires within the ES Actuation Cabinets 4A, 4B, 4C, SA, 5B, and 5C. This is required since this MAR interchanges the output function of matrices from relays AJ and AN. The change will be identified by taping the ends of the wire with the apropriate color taps. The matrices from relays AN will be taped brown in the "A" cabinets and crange in the "B" cabinets since these are alarm ciruits. The matrices from relays AJ will be taped red and green in the "A" and "B" cabinets, respectively, since these matrices are for DH valve actuation.

This MAR also changes color seeding of wires within the ES Logic Cabinet 2B. This change was initiated to avoid confusion over color code in the cabinet and to make the color code consistent with its function. The change in color code will be identified by wrapping the ends of the wire with green tape. The change will be applied for the LPI logic from the fuse within the cabinet to the relays. Since the wires to be taped are orange (and orange and green are run together) rerouting and/or rebundling of the wires is not required.

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Next Page 9 0510

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Crystal River Unit 3

Sheet 9 of 10

RE17MAN BURNING

88-05-24-01

20. The test requirements for the ES system remains the same as currently designed. The test procedures will need modification to reflect load sequencing, new setpoints and bypass functions. Additional test switches for testing the LOOP logic have been added to the ES actuation cabinets, 4D and 5D.

A test switch contact and loss-of-offsite-power relay contact have been added to each DHP-1A and DHP-1B pump trip circuit.

The EFP-1 START and TRIP circuitry has been simplified by this change. The pump will be load sequenced and Block loaded only upon Loss of Offsite Power. The pump will be tripped upon a logic condition of LPI and Loss of Offsite Power. If an ES condition occurs after the pump has been sequence loaded it will be tripped and re-sequenced.

The Building Spray pumps (BSF-1A & 1B) logic has been simplified with a Block 6 load sequence permissive signal from an ES matrix set at 25 seconds T.D.

The Decay Heat Pumps (DHP-1A & 1B) logic has been changed from Block 1 to Block 4 at 15 seconds T.D. and the 1500 psig RC pressure initiate signal is removed. Upon LOOP conditions the 4 psig RB pressure signal is bypassed.

The RWP-3A & 3B pumps are load sequenced at 20 seconds T.D.

The DCP-1A & 1B pumps are load sequenced at 25 seconds T.D.

The BS pump test lights for ES matrix is a special configuration per MAR 87-07-06-01. Existing test procedures provide the testing method. This MAR 88-05-24-01 changes the single relay contact permissive to an ES matrix permissive as depicted on dwgs. ES-A30, B30, A66 and B66.

The DH pump test lights for ES matrices are a special configuration per this MAR 88-05-24-01 as depicted on 208-021 DH01 and DH-02. A single set of lights are utilized to test both the HPI perrossive matrix using the HPI test switch and the LPI actuation matrix using the LPI test switch.

- All equipment of this modification is accessible for maintenance and testing.
   There are no additional in-service inspection requirements.
- 27. All material shall be from site stock or be similar to existing wire, switches, and relay contacts suitable for safety systems.
- 29. The additional DHP-1A and DHP-1B pump trip circuit being installed by this modification for loss-of-offsite-power shall be routed and/or protected to prevent tripping of both pumps due to a fire.

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Crystal River Unit B

Sheet 18 of 18

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88-05-24-01

- 31. The ES actuation status lights on the ESF section of the main control board (MCB) shall be re-configured to:
  - a. Reflect the 500 psig trip signal for LPI
  - b. Reflect the block loading of DHP-1A & 1B, DCP-1A & 1B, EFP-1, BSP-1A & 1B and RWP-3A & 3B.

The ES test matrix status lights on the actuation cabinets shall be reconfigured reflect items (a) and (b).

Layout and labeling shall follow the guidence of SP-5145.

33. The purpose of this modification is to reduce EDG loading. Both the LPI pumps and the EFW pumps need not operate simultaneously during LOCA events coincident with loss-of-offsite-power. Hence, either the LPI or the EFW pumps will be running during this scenario.

To accomplish the above the ES system relay logic and status light's requires changes resulting in the following maximum load changes.

#### EDG

A	VBJA	VBDP-3	BKR #1 .	96.42 watt increase
A	VB3C	VBDP-S	BKR #1 .	96.42 watt increase
В	VBJB	VBDP-4	BKR 01 .	96.42 watt Increase
A	VB3A	VBDP-3	BKR 67 .	17.92 watt increase
В	VB3B	VBDP-4	BKR #2 .	65.28 watt increase
A	VB3C	VBDP-6	BKR 62 .	65.28 watt increase
В	VB3D	VBDP-6	BKR #2 .	65.28 watt increase
В	VB3B	VBDP-4	BER 47 .	15.68 watt increase
A	VB3A	VBDP-3	BKR 06 .	8.43 watt decrease
A	BUSSIA	DPDP-SA	Fune #3 .	7 .28 watt increase
B	BUSS3B	DPDP-SB	Fuse #3 .	\$1.84 watt increase
Ã	BUSSIA	DPDP-SA	Fuse 610 .	1.29 watt decrease
В	BUSS3B	DPDP-SB	Fuse #10 .	.05 watt increase

 The modification occurs in the Control Building at elevations 198', 124', 134' and 145'. DAC's are CB393 CB394, CB395, CB594, CB298 and CB299.

Modera

CR3 005835



#### EMERGENCY DIESEL GENERATOR LOADING JUSTIFICATION



DIR Sheet 104

HAR 88-05-24-01	The same of	July 3, 1909
EF/DH START HODIFT	CATION	
of the below listed items	must be checked.	•
The load is needed to be	ng the plant to a sale condition	n after a design basis accident.
	EDG basked per MRC regulat	lone (s.g., Reg. Guide, NURSQ, IE Bulletin, etc.). The H
The applicable PBAR sec	ion is identified as follows:	locumented in the PBAR as requiring to be EDG becker
Section 6, 7, 8.	0 and 10	
Other (Explain)	1	
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### VERIFICATION REPORT

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				reasonable? Where necessary, are the assumptions identified for subsequent reverifications when the detailed design activities are completed?
2.	E.	=		Are the appropriate quality and quality assurance requirements specified?
4.	K			Are the applicable codes, standards and regulatory requirements including leave and addenda
		-		properly identified and are their requirements for design met?
5.	×	=	Ξ	Have applicable construction and operating experience been considered?
6.	XXX	บบบบบ	=	Have the design interface requirements been satisfied?
7.	×			Was an appropriate design method used?
a.	Z.	=		is the output reasonable compared to inputs?
9.	E.		=	Are the specified parts, equipment, and processes suitable for the required application?
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				conditions to which the material will be expected?
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22.	=	=	×	Have High Energy Line Break (HELB) considerations been adequately accreseed?
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	Des	ign	rev	iow of changes attached to FCS-10981 against Design Inputs.
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# VERIFICATION REPORT Crystal River Unit 3

MAR 88-05-24-01

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# VERIFICATION REPORT Crystal River Unit 3

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### VERIFICATION REPORT Crystal fuver Unit 3

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Operation of this system does not depend on the operation of any other ES. However, the system can be operated in series with the Decay Beat Removal System, if needed, in the recirculation mode.,

### 6.1.3.2 Low Pressure Injection System (LPI)

One pump can deliver approximately 3,000 gpm to the reacter vessel. Assuming the reacter had been operating at full power prior to the accident, the decay heat being generated in the core at 30 minutes after the accident is approximately 1.9% of full power.

Following a LOCA assuming a simultaneous loss of normal power sources, the emergency power source and the LPI system will be in full operation within the required as seconds.

The LPI System is connected with other-ES Systems in four respects, i.e., (1) the EPI, the LPI, and the Reactor Building Spray System take their suction from the BWST; (2) the LPI pumps and the reactor building spray pumps share common suction lines from the reactor building sump during the coolant recirculation mode; (1) the LPI System and the Core Flooding System utilize common injection nozzles on the reactor vessel; and (4) the EPI System may be operated through the LPI system if recirculation through the EPI pumps is required.

#### 6.1.3.3 Core Plooding System

Injection response of the Core Flooding System (see Pigure 6-2) is dependent upon the rate of reduction of RIS pressure. The capability of the Core Flooding System to reflood the core is described in Chapter 14.

The core flooding nozzles and lines are designed to assure that they will accommodate the differential temperature which occurs between the injection mode and the recirculation mode.

#### 6.1.4 TESTS AND INSPECTIONS

All active components of the ECCS, listed in Table 6-5, are tested periodically to demonstrate system readiness. Performance of active systems is tested by establishing flow and observing pressures and flows during scheduled shutdowns. The EPI System is inspected periodically during normal operation for leaks from pump seals, valve packing, and flanged joints. During operational testing of the LPI pumps, the portion of the system subjected to pump pressure is inspected for leaks. Pump seals, valve packing, flange gaskets, beat exchangers, and safety valves are inspected for leaks to the atmosphere.

will not inhibit the overall ES functions. Where a motor-operated or a sciencid-operated valve is driven by either of two matrices, one is from actuation channel A and one from actuation channel B. Redundant ES pumps are controlled from separate and independent actuation channels.

The bistable units and output relays in the instrumentation channels are de-energized to trip, and similarly, the logic matrices in the actuation channels are de-energized to trip and actuate the ES equipment except for the "LPI pump start" and "EFW pump trip upon LPI start" matrices which are energized to trip for reliable operation of the EFW pump. Separate essential service and DC power supplies are used for each actuation channel.

Actions initiated by the ESAS are summarized in Table 7-3, Figure 7-4, sheets 1 and 2 and Figure 7-5.

### 7.1.3.2.3 Description of Protection Channels

#### a. HPI and Loading Sequence

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Referring to one of three transmitters shown in Figure 7-4 Sheet 1, a signal proportional to the reactor coolant pressure is applied to a safeguards bistable and to a bypass bistable. The design of safeguard bistables is such that when the reactor coolant pressure is above the setpoint and control power is available, bistable interposing relay R3 is energized.

The bypass enabling contact of the bypass bistable, however, closes when the pressure is below its setpoint (1780 psig) and control power is available. This permits manual bypass for normal shutdown.

HPI is initiated by de-energizing the multiple contact output relays constituting loading sequence block 1, in 2-out-of-3 channels. The multiple contact output relays can be de-energized by the manual actuation relay, by their related test contact and by an 'OR' function made up of contacts which open when the reactor coolant pressure is below 1,500 psig (R3), the reactor building pressure exceeds 4 psig (R12) or the reactor coolant pressure is below 500 psig, respectively.

The ES load sequencer timers are normally energized and will de-energize to time out in 5 second intervals. As shown on Figure 7-4 Sheet 1, the initiation of the load sequencer is a similar 'OR' logic of coutacts which open when RC pressure is below 1,500 psig or RB pressure exceeds 4 psig or the RC pressure is below 500 psig or a manual operator initiation occurs. This 'OR' initiation logic is in a 'AND' logic with the ES 4160 volt bus 2-out-of-3 undervoltage scheme to keep the timer relays of Blocks 2, 3, 4, 5, 6 and EFW energized until the EDG is started and loaded on the ES bus.

The 'OR' initiation logic is in a 'AND' logic with an automatic reset scheme for timers 4 and 5 in the event the loading sequence would be re-initiated by an ES subsequent signal. A manual reset of timers 4 and 5 is provided such that the HPI portion of ES can be taken to manual control if required without affecting automatic actuation of the DH and BS systems.

The EFW Block timer is a conditional logic specifically for the EFW motor driven pump EFP-1 of the ES 'A' train to provide for anticipatory of the EFP-1 pump in 5 seconds in the event of a LOOP event without ES actuation and to provide sequence loading 5 seconds after Block 3 should ES condition be present. This is

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accomplished by the auxiliary relay contact of timer 2 is normally closed, the Block I relay contact is normally open and the auxiliary relay contact for LOOP is a normally de-energized closed contact.

Hence, for a LOOP event without HPI initiation, the EFW Block timer times out in 5 seconds. For an ES HPI initiation without a LOOP event, the EFW Block timer times out 5 seconds after Block 3 (timer 2) or 15 seconds after the EDG is loaded. For a LOOP event after a ES HPI condition the EFW timer and associated timer 2 are reset such that EFW will again time out 5 seconds after Block 3 (timer 2). For an ES HPI initiation after a LOOP event, the EFW timer will again time out in 5 seconds after Block 3 (timer). A logic circuit of relay contacts from Block 1, Block 3, LOOP suxiliary relay and 500 paig EC pressure trips the EFW pump EFP-1 when a LOOP event is followed by an ES HPI initiation or a 500 paig EC pressure as shown of Figure 7-5.

The interlocks with the undervoltage scheme is such that, in case of a blackout, block 2, 3, 4, 5, 6 and EFW are kept in their reset status as long as there is no voltage on the related engineered safeguards bus. As soon as the emergency discal generator is connected on the bus, auxiliary contacts from the discal generator circuit-breaker are used to defeat the action of the undervoltage relay scheme irrespective of the voltage on the bus thus preventing erratic loading or simultaneous energization of load blocks 2, 3, 4, 5, 6 and EFW. The emergency discal generator is connected automatically on the bus only when correct voltage and frequency are reached.

De-energizing output relays of block 1, 2, 2, 4, 5, 6 and EFW in two of the three channels will start, in sequence, the following equipment.

Block 1 HPI pumps Injection and nuclear service valves

Block 2 Reactor building cooling fans to low speed Emergency nuclear service seawater pumps

Block 3 Emergency nuclear services closed cycle cooling water pumps
Decay heat pump air handling units

Block 4 LPI pump (for which minimum flow recirculation is provided) Start
Permit

Block 5 Decay heat service seawater pumps

Block 6 Reactor building spray pump start-permit
Decay heat close cycle cooling water pumps

EFW Block . Motor driven emergency feedwater pump

Low Pressure Injection

The channels of LPI are equipped with bistables similar to those used for HPI but which are adjusted to actuate at a lower setpoint. The output relays can be de-energized by the manual actuation relay, by their related test contact, and by an 'OR' function made up of contacts which are open wiscu

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automotically DIMESED by an affiliary rate contact which is the contact which is the contact of the V fander with the breaker contacts and the EBG breaker class auxiliary.

reactor building pressure is below 500 psig, or when the reactor building pressure exceeds 4 psig. A typical channel is shown on Figure 7-4. Sheet 1. The output of the bistables will de-energize the open output relay to the bistables at 500 psig. for actuation of the LPE valves and wrote. The bypass enabling contact of the bistable closed when

The bypass enabling contact of the bistable closed when the reactor coolant pressure is below its setpoint (900 psig) and control power is available. This action permits manual bypass of the channel for normal shutdown of the system.

## Reactor Building Isolation and Cooling

The channels of reactor building isolation and cooling are similar in design to the channels of MPI and loading sequence except for the bistable and the bypass circuit. as shown in Figure 7-4. Sheet 2. When the reactor building pressure is below 4 psig and control power is available, pressure switch interposing relay R10 is energized to the reset state by means of the bypass reset pushbutton. A subsequent loss of power or rise in building pressure above setpoint will idrop out R10.

The continuous bypass of a channel is possible only after a 2-out-of-3 actuation. De-energizing the output relays of 2-out-of-3 channels initiates; reactor building isolation, starts reactor building emergency cooling, and opens all valves required for reactor building spray. The reactor building pressure is sensed by two sets of three pressure switches, and the bypass can only be energized after a 2-out-of-3 actuation.

Also, reactor building isolation of systems not required for containment or RCS heat removal is initiated by HPI actuation. Bypass capabilities are the same as those for HPI, however, they do not affect the 4 psig building isolation logic.

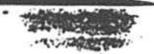
## d. Reactor Building Spray

Sequence Start permit

Reactor building spray is initiated by starting the pumps at 30 psig in the reactor building coincident with HPI actuation. This is achieved, as shown in Figure 7-4. Sheet 2, by sensing the reactor building pressure with two sets of three pressure switches. Each set of three pressure switches, which are wired in a 2-out-of-3 matrix, controls the closing coils of the circuit breaker of one spray pump.

7-27

(Rev. 8)



ES "A" trouble and ES "B" trouble alarms ES "A" not reset and ES "B" not reset ES "A" not bypassed and ES "B" not bypassed alarms ES "A" reactor building isolation on and ES "B" reactor building isolation on ES "A" diesel failed to start and ES "B" diesel failed to start 25 °A° reactor building spray on and ES °B° reactor building spray on Channel RC-1 1,500 psi trip bistable tripped Channel RC-2 1,500 psi trip bistable tripped Channel RC-3 1,500 ps; trip bistable tripped Channel RC-4 500 psi trip bistable tripped Channel RC-5 500 psi trip bistable tripped Channel RC-6 500 psi trip bistable tripped ES aux., test, and channel cabinets fan failure Transmitter power supply cabinet "A" standby power Transmitter power supply cabinet "B" standby power Automatic closure interlock decay heat valve system trouble Actuation "A" and Actuation "B" for loading sequence Block 1 Actuation "A" and Actuation "B" for loading sequence Block 2 Actuation "A" and Actuation "B" for loading sequence Block 3 Actuation "A" and Actuation "B" for loading sequence Block 4 Equipment and cabling associated with the ESAS are distinguished by color coding, marking, and equipment location. Eac is completely separate from the other as stated above. Each ESAS train

A. 3. 3. 5. 5.

Actuation " for landing sequence block EFW

## 7.1.3.3.2 Electrical Isolation

The use of buffer or isolation amplifiers prevents any faults (shorts, grounds, or cross connection of signals) on any analog signal leaving the system from being reflected into or propagating through the system. The direct connection of any analog signal to a source of electrical power can, at most, negate information from the measured variable involved. A de-energize to actuate design does not require an isolated power supply. To prevent false actuation due to a single power supply failure each transmitter and its associated bistables and channels are connected to separate vital buses.

## 7.1.3.3.3 Physical Isolation

Physical isolation is provided between channel transmitter- bistable combinations and pressure switches monitoring the same variable. Each of the twelve channels comprising actuation system "A" or "B" is isolated from the others up to the point where the 2-out-of-3 matrices are formed.

Complete separation also exists between the 2-cut-of-3 matrices of the actuation systems "A" and "B" used to drive the redundant Es equipment.

## 7.1.3.3.4 Periodic Testing and Reliability

The safeguards actuation system is designed to be tested any time during plant operation or shutdown and fully complies with the requirements of IEEE 279-1968.

The pressure sensors are periodically checked by comparing their output signals with the output signal of similar sensors monitoring the same parameter.

The bistables may be tested one at a time by substitution of signals at the isolation amplifier, allowing accurate affustment of the set-point. The two channels originating from one bistable will be tripped each time their initiating bistable is tested, assuring that protective action cannot be defeated.

A test switch associated with each engineered safeguards bistable which will permit demonstrating the bistable's capability to trip its associated channels.

The ESAS includes all the devices from sensor through the 2 out of 3 logic matrix. The ESAS contains the Automatic Actuation Logic which is the logic performed by the 2 out of 3 matrix. Additionally, the Reactor Building Spray Automatic Actuation Logic includes all the logic provided by the 30 psi RS pressure switches coincident with an HPI organization. The end device includes the final component that is being actuated, i.e., valves, circuit breakers, pumps, etc.

Sequence start permit

(Rev. 25)



## Engineered Safeguards Actuation Conditions

Function	Plant Variable	Setpoint,	Bypass
High pressure injection and loading sequence and	Low reactor coolant pressure	≥1.500	Manual bypess per- mitted below 1.700 psig. Bypass removed above 1.700 psig.
EFP-1 start	Low-low reac- tor coolant pressure - or	≥500	Manual bypass permitted to below 900 psig. Bypass removed above 900 psig.
	High reactor building pres- sure	<u>&lt;</u> 4	Hanual bypass permitted after actuation of any 2 out of 3 channels and during post-accident to permit reconstituting system.
Low pressure injection	Lolow reac- tor coolent pressure - or -	≥500 (	Manual Dypass permitted below 900 psig. Bypass : removed above 900 psig.
(*) (4	High reactor building pres- sure # #	<u>&lt;</u> 4	Manual bypass permitted after actuation of any 2 out of 3 channels and during sest-accident to permit reconstituting system.
Reactor build- ing isolation and reactor building cooling	High reactor building pres- sure -or MP: actuation	<u>&lt;</u> 4	Hanual typess permitted after actuation of any 2 out of 3 channels and during post-accident. Same as mPI above.
Reactor build- ing spray	High-high reactor building pressure and high pressure injection		Hone.
EFP-1 Trips	Low-Low swaller war	≥500 (	
*Isolation only Reactor Coolant	of those systems t System heat remo	not requir	red for Reactor Building or

## 4 psig R& Fressure expensed on Loss of Offs. 7. Power (Loof) and Zien, ## LOOP event only

back to the Dedicated Emergency Feedwater (EFT-2) Tank. The motor-driven emergency feedwater pump (EFF-1) receives power from the 4160 volt Engineered Safeguards (ES) Bus 1A. The motor is tripped on an AC power failure at the bus. In the event of this condition, reincident with loss of both main feedwater pumps or low level in either CTES, the motor-driven emergency feedwater pump vill automatically start five seconds after ES -Block 4 is loaded onto the "A" train diesel generator. The turbine-driven emergency feedwater pump is independent of AC power and starts by opening the 125V DC motor operated steam admission valves (ASV-3 and ASV-204) when activated by the EFIC System.

### 10.5.2.1 Motor-Driven Emergency Feedwater Pump

The Motor-Driven Emergency Feedwater Pump (EFF-1) is povered from emergency diesel generator 3A when normal AC pover is not available. It has a rated capacity of 740 gpm at 1300 psig with a design recirculation flowrate of 200 gpm with the pump discharge closed. Motor, gear cooling, and lube oil cooling are supplied from the Nuclear Services Blosed Cycle Cooling System (SW). Manual controls (both locally and on the main control board) provide the operator with the capability of shutting down the pump if the extra feedwater capacity is not required.

#### 10.5.2.2 Turbine-Driven Emergency Feedvater Pump

The Turbine-Driven Emergency Feedwater Pump (EFF-2) provides redundant 100% capacity to the EF System and automatically starts on the same initiating signals as the motor-driven emergency feedwater pump (EFF-1). It has a rated capacity of 740 gpm at 1300 psig with a design recirculation flowrate of 200 gpm with the pump discharge closed. Manual controls (both locally and on the main control board) provide the operator with the capability of shutting down the pump is the extra feedwater capacity is not required. Lube oil cooling is supplied by the pump discharge water.

#### 10.5.2.3 Emergency Feedwater Pump Turbine Drive

The Turbine Drive (EFTS-1) provides rapid start-up for EFP-1. The steam supply for EFTS-1 is obtained from both OTSGs through six-inch lines containing normally-open DC motor operated stop-check valves (MSV-SS and MSV-S6) and check valves (MSV-186 and MSV-187). The check valves and motor operated valves provide redundant isolation capability to preclude blowing down the operable steam generator in the event of main steam line or main feedwater line break. Downstream of check valves (MSV-186 and MSV-187) the lines join to form a common supply to the pump turbine. Upstream of the turbine are redundant, normally closed DC motor operated valves (ASV-S and ASV-204) which are open upon actuation from the EFIC System. A description of the controls for these valves is contained in Section 7.2.4.

Turbine exhaust is vented to the atmosphere.

(Rev. )()

METOGRA AND MARY COPY.

# INTER-OFFICE COMMUNICATION

906-212

TO TACK TLAST	11.	DATE	12-16-88
SUBJECT EDG LOADIN	& GALCULATI	00%	
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AND FONE UPDATES	REFLECTION	THESE COMMES WIL	BE PRIVIDED AT
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## **ENGINEERING INSTRUCTIONS** CONTINUATION SHEET

Crystal River Unit 3

Sheet 10 o' 100

88-05-24-01

## References

- MAR 87-10-19-01A, MAR 87-07-08-01, MAR 87-10-06-01.
- G/CI Letter FCS #10419 "System Flows for EDG Loading Evaluation". (2)
- (3) G/CI telecon memo, C.C. Strempke to Don Guzzo dated 4-J-89 "SER points".
- G/CI Letter FCS-10125, dated 1-25-89, scope letter.
- G/CI Letter FCS-9894, dated 11-4-88, conceptual design. (5)
- G/CI telecom memo. C.C. Strempke to Ron Clausem dated 5-16-59. "Annunciator windows." (6)
- G/CI speed memo. ES panels & cabinet seismic evaluation. 5/22/89. (7)
- (8)
- G/CI Letter FCS-10424, dated 6-16-89, Purchase Requisitions. Calculation DC-5515-004-1.02-CS, and DC-5515-004-24: L. (9)
- (10) G/CI Letter FCS-10420, dated 4-7-89, and FCS-10801, dated 9-11-89. FSAR Transmittal.
- (11) G/CI Letter FCS-10784, dated 8-24-89, revised scope letter.
- (12) G/CI Letter FCS-108:4, dated 9-12-89, "EDG loads".
- (13) IOC, M.W. Averett to R.E. Clauson, dated 7-11-88, "Reliability Analysis for the Proposed EFP-1/LPI Logic Modification".
- (14) B&W Report 51-117603-00 "Acceptability of a 500 ps;g start of LP: for all Loss of Coolant Accidents".
- (15) G/C, Inc. Drawings: 201-129, Main Control Board Equipment Cutout Details 201-130. Main Control Board Equipment Cutout Deta...
- Desim GASIS DOSUMENT TEMPORARY CHAUSE UP. LT. LT. LE. LT. BESTER BASTS DOCUMENTED (SEET 6/3), DECAY HEAT REMOVE STETOM (SEET 6/3), EVER SAFEWARDS ACTUAT MAYS. (SECT 6/3, 16/51 AST 16/3). Material See attached Bill of Materia.

## installation instructions

- Charge all time and material to NU88052401.
- All cable handling, pulling, termination, conduit installation, equipment removal and installation shall be in accordance with applicable FPC maintenance procedures. All relays removed shall be returned to Nuclear Materials Coordinator .
- De-energize ES system Loop A.
- 1Q. This MAR shall not be made operational His until NRC expressed for the change has in been received. A new Safety Evaluation will be saided = The MAR VIE FEN orter NAC approval

1 Popol

## EXHIBITS TO THE TESTIMONY OF PAUL F. MCKEE

EXHIBIT No. \_\_ (PFM-4)

DUKE POWER CORRESPONDENCE

MAL B. TUCKER

P. 002 F. 02

2002

03/17/97 KON 09:54 PAX 803 845 3411

MECH SYSTRES FING

DOES FOWER COMPANY P.O. BOX BOLES CKARLOTTE, N.C. SSE48



December 7, 1989

U. S. Nuclear Regulatory Commission Document Control Deak Washington, DC 20555

Subject: Ocones Nuclear Station

Doc. Nos. 50-269, -270, -287

Installation of Cavitating Venturi

On October 17, 1989, Duke Power personnel met with the NRC Staff to discuss sump runout protection for the Oconee Emergency Feedwater (EFW) pumps. This meeting was requested by me in a letter dated June 20, 1989. The purpose of the meeting was to discuss, in depth, the reasons for revising our previous commitment to implement a hardware fix to reduce operator burden during postulated accidents with low steam generator pressure. As discussed during the October 17, 1989, meeting we have been evaluating various options to address this concern, and to date have not been able to identify an optimum solution. Accordingly, we do not intend to implement any hardwars fix to address this concern. As such, I am withdrawing my commitment to install cavitating venturies or any other modification in order to relieve operator burden in ensuring that the EFW pumps are protected from runout in postulated accidents with low steam generator pressure. The basis for this change was discussed in depth during the October 17, 1989 meeting. We will continue to assure operator awareness of this potential problem, through training and procedures.

In addition during the October 17, 1989 meeting, the vibration problems with installing cavitating venturies into Oconee EFH system was discussed. The NRC requested that Duke provide additional information regarding this problem. To this end, please find attached the requested information.

PFG/78/td

Attachment

TEL: 813 800 4931 FAX NO. 2036653864

P. 003

@1005

03/17/87 MOK 09:57 FAX 863 885 3411

MECK SYSTRES ENC.

OCONEE UNITS 1. 2. and 3 Cavitating Venturi Vibration Problems

To solve the potential problem with EPW pump rumout and enhance the operation of the LPW system, cavitating venturis were selected as a possible passive solution that might effectively reduce operator burden without complicating the system.

following the design and manufacture of the venturis. the venturis were installed in a temporary test loop and operated to verify functional performance and measure vibration created in downstream piping. The piping response under postulated worst case cavitating conditions resulted in vibration valocities in excess of 10 ips-pk (pegging the mater) and accelerations in excess of 60 g s.

While it is generally accepted that the piping vibration is highly dependent upon the piping geometry and support configurations, it is also known from failurs experiences that cantilevered vents and draine, as well as valve actuators, can have vibration responses several times higher than the run piping for cavitation type input. The greater response of these components to the high lavel of "white neise" is attributed to the poor everall damping available in combination with excitation of natural frequencies from the broad frequency range forcing function.

Inasmuch as (1) the Duke piping in quastion near the proposed location of the cavitating venturi does contain centilevered attachments and (2) we expect that, based on our experiency, this piping would be highly susceptible to short term vibration fatigue, we cannot recommend installation of the cavitating venturi as a solution to our problem with EFV pump rungut.

This opposition is further reinforced by our concerns that if we were to install the venturi. a lengthy data acquisition testing effort would be required to adequately evaluate the systems functional integrity under the conditions generated by the cavitating venturi. Following data collection, the unit would be considered inoperable for days or perhaps weeks while analytical afforts were made to qualify the vibration and calculate the allowable remaining fatigue stress cycles not consumed by the testing. Efforts to limit etress cycles and allow a greater alternating atress intensity would quickly reduce the allowable run time. This could force tracking of the stress cycles during actual unit operation resulting in extensive permanent instrumentation, monitoring equipment, and evaluation expense.

03/17/07 KON CE:88 PAX 803 885 3411

P. 004

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HUCH SYSTEMS INC



Also, the demands of the Duke system configuration would have required placement of a venturi immediately upstream of a secured cabinet containing several valves and branch connections. Secause of the high vibration susceptibility of these components, extensive data collection and additional compensatory security ecasures in these areas would have been required during the attempted qualification testing.

Purthermore, discussions with another utility having cavitating venturis installed in a simple piping configuration reinforced the belief that qualification would likely be such more difficult. if at all possible. for Duke's complicated piping geometry.

In summary, many factors pointed to the decision not to attempt installation and qualification of the cavitating ventures. Among them were previous experiences with high vibration failures and comments from other utilities concerning qualification difficulties for such simpler piping systems, as well as, vibration results from the test loop.

## PAUL F. MCKEE

EXHIBIT No. \_\_\_ (PFM-5)
COUTEC CORRESPONDENCE

### Coltec Industries



April 17, 1996

Fairbanks Morse Engine Division 701 White Avenue Bates, WI 53511-5492 605/354-4411 FAX: 608/364-0382

Florida Power - CR3 15760 W. Powerline Street Crystal River, FL 34428

Attention M.U. Rahman

Subject

Crystal River Unit 3

**Emergency Diesel Generators** 

Load Excursion

Reference (a) Florida Power NED96-0227, dated 4/10/96

Gentlemen.

In response to reference (a), please be advised that a one time excursion of 3500/3700 KW for up to 2 seconds during motor starting is not expected to have an adverse affect on the genset

It should be noted however, that multiple excursions will have a cumulative effect that can increase potential for component distress

Known affects of engine overload include.

- piston ring breakage
- piston insert cracking
- liner/jacket cracking
- piston bushing extrusion

Coitec recommends that should an event(s) of this nature occur, engine operating parameters should closely monitored to determine performance changes and inspections should be scheduled to determine any component distress.



Florida Power 4/17/96 Page 2

If you have any questions or require additional information, please contact the writer at (608) 364-8424.

Very truly yours,

T.M. Stevenson

Manager Parts Sales, Nuclear and Export

TMS:jaw

cc J Eves

T Miller

T. Stull

G. Kasel

G Gutoski



## Coltec Industries



April 25, 1996

Fairbanks Morse Engine Division 701 White Avenue Beloit, WI 53511-5492 808-384-4411 FAX: 808/364-0382

Florida Power - CR3 15760 W. Powerfine Street Crystal River, FL 34428

Attention M.U Rahman

Subject:

Crystal River Unit 3

**Emergency Diesel Generators** 

Load Excursion

Reference

(a) Florida Power NED96-0264, dated 4/24/96

(b) Coltec Letter dated 4/17/96

Gentlemen

In response to Reference (a), please be advised that a one-time event identified per Reference (a) is not expected to have an udverse effect on the genset

Please refer to Reference (b) for multiple event effects on the yenset

If you have any questions or request additional information, please cont... the at 008-304-8424

Very truly yours.

T. M. Stevenson

Manager, Nuclear Parts Sales

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DIPOOR QUALITY, BUT READABLE
DIPOOR XEROX COPY

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CC.

R Blessin

T. Miller



## EXHIBITS TO THE TESTIMONY OF PAUL F. MCKEE

EXHIBIT No. (PFM-6)

MAR DOCUMENTATION FOR 1996 MODIFICATION



## MAR REVIEW CHECKLIST

Page Lof L

MAR 96-04-12-	O/ Number of FONs
MAR Page No.(s) checked and MAR number correct on all docume	Post Mod. Functional Test Form
Safety Related / ISI Review / EQ R	sview / Safety Evaluation Review Form (if required)
Required Signatures on MAR/FC Approval Sheet: If req'd make sure eignature / date written	Fire Protection Review Form
PRC Committee Chairman signature checked yes)	(if Modification Procedure Review Forms (yellow/green)
NGRC signature (if marked yes)	ON/A for permanent MARs)
Installation Authorized by Nuclear I	Plant Operations Acceptance Form .
Temporary Modification Removed signature (N/A for permanent MAR	Walkdown and System Acceptance
MAR Test Supervisor signature	Completion of Modification Testing Notice
Installation Complete signature Nuclear Project Specialist	Procedure Review Records
Safety Evaluation (10CFR50.59) (may be N/A if a minor MAR)	Completion of Training Notice
NRC authorization received (if req. on the safety evaluation)	Fast Turnaround Drawing Update Notice (if required)
All listed attackments (Section B) is and completed (except drawings)	cluded MAR Drawings / As-Built Notice
EQ Review Form (if required) (may be included in main MAR)	Deta Transmittal Sheets  Completion of EQ Qualification Notice (if required)
MAR Transmittal Memo	Work packages mylered for completeness (all equired procedure ? signoff complete)
As-Built Completion Notice	All test procedures Third at 1
ISI Review Form (if required)  Line Brownish  All Reviews	All documents eigned and deted
ches Burling Co	CR3 005889

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## **ENCLOSURE 2**

## FLORIDA POWER CORPORATION QUALITY ASSURANCE RECORD TRANSMITTAL

ATTENTION: RECORDS MANAGEMENT SECTION CRYSTAL RIVER UNIT NO. 3  DOCUMENTS TRANSMITTED: MAR 96-04-12	on Bylombra
BIOC NED 96-0272 @ TPS	The same of the sa
working Copy @ WR# 3350	
- Need:	
DAGBET Comp Notice  DAGBET Comp Notice  DAGBET Comp Notice  DAGBET Comp Notice  SP-349 A  SP-640A	
The Quali inclusion	r
These rec Power Corporation's Quality Program.	Florida
Responsible Supervisor/Designee	DATE
RECEIPT ACKNOWLEDGEMENT BY:	<b>金属等等</b>
Manager, Nuclear Information Resources/Des	

CR3 005890



## PLANT DESIGN BASIS DOCUMENT TEMPORARY CHANGE Nuclear Engineering

TEMPORATY CHANGE BLANGER

51

. B. Doyel (	3.12.4cl 5/30/96	4440	
PRECTED BYSTEMISUACCION		6/13, pp36 and 63	
To be comple	ted by Design Engineer		
	hange to: (Check one) Design Basis Document (DBD)	EDBD TC No. 511 Sheet / o	14
	changed.	Anagement and Safety Analysis required if All	ID is
	Fopical Design Basis Document (TD80	0)	
	equired Yes No (If No, NA	ded in the appropriate document for information	n only
. To be comple	ted by CMI, except as noted in instru	octions.	
YES	2. Marked Up Pages of th 3. 10CFR50.59 Safety Ev covering the change is	Form with Technical Justification included. se appropriate document included. valuation performed (Required if Safety Evaluat not located in another document. If located in document MAR 96-04-12-01	
	Nuclear Engineering Sa assessment covering to located in another doc	fety Impact Assessment performed. (Required the chrige is not located in another document turnent, list source document	. 17
	5. Revised Table of Conte	ints included.	
. CMI Review (	Comments / Resolution:		
	No comment Comment / Resolution		
Supervisor, NF	uts as follows: persent (Original) TS : Maintenance / Component Engineering Yes : No BI "Yes," send copy of peg	□ Yes □ No	R3 005891



## ANALYSIS/CALCULATION

Crystal River Unit 3

Page	1	of 1

EDBD TC 511

#### Statement of Changes:

- 1.) Remove the first part of the sentence, "EC train A EF initiate is required to open ASV-204..." under <u>COMPONENT/PARAMETER</u> on p36 and add to the text a second sentence as follows, "ASV-204 is a remote manual operated valve providing a redundant steam admission valve to ASV-5."
- Reword the Reason/Source to reflect that only ASV-5 receives an open demand signal from EFIC.

#### Technical Justification:

This MAR is being driven by the performance requirements of 2 major components in the plant, the Steam Driven Emergency Feedwater Pump, EFP-2, and the "A" Emergency Diesel Generator, EGDG-1A. In 1987, while struggling with the question of how to meet the loading requirements for EGDG-1A after loading EFP-1 on it for a LOCA, concurrent with a Loss of Offsite Power (LOOP), and a "B" Battery failure, the solution was proposed, accepted, and installed to power ASV-204 from the "A" electrical train and initiate an automatic opening of the valve in the event of an EFIC actuation. By doing this, the load expected to be carried by EFP-1 would be minimized as EFP-2 would be running without any controls, i.e. at full speed. This was the only way that the projected load on EGDG-1A could remain within the rated capacity of the machine at that time. Since then, the upgrade of the diesel generators has been completed, and new electrical calculations show that EGDG-1A can handle the load of EFP-1 in this accident scenario. In addition, a concern about the NPSH requirements for EFP-2 not being met when the pump is running in this all out condition dictated that this automatic opening of ASV-204 be removed.

EDBD TC No. 5/1 Sheet 2 of 4

CR3 005892

*** *******		-		
3. Doyce 5/34/4	VERIFICATION ENGINEER	DATE	SUPERVISOR, NUCLEAR ENGINEERING	DATE

# CRYSTAL RIVER UNIT 3 ENHANCED DESIGN BASIS DOCUMENT EMERGENCY FEEDWATER/EMERGENCY FEEDWATER INITIATION & CONTROL

## 3.0 COMPONENT PARAMETERS

## EDBD TC No. 511 Sheet 3 of 4

## COMPONENT/PARAMETER

### REASONS/SOURCE

#### INTERFACE

FSAR

FSAR

FSAR Sections 14.2.2.1, 7.2.4, 10.2.1.2

TO ASY-S.

CC Train A EF initiate is required to open ASV-204

TO OPEN ASV-5, MSV-55, and MSV-56. ASV-204 IS A

THANKALLY OFERATED VALVE

PROVIDER A REDUNDANT

STEAM ADMISSION VALVE

TO ASY-S.

CD SIRIES

Opening ASV-5, 204 provides

redundant steam admission for the start of EFP-2. MSV-55, 56 are normally open motorized stop check valves; however, they receive a signal to open to ensure steam flow in case of inadvertent closure for any reason. Specific component/parameters are addressed in the

References 23, 32, 117

AS and MS EDBD's.

FSAR Sections 10.5.2.3, 10.2.1.4

EC is required to control the ADV's MSV-25, and MSV-26 to a predetermined setpoint and provide manual capability thru a hand-auto station.

Flow orifices EF-023-FE, EF-024-FE, EF-025-FE and EF-026-FE are required to be designed with a beta ratio of 0.6197 for a design flow of 1000 gpm. Allows steam generator pressure control independent of the ICS without unnecessarily challenging the MSSV's. Manual capability allows for pressure control during cooldown using EF.

#### Reference 23

NUREG-0737 requires EF flow measurement. The orifices were originally installed with a design flow of 820 g m.
Reference 47 increases the scale to 1,000 gpm because the flow instrumentation had pegged high on several previous EF actuations. A B=0.6197 gives an adequate differential pressure for flow measurement.

Reference 47, 77

AS System MS System

MS System

# CRYSTAL RIVER UNIT 3 ENHANCED DESIGN BASIS DOCUMENT EMERGENCY FEEDWATER/EMERGENCY FEEDWATER INITIATION & CONTROL

4.0 REFERENCES

- EDBD TC No. 511 Sheet 4 of 4
- 105. Interoffice Correspondence, WPN84-0813, "Emergency Feedwater Valves 1, 2, 3, 4, 7 and 8 and Interface with EFIC RS Appendix R," September 28, 1984.
- 106. MAR 88-03-05-01 "System Tuning of EFW Control Valve Signal," dated July 26, 1989.
- 107. FPC Interoffice Correspondence NDB90-072, W. S. O'Brien to K. B. Baker, "Open Item Report 90-CM-EF-07," dated July 3, 1990.
- 108. FPC Calculation I85-0009, Rev. 3 "Dedicated EFW Tank Alarm Setpoints," dated September 9, 1992.
- 109. MAR 93-06-16-01, "NI-14 and NI-15 Modification for NI-1 and NI-2 Backup and AMSAC Setpoint Change."
- 110. MAR 88-07-05-04, "FWP-7 Mechanical Tie-Ins."
- 111. MAR 88-07-05-01, "Add Aux Feedpump, FWP-7."
- 117. MAR 96004-12-01, "ASV. ZOT ETIC AUTO GTEN DEMICIAL."



## PLANT DESIGN BASIS DOCUMENT TEMPORARY CHANGE Nuclear Engineering

TEMPORARY DIAMES MARKET

510

-	3. Doyel C.3 Doyel 5/30/96	APPECTED SECTIONIS: TAS NO.IS. PAGE NO.IS!
_	MS	6/10, pp33 and 38
	To be completed by Design Engineer	*:
	Temporary Change to: (Check one)	EDBD TC No. SID Sheet   of 4
	Design Basis Document (DBD)	EDBD TO NO. 370 CHEET T CT T
	Enhanced Design Basis Document (ED	OBD)
	Analysis Basis Document (ABD) NOTE: Concurrence by Nuclear Fuel & changed.	Management and Safety Analysis required if ABD is
		CURRENCE, MOR., MUCLEAR PUB, MOT. & BAPETY ANALYSIS
	☐ Topical Design Basis Document (TDB)	D)
	Effective date: (Check one)	
	This Temporary Change is effective	pon approval.
		ded in the appropriate document for information only
	until implementation of MAR/PEERE _	
	PRC Review required Yes No (If No, NA	A PRC Review)
	To be completed by CMI, except as noted in instru	uctions.
	YES N/A	
	1. Analysis / Calculation i	Form with Technical Justification included.
	2. Marked Up Pages of th	ne appropriate document included.
	covering the change is	valuation performed (Required If Safety Evaluation in not located in another document. If located in anothe document <u>MAR96-04-12-01</u>
	4. Nuclear Engineering Sa	efsty Impact Assessment performed. (Required if the change is not located in another document. If current, list source document
	5 Bayland Table of Control	note lockeded
	5. Revised Table of Conta	HILB BROOMS.
	CMI Review Cumments / Resolution:	
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	Comment / Resolution	
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## ANALYSIS/CALCULATION

Crystal River Unit 3

Page		-4	
Lena	_	_ 01	

EDBD TC 510

MAR 96-04-12-01

#### Statement of Changes:

- Remove the second sentence in the NOTE on p33 and replace it with the following, "ASV-204 is a remote manual operated valve providing a redundant steam admission valve to ASV-5."
- Reword the Reason/Source to reflect that only ASV-5 receives an open demand signal from EFIC.

#### Technical Justification:

This MAR is being driven by the performance requirements of 2 major components in the plant, the Steam Driven Emergency Feedwater Pump, EFF-2, and the "A" Emergency Diesel Generator, EGDG-1A. In 1987, while struggling with the question of how to meet the loading requirements for EGDG-1A after loading EFF-1 on it for a LOCA, concurrent with a Loss of Offsite Power (LOOP), and a "B" Battery failure, the solution was proposed, accepted, and installed to power ASV-204 from the "A" electrical train and initiate an automatic opening of the valve in the event of an EFIC actuation. By doing this, the load expected to be carried by EFP-1 would be minimized as EFF-2 would be running without any controls, i.e. at full speed. This was the only way that the projected load on EGDG-1A could remain within the rated capacity of the machine at that time. Since then, the upgrade of the diesel generators has been completed, and new electrical calculations show that EGDG-1A can handle the load of EFP-1 in this accident scenario. In addition, a concern about the NPSH requirements for EFP-2 not being set when the pump is running in this all out condition dictated that this automatic opening of ASV-204 be removed.

EDBD TC No. 5/0 Sheet 2 of 4

B Dry 1 Stofal

VERIFICATION ENGINEER

DATE SUPERVISOR, NUCLEAR ENGINEERING

DATE

## CRYSTAL RIVER UNIT 3 ENHANCED DESIGN BASIS DOCUMENT MAIN STEAM SYSTEM

### 3.0 COMPONENT PARAMETERS

EDBD TC No. 510 Sheet 3 of 4

#### COMPONENT/PARAMETERS

EF Pump Turbine Steam Inlet Valves Tag Mumbers: ASV-5. ASV-204

The valve opening stroke time is required to support the EF system achieving minimum flow within 50 seconds.

#### NOTE :

ASV-204 was installed to improve EFW reliability and is not required for operability. During an ES actuation coincident with a LOOP and failure of the "B" train EDG, it is relied upon to provide margin in the "A" train EDG loading.

MANUAL OPERTED VALUE

FRUIDING A RED-WORNT STEAM

ADMISSION VALUE TO ASIS

#### REASON/SOURCE

EFIC sends an open demand signal to the valves for Emergency 1.
Feedwater initiation. They must open fast enough to ensure that the EF system can successfully achieve its safety function of delivering flow to the OTSGs

within 50 seconds of actuation.

ASV-5

Reference: 30, 35, 36, 52

FSAR Section 10.2.1.4., 14.1.2.8, 14.2.2.9

INTERFACE

The EFIC (EC) system sends an "OPEN" control signal for Emergency Feedwater initiation.

Electrical Power: 250 VDC motive power from: ASV-5 DPDP-88 ASV-204 DPDP-8A

The HVAC (AH)
system maintains
compartment
temperature,
pressure, and
humidity within EQ
limits.
Key Parameters:
Heat Removal
(Btu/hr)

## ENHANCED DESIGN BASIS DOCUMENT MAIN STEAM SYSTEM

## 4.0 REFERENCES

EDBD TC No. Sie Sheet 4 of 4

- 46. FPC ICC. Nuclear Licensing C2M, Closure Memo, Crystal River Unit 3, SPIP Recommendations, 11/2/89 for SPIP Recommendation No. TR-174-MSS, "Improve the Response of the Modulating Turbine Bypass Valves (Atmospheric and Condenser Pump Valves)."
- 47. B&W Letter, dated March 2, 1992, FPC 92-096, Task 847, "ADV Stroke Time Requirements."
- 48. MAR 91-08-04-01, "MSIV Downstream Pressure Indication."
- 49. FPC IOC NEA91-1080, dated 8/5/91.
- 50. BWNS Report 86-1219188-00, "MSSV Setpoint Tolerance Evaluation."

52. MAR 96-04-12-01, ASV-204 EFIC AUTO OPEN REMOVAL

110F04 110M04 FLORIDA POWER CORPORATION CMIS - CLASSIFICATION DATA

DATE: 04/26/96 TIME: 08:26:02

#: ASV-204

PONENT: OPERATOR, MOTOR LOC: INTERMEDIATE BLDG

LOC:

TURB DRIVEN EMERG FWP INLET ISO

SYSTEM: AS DESIGN REF: IN-PLANT

ELEV: 95 COL/ROW: 308/H DISC: E

NPRDS REPORTABLE

PANEL BOX: ASV-204

ETY: S CHANNEL: A CODE: CODE KEY: L BB EX MR QQ

SEISMIC:

NOTES:

-HELP F2-SEL CRIT F3-MULTI LIST F7/8-TAG PAGE F9-FIMIS =PREV SCRN F11=MAIN MENU F12=LOGOFF F14=EQ F16=COMP F17=: =MARS F19/20=ASSC TAG MNR/MJR F21=COMMENTS F22=MACS WR LIST F16=COMP F17=XREF IGURATION ITEM DISPLAYED / THERE ARE COMMENTS TO DISPLAY

> MAR 96-04-12-01 MAR DESCRIPTION ATTACHMENT P1 6= 2

E110F04 E110M04

FLORIDA POWER CORPORATION CHIS - CLASSIFICATION DATA

ELEV: 95

DATE: 04/26/96 TIME: 11:30:02

#: AS-9

FOR EFW PUMP ISO VALVE ASV-204 SYSTEM: AS

DESIGN REF: IN-PLANT

PONENT: CONTROL STATION LOC: INTERMEDIATE BLDG LOC: ,

COL/ROW:

DISC: E

PANEL BOX:

ETY: S CODE:

CHANNEL: A

CODE KEY: L BB EX MR QQ

SEISMIC: NOTES:

1-HELP F2-SEL CRIT F3-MULTI LIST F7/8-TAG PAGE F9-FIMIS 0=PREV SCRN F11=MAIN MENU F12=LOGOFF F14=EQ F16=COMP F17=XREF 8=MARS F19/20=ASSC TAG MNR/MJR F21=COMMENTS F22=MACS WR LIST FIGURATION ITEM DISPLAYED / \*\* NO COMMENTS TO DISPLAY \*\*

> MAR 96-04-12-01 MAR DESCRIPTION ATTACHMENT p2 of 2



## FIRE PROTECTION REVIEW 5-8-90

To:	Senior Nuc	lear Fire Protec	tion Specialist	
	A copy of h	AR/CGWR_	96-04-12-01	FCN
	is attached	for your revie		ly compliance with National Fire Protection
	0	Does comply	with NFPA codes and standar	rds
	0		nply with NFPA codes and star diately to the Manager, :luclear	
	ka.	Annessa constituto	and standards do not apply	
	Comment	s:		
	8	-	•	
	2.00			
	Server Auch	L. R	ecsel	G-10-96

## FIRE PROTECTION REVIEW

## MAR/CGWR and FCN Sign-off Sheet

	MAR/CGWR _96-04-12-0/ FCN		_
		Yes	No
1.	Ensure MAR/CGWR/FCN has date-in stamp and is logged in SNS MAR/CGWR/FCN Logbook.	K	_
2.	Are major in-situ combustibles being installed?		X
	This may cause a change to the FHA or require new fire protection features.		
3.	Are large quantities of transient combustibles required by the MAR/CGWR/FCN?		X
	This may require compensatory measures to be put in place or special attention by the FNP Staff during the installation of the MAR/CGWR/FCN.		
١.	Will the MAR/CGWR/FCN cause breaching of fire barriers, fire doors, fire dampers, penetration seals, or TSI material?	_	*
	This will require a Fire Barrier Penetration Breach Permit and compensatory measures per CP-137 for Tech. Spec. Items, and will cause compensatory measures to be invoked per the Fire Protection Plan for non-Tech. Spec. areas or Items.		
	Will the MAR/CGWR/FCN need to incorporate "hot work" processes (welding, grinding, heat shrinking, etc.) to accomplish the MAR/CGWR/FCN?	_	X
	This may require Hot Work Permits in accordance with CP-118 to assure adequate fire protection features are in place.		
•	Will the MAR/CGWR/FCN cause a fire protection system (sprinkler, fixed water spray, Halon, CO <sub>2</sub> standpipe and hose station, or fire detection system) to be disarmed or taken out of service?	_	X
	This will necessitate compensatory measures in accordance with CR-3 Tech. Spec. systems, and will necessitate compensatory measures per the Fire Protection Plan for non-Tech. Spec. systems.		
	Will the MAR/CGWR/FCN cause any impact on the Fire Protection Plan or fire protection procedures?	_	X
	Ensure that the MAR/CGWR/FCN will not inpact fire protection procedures or cause a change to existing procedures or a need for a change to the Preventative Mainte- nance Program.		
	Does the MAR/CGWR/FCN comply with the pertinent NFPA code?	ALA	
	Ensure that the MAR/CGWR/FCN complies with the proper code, if required, and make sure the proper code is referenced and used in developing the MAR/CGWR/FCN. Fill out the sign-off sheet.		

CR3 005902

# FIRE PROTECTION REVIEW MAR/CGWR and FCN Sign-off Sheet (Continued)

		Yes	No
9.	Do the Engineering Review Sheets, including the Fire Protection Review Sheets, indicate an impact on Appendix "R" fire protection issues?	_	X
	Ensure that the proper personnel are involved and following up on the Appendix "R" modifications, and that this information is going into the Appendix "R" fire study.		
10.	Does the MAR/CGWR/FCN present special fire protection concerns that would warrant a review by the NFP Group upon MAR/CGWR/FCN completion?		<u> </u>
11.	Pertinent comments have been recorded in the Review Sheet's "Comments" section and the responsible Design Engineer has been notified.	<u>414</u>	_
12.	MAR/CGWR/FCN returned to Nuclear Projects for processing.		
13.	Mark logbook to reflect MAR/CGWR/FCNs that the NFP Group should review upon completion of the MAR/CGWR/FCN.		<u> </u>
Revi	lewed by A. T. Russell Date 6-10-	96	



## INSERVICE INSPECTION REQUIREMENTS

MAR _ 96-04-12-	0 / FCN
Preservice Requirement	s
☐ Acceptable	As specified in Paragraph
☐ Unacceptable	Needs to be revised per below or attached comments.  See FCN No
Inservice Requirements	As specified in ParagraphB. 7, C
☐ Unacceptable	Needs to be revised per below or attached comments.  See FCN No
Comments:	

Nuclear ISI Specialist

1/26/96 Date



## POST MODIFICATION FUNCTIONAL TEST REQUIREMENTS

□ No	o Func	tional Test Procedure Required
		No Post Modification Test required
	□ F	POQAM Procedure to satisfy test requirements
		Procedure No Sections
		Section Desc.
M E	AR Fur	nctional Testing Required (Select Option Below)
	0 V	York Request Test Instructions
		Enter Work Request Number
	Ø N	MAR Functional Test Procedure
		Briefly describe Trist will simulate an whole for
		EFIC Achorin A to verify that AS-204 DUCS NOT
		excent as input, and, all other functions associated
		with the Actuation sional continue to courate entiretiny.
omm	ents:	
omm	ents:	
Comm	ents:	
Comm	ents:	
omm	ents:	



# MODIFICATION/PEERE/PROCEDURE REVIEW Part A

existing within	your area of n	esponsibility	will need to b	Dealver ed	r review to det upon completi	ion of this act	way.
RETUR	N THIS FORM F YOUR REV	M TO THE P	ROJECTS DI OT ROUTE TO	EPARTME O THE NE	ENT (NA18) UI OCT PERSON (	PON COMPL ON THE LIST	ETION .
Nuc. Ops.	Specs, fl.e.	does having	the equipme	ent out of	ipment operab service require iode escalation	entering an a	d in Tech.
•	Yes	,	□ No				
			L	- 1	MAR/CGWR/Pi service during r	normal worldn	g hours.
					may be needed		
(May require Administrative out of short to needed until	eeds or mode re-evaluation e control of the term instruction return to service.	prior to work ne equipment on etc. may b fice is compli	king.) t Le., tag be eted.	ould be ha	service is comp	o Operations	to ensure
(May require Administrative out of short to	re-evaluation control of the term instructio return to service. The fi hat MAR/CGV	prior to work ne equipment on etc. may b rice is comple o service rec Project Mane NR/PEERE r	king.) t Le., tag be eted. guirements she ager, in cooper return to service	ould be he	and delivered to	o Operations	Mai rusouu nie
(May require Administrative out of short to needed until  MAR/CGWR/Pitimely return to Control Room to	re-evaluation control of the term instruction return to service.  EERE return to service. The fi that MAR/CGV ment operable	prior to work ne equipment on etc. may b rice is compli o service rec Project Mana WR/PEERE r e or mode cl	king.) t Le., tag be eted. guirements shager, in coope return to service	ould be ha	and delivered to	o Operations	Mai rusouu nie
(May require Administrative out of short to needed until MAR/CGWR/Pitimely return to Control Room to declaring equip	re-evaluation control of the term instruction return to service. The fi that MAR/CGV ment operable  Procedure List #	prior to work ne equipment on etc. may b fice is compli o service rec Project Mana WR/PEERE r e or mode cl	iding.) It Le., tag be eted.  guirements sha ager, in coope return to service hanges.	ould be haration with the required	and delivered to	o Operations n's Engineer, e accomplish	ed prior to
MAR/CGWR/Pitimely return to Control Room to declaring equip	re-evaluation control of the term instruction return to service. The fi that MAR/CGV ment operable  Procedure List #	prior to work ne equipment on etc. may b fice is compli o service rec Project Mana WR/PEERE r e or mode cl	iding.) It Le., tag be eted.  guirements sha ager, in coope return to service hanges.	ould be haration with the required	and delivered to the Operation ments are to b	o Operations n's Engineer, e accomplish	ed prior to
(May require Administrative out of short to needed until MAR/CGWR/Pit timely return to Control Room to declaring equipates No Yes No Yes No No Yes No No Yes	re-evaluation control of the term instruction return to service. The finat MAR/CGV ment operable  Procedure List # A Procedure	prior to work ne equipment on etc. may b fice is compli o service rec Project Mana WR/PEERE r e or mode cl	iding.) It Le., tag be eted.  guirements sha ager, in coope return to service hanges.	ould be haration with the required	and delivered to the Operation ments are to b	o Operations n's Engineer, e accomplish	ed prior to
(May require Administrative out of short to needed until  MAR/CGWR/Pitimely return to Control Room to declaring equip  No Yes	re-evaluation control of the term instruction return to service. The first MAR/CGV ment operable  Procedure List #  A Procedure List #  Comments	prior to work ne equipment on etc. may b fice is compli o service rec Project Mana WR/PEERE r e or mode cl	iding.) It Le., tag be eted.  guirements sha ager, in coope return to service hanges.	ould be haration with the required	and delivered to the Operation ments are to b	o Operations n's Engineer, e accomplish	ed prior to

Nuclear Plant Systems Engineering NoNo No		Procedure changes : List # Procedure changes : to MAR/CGWR/PEE Operations List #	are required prior RE Return to Service to
M. FITZGERALD	Est	3444	4/27/96 Dete:
Nuclear ISI No No No No	_YesN/A	Operations	
Phyllis A. Dixan	35	512	4/27/9 C Date
Nuclear Maintenanne NoNo	_ Yes N/A	Operations	
d. C. Hunsinger	5 6 6 Est.	53	Q-79.90 Date CR3 00590

5. Muclear Chem / Rad Prot.	No Yes		Procedure changes are required  List #
	No Yes _	N/A	Procedure changes are required prior to MAR/CGWR/PEERE Return to Service to Operations
Comments			List #
Print Name		Ext	Date
B. Nuclear Security	No Yes	-31-95	Procedure changes are required
	201		List #
	No Yes _	N/A	Procedure changes are required prior to MAR/CGWR/PEERE Return to Service to Operations
			List #
Comments			
Print Name		Ext.	Date
7. Nuclear Projects Specialist	No Yes	Р	rocedure changes are required and are identified
12 / 20 mg	rth		3/do 8 4.27.96
Print Mame		Ext	Date



# MODIFICATION/PEERE/PROCEDURE REVIEW Part B

AR / CGWR _ 96.04.12.0				
tructions: The attached MAR/CGW existing within your area	R/FCN/PEERE is rou of responsibility will n	ted to you for your revi eed to be revised upon	ew to determine if procedures completion of this activity.	
	REVIEW, DO NOT RO	OUTE TO THE NEXT P	NA1B) UPON COMPLETION ERSON ON THE LIST. Changes are required	
(Cire Orinternal Commoso	ony .	List #		_
ease indicate any EQ (10CFR50.49) this modification.	requirements which m	ust be incorporated into	the MPs / PMs upon completion	1
No New	reguireme	ate		
				_
	✓No _	Yes EQ Walkdoo return to se	wn required prior to MAR/PEERE	
yes, list all components/tag numbers			2 980	
ock package	- of to	- ine/ 6/	ick tarque per	_
cork package	instruction	s stistic	· EQ Rant.	_
n. H. Kinel		3285	1/27/86	
nt Name	1	Ext.	Date	
Reliability Centered Maintenance	. <u>X</u> No	Yes Preventative	Maintenance changes are require	d
				_
0 /				_
CANTINE			4/29/96	

Nuclear Fire - Protection Specialist	NoYes	Procedure changes are	
J.L. Russell	34 Ext.	3 <i>.</i>	4/29/9( Date
Others	No Yes	Procedure changes are	
Print Name	Ext.		Date .
i. Dthera	NoYes	Procedure changes are	beniupen e
Print Name	Ext.	•	Date
Project Manager  R Bosworth  Print Name	No _Yes	Procedure changes are	required 29/96

	на	EVALUATION 1		
MAR MUMBER	6.04.12.0	/-		
MAR TITLE:	ASV-204	EFIC	Auto apr	Phonostar
RPAESTIMATE	Norot	LABOR	MATERIALS	IOTAL
ACTUAL COST	461			467
EA'S: (i.e. reason, c	ause) None	٤		
There	VEMENT: (i.e. Schedu		Mign, Testing)	CO MAR
AR STRENGTHS:	J06 4	rent i	vell	

.



# RETURN TO SERVICE OF EQUIPMENT FOLLOWING MODIFICATIONS

0		. 2	
MAR/CGWR/PEERE 9604 NUMBER OF	FCNs TEMPORARY MAR INSTA	LLED NA RE	MOVED MA
RETURN TO SERVICE:	FULL PARTIAL	1	/
PROJECT NAME ASV-204	EFIC Auto Opa	EN KAME	WAL
DESCRIPTION OF BOUNDARIES	MA		
REQUIREMENTS FOR RETURN TO SERVICE		YES	N/A
Exhibit 15 reviewed to assure engineering desi	gn requirement satisfied.	'PR'	
Walkdown and System Acceptance (WSA)		Ø	
Functional Testing/Post Maintenance Testing (	Complete	X	
Procedures Required for Return to Service Rev	rised	( _	æ
Training is Documented		X	
Revised Control Room Drawings Available in th (201 sheets 61-71 / 206 / 208 / 220 sheets 22		×	
REA/Memo received verifying partial return to	service evaluated by Engineering.	ø	X
ABOVE REQUIREMENTS ARE SATISFIED:	E. Bowner	57	8/96
	Nuclear Project Manager	Date	)
RETURN TO SERVICE ACCEPTED/ANY ADMIN	V. CONTROLS REQUIRED UNTIL CLOSE	URF WILL BE MA	UNTAINED:
	mtDill	= 1	
i d	Operations Designee	Date	8-92
		5410	
DMINISTRATIVE REQUIREMENTS IN PLACE/LI	ST:		
-		CR	3 005912

PART I (INSTALLATION SUPERVISOR)

THIS FORM IS TO BE USED BY THE WORK GROUP SUPERVISOR TO RELEASE THE MAR/CGWR AFFECTED EQUIPMENT BACK TO NUCLEAR PROJECTS AFTER MODIFICATION INSTALLATION. LIST THE AFFECTED WORK PACKAGE NUMBERS AND THE WORK STATUS (I.E. COMPLETE, NEED ISLT, ETC.) IN PART 1 AND DELIVER THIS FORM TO THE PROJECT MANAGER OR RETURN IT TO NUCLEAR PROJECTS.

ORK PACKAGE NUMBERS AND STATUS _ 3=	5012 PAKAG COMRENE
	SECOND 1
0130	
R/CGWR INSTALLER SUPERVISOR OR PROJE	CT MANAGER DATE
PART 2 (PROJECT MANAGER)	• \$7A.7 •
IS A WILEDBAR OF THE INSTALLA	17100
NO DO REBURES OF THE PROJECT MADAGE	MES ( )
AND THESE ART PRODUCES OF EXCEPTIONS MOTERS AT THE INSTALLATION SUPERVISOR OF WALKSOOM	MALTERNA IS CONFLETED AND ANY PROBLEMS HAVE BEEN ROCKNESTED
mp() (1)	OCCUPENT BLOGES
ALL PROBLEMS/EXCEPTIONS MAVE BEEN REVIEWED TO BETERMINE THE FOLLOWING:	PENSONES IT GUE
1.( ) MIET OF CHARLETED POICE TO STARTING PESTING	
E.( ) MAY BE CONNECTED AFTER TESTING MAS STARTED	1
INSTALLER SUPCETION BASE	1+2
PALECT MANUEL BANK	1
PRILET MANEE SORE	J
Ca Dosward 429/01	<b>≈</b> ()
PROJET NAMES WILL / 70	1
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ACT TO SEE THE PROPERTY CONTINUES OF THE SEED OF	1
PROJECT MANUEL BATE	1
AL PERSON STORY	
ALL TESTIMS ACTORS FOR RETURN TO PROVES TO	ALL PRODUCTED AND THE SECURE SECURITY OF THESE WORK PRODUCTED AND THE SECURE SECURITY OF THE SECURE SECURITY OF THE SECURITY O
. Draws th 5/abs	Comment of Second Long to State Line of Second Lines



# COMPLETION OF MODIFICATION TESTING NOTICE

MAR Testing Requirements: Yes No (As specified by Test Engineering)	
MAR Functional Test Procedure(s):	TP Complete
Work Request Test Instructions:	
POQAM Procedure(s): List:	Complete
AR ISI Requirements: Yes No SP-3	49 B Complete
AR Examination Requirements: Yes	No Swing of the Complete
est Maintenance Testing Listed Yes	EC.,
MAR / CGWR related work request(s):  List:	Complete



## PROCEDURE HOLD NOTIFICATION

TO:

DOCUMENT CONTROL

SUBJECT: NOTIFICATION FOR PROCEDURE HOLD

THE FOLLOWING MODIFICATION OR EQUIVALENCY REPLACEMENT HAS BEEN INSTALLED AND AFFECTS PLANT PROCEDURES.

PLEASE PLACE THE LISTED PROCEDURES ON HOLD UNTIL THEY ARE REVISED TO REFLECT THIS MODIFICATION/EQUIVALENCY REPLACEMENT OR, IF AUTHORIZED, USE "AS IS" BY THE INTERPRETATION CONTACT.

MAR/CGWR No: 96 - 04 - 12 - 01 -
PEERE No:
AFFECTED PROCEDURES:
SP-349A
PROJECT'S REPRESENTATIVE
CC: INTERPRETATION CONTACT These provides OK to use
These procedures on to use "as is". Frank Dula pertelum of/26 RECEIPT ACKNOWLEDGEMENT BY:
S. Bonemeier

NUCLEAR DOCUMENT CONTROL SUPERVISOR/DESIGNEE

		PROCEDURE RE	VIEW RECORD	(page 1 of 3)	
PRR	Proc #	Current Rev #	Title:		
DESCRIPTI	ON OF NEW PRO	OCEDURE OR CHANGE (		249 A	
REASON A	ND REFERENCES I	OR PROCEDURE CHAN	Sp-	349 A 840 A — 2 to —	
-PRNR→ -Enclose □ Biennial -PRNR-I	A previously subm ure 23 of AI-402B I Review conducte B (Enclosure 10) a	d prior to normal review	•	sure -	
□ Plant M	odification: MAR	Number			
C Non-Co	nformance: Fi	nding number and date _			
☐ Technica	al Specification An	nendment: Specification i	Number		
Originate	ed By		Title	Date	_
Final Pr	ocedure Appr	ovals			
Interpre	tation Conta	ct		Date	-
Not Red					-

## NOTIFICATION OF NEW/REVISED PROCEDURE

Proced AP-770	T. T. W.	PRR #11482		
			Revi	ewed
	Check		Initial	Date
To:		Manager, Nuclear Chem/Rad Protection		
	V	Manager, Nuclear Plant Operations		
		Supervisor, Nuclear Engineering Support Services		
		Manager, Nuclear Plant Technical Support		
		Manager, Nuclear Security		
		Supervisor, Nuclear Document Control		
		Supervisor, Nuclear Records Management		
		Manager, Nuclear Plant Maintenance		_
		Manager, Nuclear Quality Assessments		
		Manager, Nuclear Engineering Design		
		Manager, Site Nuclear Services		
_		Manager, Radiological Emergency Planning		
		Manager, Nuclear Licensing	,	
_		Procedure Interpretation Contact D. de Mo	not fort	
	√	Manager, Nuclear Licensing Operator Training		
		NOTE: For others below, state cheir name and address Other:		
		Other:		

NOTE: This procedure has been approved and issued for use. It is your responsibility to advise personnel in your organization affected by this new/revised procedure of its contents. Attached is a copy of the Procedure Description, Reasons, and References (Enclosure 2).

3.29 Changed step obtain guidance from TSC if diesel fuel reserves will not be adequate to run 2 EDGs at 12 hours following an accident. Changed guidance from 10 hours at the ahour point in the accident to 12 hours from the start of the accident measurement and represented from processes for processes. Guidance for diesel fuel management belongs in TSC as this becomes a concern 12 hours after a loss of offsite power.	
Check As Appropriate:	Reference#
[✔] Modification [] FCN [] Other Design Related Item	MAR96-03- 12-01 MAR96-04- 12-01
[ ] Problem Report [ ] Precursor Card [ ] NRC Violation	
[ ] ITS Amendment [ ] ITS Bases Change [ ] FSAR Change	EÉ

## PROCEDURE DESCRIPTION, REASONS, AND REFERENCES

Procedure #: AP-770

PRR #: 11482

## DESCRIPTION OF NEW PROCESURE OR CHANGE (Detailed

3.1 Changed SOTA to STA

3.5/3.6 split original step into two steps

### REASON AND REFERENCES FOR PROCEDURE CHANGE

Editorial changes to comply with AI 402A

### DESCRIPTION OF NEW PROCEDURE OR CHANGE (Datalog)

3.4 added new step to increase EDG voltage if voltage is too low to make up the READY matrix

## REASON AND REFERENCES FOR PROCEDURE CHANGE

provide additional guidance to reenergize a dead bus

### DESCRIPTION OF NEW PROCEDURE OR CHANGE (Detailed)

Table 1 Changed EDG Ratings to agree with Calculations for MAR 96-03-12-01 for the new EDG KW indicators REASON AND REFERENCES FOR PROCESURE CHANGE

These values had not previously been error corrected and are required to be so for load management.

## DESCRIPTION OF NEW PROCEDURE OR CHANGE (Detailed)

Tables 2 and 3 changed to Enclosure 1 and added starting KW loads values

### REASON AND REFERENCES FOR PROCEDURE CHANGE

Required information would no longer fit on facing page.

## DESCRIPTION OF NEW PROCEDURE OR CHANGE (Detailed)

3.7 added new step to provide guidance when EDG load rating limits are challenged. References a new Enclosure 2 to Cross-connect EFP-2 to EFV-57 and 58 if EDG-1A limits are challenged and EFP-2 flow indication is not available REASON AND REFERENCES FOR PROCEDUME CHARGE

Insufficient available load exists on EDG-1A during some accident scenarios. This new enclosure provides the operator with guidance that will allow shutting down EFP-1 to provide sufficient operating margin to handle Starting KW of manually applied loads.

#### DESCRIPTION OF NEW PROCESURE OR CHANGE (Detailed)

3.9 Changed Letdown recovery to reference EOP-14 for consistency

REASON AND REFERENCES FOR PROCESURE CHANGE

Consistency

### DESCRIPTION OF NEW PROCEDURE OR CHANGE (Dotaled)

3.10 Added step to provide guidance to reenergize a faulted bus when repairs are complete REASON AND REFERENCES FOR PROCEDURE CHANGE

Provides guidance that did not previously exist for recovering a faulted bus

#### DESCRIPTION OF NEW PROCEDURE OR CHANGE (Detailed)

3.11 Moved steps to restore a failed EDG to Enclosure 3 REASON AND REFERENCES FOR PROCEDURE CHANGE

The required guidance exceeded one page. Moved to Enclosure to comply with AI-402A.

### DESCRIPTION OF NEW PROCEDURE OR CHANGE (Datalled)

3.12 Reworded step to be consistent with EOPs REASON AND REFERENCES FOR PROCEDURE CHANGE Consistency

#### DESCRIPTION OF NEW PROCEDURE OR CHANGE (Datalled)

Various Steps. Additional information concerning starting KW load has been added.

REASON AND REFERENCES FOR PROCEDURE CHANGE

implementing requirement to prevent exceeding 3500 KW during equipment start.

## DESCRIPTION OF NEW PROCEDURE OR CHANGE (Detailed)

3.19 Reworded step to be concistent with EOPs REASON AND REFERENCES FOR PROCEDURE CHANGE Consistency

## DESCRIPTION OF NEW PROCEDURE UR CHANGE (Detailed)

3.25 Changed details to direct starting CC emergency recirc per EOP-3 if adequate subcooling margin does not exist.

Guidance for starting CREVS is required in EOP-3. This will prevent any interlocking of AP-770 and EOP-3

232
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34.67
orida
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## DATA TRANSMITTAL

PLE CODE/IS	The state of the s
MAR 96-04-12-	01
ASV-204 EFIC	AUTO OPEN REMOVAL

orida			PROJECT						
wer	SHE	ET	PANT	ASV-204 EFIC AUTO C	PEN R	EMOVAL			
				CRYSTAL RIVER UNIT	#3				
TYPE OF DATA  CWP  Eng. Study or Rec.	STATUS OF DA	ACTION TO BE    Receipt/Acimon   Approve & Retu	vledge	RETURN COMMENTS TO:	No. Cop's OR	Route To CSS	Pur posi S/F		
nstruction Manual Prints/Drawings	Revised (DCN or I	See *Special			No. Cop's	Distribution	Pur-		
Specifications Other	Rev.)  Approved/Accepte	E New Data for F	lle	BY DATE:	18	CSS	MF		
	Other	Comments Certify			5AC	RHC			
M. ASTRUCTORS		DOther			1AC	PP	**		
					1AC	FT	**		
BUILT PER MAR 96	-04-12-01				DTS	KFL			
				(1					
							_		
DOCUMENT NUMBI	REV REV		т	TLE OR DESCRIPTION					
		SEE ATTACHED FO	R LIST (	OF DRAWINGS					
	^	DOITIONAL COMMENTS OF	I INSTRU	OCTIONS	-	·	$\dashv$		
9'S - 3P RHC 9'S - 3P RHC 9'S - 1P RHC									
P (Parsons Power) T (Framatome Tech	- 201, 205, 206, 207 nologies) - 205, 206	7, 208, 209, 210, 302, & : 3, 302, & 308 ONLY	308 ON	LY					

et. Blackman	5/7/96	Larry	Machielal	5/7/96	Chino	Atom	5/7/96
	P. E. BOICHUM		LEMMEN	D	LES	NAME OF TAXABLE PARTY.	

DRAWING NO.	REV#↓	1 6034	96-04-12-01						
209-008, AS-06	8		x			Sin zkom			
210-124	31		х	1	1				$\top$
210-619	19		x						$\top$
210-624	46		X					1	
211-008, AS-06	5		X	10420					$\top$
500-061, SH. 4	2		X						$\top$
500-066, SH. 5	3		X				T		T
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		TV OF							
						_			



CWP

Other

TYPE OF DATA

Eng. Study or Rec.

Instruction Manual

Prints/Drawings

Specifications

CAL PISTPLICTIONS

I'S - 6P RHC

## 14-DAY DWGS DATA TRANSMITTAL SHEET

STATUS OF DATA

Revised (DCN or Flant

☐ Approved / Accepted ☐ Other

Preliminary

O Interim

As-built

Rev.)

FEB	04/30/96	
MAR 96-04	1-12-01	
ASV-204 EF	IC AUTO OPEN REMOVA	L

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OR

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Poute To

Distribution

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CSS

5AC RHC

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CRYSTAL RIVER UNIT #3

RETURN COMMENTS YOU

BY DATE:

-BUILT PER MAR 96-04-12-	01	DTS	KFL	
		•	SEE BELOW	
DOCUMENT NUMBER	REV	TITLE OR DESCRIPTION		
08-008, AS-07 08-026, EF-15	9	TURB DRIVEN EMERG FEED PUMP INLET ISOL VLV ASV-204 EFIC MATRIX "A" CONTROL AND EFW ACTUATION "A"		

ADDITIONAL COMMENTS O' INSTRUCTIONS

P (Parsons Power) - 201, 205, 206, 207, 208, 209, 210, 302, & 308 DRAWINGS ONLY

T (Framatome Technologies) - 205, 206, 302, & 308 DRAWINGS ONLY

ACTION TO BE TAKEN

☐ Receipt/Acknowledge ☐ Approve & Return ☐ See \*Special

New Data for File

Review & Submit Comments

Instructions"

Certify

24. Blackman \$30/96 Farry Marketed 4/30/96 This A Sterrer 4/30/96



# MAR/CGWR/PEERE DRAWING / AS-BUILT UPDATE

To:	Supe	ervisor, Nuclear Design Support se initiate MAR/CGWR/PEERE drawings and "As-Built" requirements as per the below condition
/		CGWR/PEERE 96-04-12-01
4	Q	Temporary modification removed.
		Permanent MAR/CGWR/PEERE is expected to be completed within 14 days, please update the fast turn around drawings.
1	R(	Permanent MAR/CGWR/PEERE is complete and return to service is in process or accepted by operations, please initiate the "As-Built" requirements.
		MAR/CGWR is partially installed and is currently in progress or on hold. please update the necessary plant drawings to reflect actual conditions.
		Work Package No.(s) 335012
		Partial Installation consists of:
		Fast Turnaround MAR/CGWR/PEERE Drawings
		302/201 (061-071) / 206 / 208 / 220's (221-226)
		drawings are affected: Yes No
		11 yes, list: 208-008 AS-07
		208-026 EF-15
		Fast Turnaround FCN Drawings
		302/201 (061-071) / 206 / 208 / 220% (221-226)
		drawings are affected:Yes No
		(
		20 /
		5 / Sant 1/20 61
	4	Action Projects Specialist Date 17027/76
	E	RECEIPT OF DOCUMENTATION
		Thus D. Alleria 4/29/96



# COMPLETION OF ENVIRONMENTAL QUALIFICATION (EQ) NOTICE

EQ	Complete Complete requirements is fied prior to	must be	Partial  Yes	□ No		
D	escription of F	artial Modif	fication Turnove	r		
-						
_						
-						
R Title:	45V-	204	EFIC	Auto G	ben & Es	noval
Environm	vental Qualific	etica (EO)	aquirements av	er 10CFR50.49 f	or the subject. I	(AB house been
factorily	completed.	(20)	equirentia p	1001100.47	or the subject ?	TAK BAVE DEED
	.1		/			
als :	11/1/	1. 1	8		4/27/	

Upon completion, return to the Nuclear Projects Department (NAIB)



## "FAST RETURN TO SERVICE" MODIFICATION DRAWING UPDATE NOTICE

10	11	21	_ /
MAR/CGWR_	96-6	14-12	01
Control Roc	m drawing updati	ing is required.	

Applicable Drawings:	208-008,	15-17	
	208-026,	EF -/3	

The applicable "Fast Return To Service" MAR/CGWR drawing(s) have been transmitted to Document Control for Control Room updating.

Dosworth 5/8/96

Dosworth Projects Manager

S-8-96

Dosworthent Control

Date



## COMPLETION OF MODIFICATION TRAINING NOTICE

Comple	te Partial • ios of Modification Boundaries:
MAR/CGWR Title:	ASV-204 EFIC AUTO OPEN Removal
Training required:	Yes No
COMMENTS:	prior to startup Training Complet
Muse Operations Trains	milk per telecon \$\f29/96

Upon completion, return to the Projects Department (NAIB)



## MAR TRANSMITTAL

96-04-12-01		TRANSMITTAL DATE (To be entered by Propost M. 4-27-96	Magari
ASV-204 EFIC Auto Open R	emoval		
EMPORARY MAR EXPIRATION D			
Personal Company of the Company of t	YES   N	0	
1100 CO 1100 C	YES N		
ROJECT TEAM ENDORSEMENTS	(PM may NA wit	h justification for projects > \$50,000	)
MAINTENANCE:		OTHER:	
THER:		OTHER:	
ROJECT MANAGER: VI POU	ax / 566	OTHER:	
USTIFICATION FOR NA:			
RC REVIEW REQUIRED: A RC CHAIRMAN: RC MEETING NUMBER: 96-2	YES NO	O Aldreck PAC Blowinson	
RC Approved	Character		DATE
lafetien Authertrad	NUCLEAR PLANT MAN	uogn	W La Age
restistion Authorized	HUCLEAR PLANT MAN	AGEN	0ATE
TRIBUTE, AS FOLLOWS: r., Nucl Projects w/orig. & 5 copies; w/3 -3 Document Control w/sttach; w/3 e/c zons w/1 e/c and Sec. B of T.O.C. matone w/1 e/c and Sec. B of T.O.C.	eets dwgs.	Supervisor, Nucl Eng (Elec.) w/ettech end dwg EDG Review YES NO Elec. Calc Review YES W NO	90.



## **MAR APPROVALS**

Crystal River Unit 3

Di Di Berner	10-			
Confirmat	tion Walkd	own (Optio	nal) 📙 Yes 🖆 No	
REQUIRED SIGNATURES			015	¥7
Design Engineer	X Yes	(FD)	Design Engineer	4/26/9 1 Date
EQ Reviewer	🛛 Yes	200 4/2 No	Michigan Kincl	4/26/9 1 Date
Fire Protection Engineer	☐ Yes	⊠ No	Fire Protection Engineer	/ Date
Nuc Plant Technical Support	X Yes		Polat X Haysi	4/26/ / Date
Nuclear Plant Operations	▼ Yes		Call W Beigstion	4-24- / Date
Site Welding Engineer (Optional)	☐ Yes	⊠ No	Site Welding Engineer	/ Date
Verification Engineer	Yes	□ No	Marchese Perification Engineer	4/26/96 Date
Verification Method Used:			Design Review Alternative Calculations Qualification Testing	



## **DESIGN INPUT RECORD**

Crystal River Unit 3

MAA NUMBER				Sheet 1 of 1
96-04-12-01	☐ Electrical	☑ I&C	☐ Mechanical	Structural

- 1.) This MAR is being driven by the performance requirements of 2 major components in the plant, the Steam Driven Emergency Feedwater Pump, EFP-2, and the "A" Emergency Diesel Generator, EGDG-1A. In 1987, while struggling with the question of how to meet the loading requirements for EGDG-1A after loading EFP-1 on it for a LOCA, concurrent with a Loss of Offsite Power (LOOP), and a "B" Battery failure, the solution was proposed, accepted, and installed to power ASV-204 from the "A" electrical train and initiate an automatic opening of the valve in the event of an EFIC actuation. By doing this, the load expected to be carried by EFP-1 would be minimized as EFP-2 would be running without any controls, i.e. at full speed. This was the only way that the projected load on EGDG-1A could remain within the rated capacity of the machine at that time. Since then, the upgrade of the diesel generators has been completed, and new electrical calculations show that EGDG-1A can handle the load of EFP-1 in this accident scenario. In addition, a concern about the NPSH requirements for EFP-2 not being met when the pump is running in this all out condition dictates that this automatic opening of ASV-204 be removed.
- 5.) ASV-204 is classified as Essential Equipment and as QQ. This modification will delete the EFIC Actuation automatic opening of the valve. The valve will remain QQ as it will be used as a remotely operated valve. This valve provides redundancy within one train of Emergency Feedwater, but is not required for redundancy of the other train. This MAR will remove the automatic opening and the active designation from SFD 600-061 sht 4 and 600-066 sht 5, showing it as a passive component. The 10CFR50.49 qualification will not be affected.
- 13.) REA 96-0467 provides the new calculation demonstrating that EGDG-1A will handle the electrical load resulting from eliminating the automatic opening of ASV-204 and the running of EFP-2 in the above referenced scenario. It should also be noted that this scenario is bounding for the other scenarios where the EDG's are required, i.e. Main Steam Line Break, Feedwater Line Break, etc.
- 15.) The current ongoing EOP revision program has identified that the Operator action on seeing this scenario and the initiation of EFP-2, without flow control and indication, would secure EFP-2. This MAR relieves the operator from facing the scenario of having the pump operational without any flow control of indication.
- 18.) ASV-204 provides a redundant steam admission valve to the EFP-2 turbine, redundant to ASV-5. Removal of the automatic opening of ASV-204 doesn't eliminate the redundancy as the operator will still have the capability to open the valve manually. This capability will also continue to be from the "A" electrical train, whereas ASV-5 is powered from the "B" electrical train. It is noted that this redundancy is in one train only and does not affect the redundancy of having the other train of Emergency Feedwater.
- 22.) AS-9, The local control station is located in ALARA Zone III.



1/94

## MAR PROGRAM IMPACT ASSESSMENT

Crystal River Unit 3

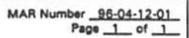
	5-04-1		
	YES	NO	
		×	The MAR affects an NPRDS reportable item or adds a new component or item.
		×	The MAR affects an MOV component or affects the differential pressure calculations for an MOV.
		×	The MAR affects the ES System Hydraulic Calculations.
		×	The MAR affects the Electrical System Calculations.
	$\square$		The MAR affects EDG loading.
		×	The MAR affects the Regulatory/Environmental Review form.
		X	The MAR adds or relocates Control Room equipment entailing direct operator interface that requires Human Factors design review per criteria stated in NUREG-0700 and/or adds, deletes or modifies any other equipment which could affect the characteristics of plant operation as displayed to the plant operator.
		×	The MAR affects the Control Room Habitability Envelope.
		×	The MAR represents a repair or replacement which is governed by ASME Section XI, IWA-4000 or IWA-7000, respectively.
		×	The MAR will delete or modify inputs to the Safety Parameter Display System (SPDS).
1.		×	The MAR affects exterior physical structures in the protected area and/or within 20 feet outside the protected area.
2.		×	The MAR contains equipment that will be part of or affect an instrument loop located in a harsh environment.
		×	The MAR affects SBO requirements.
		×	The MAR affects HELB requirements.
		$\boxtimes$	The MAR affects NI or calorimetric instrumentation and/or results in configuration changes which affect NI/calorimetric instrument readings.
-60		$\boxtimes$	The MAR affects hardware or software associated with the transmitting of Emergency Response Data System data points.
		×	The MAR affects Fire Protection Review requirements.
l.	$\Box$	×	The MAR modifies an item that:
			a. was originally procured and installed in an unmodified state.
			b. is being procured as part of this modification and will be modified after receipt; or
			c. is currently in inventory (FIMIS) in an unmodified state and will be modified prior to installation and/or restocking; or
			d. will be completely or partially replaced by an item of different design or materials.
٠	님	×	The MAR requires duplicate ordering of parts for the Simulator.
	$\boxtimes$		The MAR requires a Plant Design Basis Document change.
•	님	X	The MAR affects an MCB Panel, Rack or Cabinet Bill of Material.
	H	X	The MAR requires the ordering of spare parts.
	Н	X	The MAR requires a change to the Configuration Management Information System data.
		X	The MAR will add digital equipment of any kind to the plant.
		×	The MAR changes safety related fuse curve(s) contained in the Electric Design Fuse Time Current  Curves or adds a new safety related fuse to CR3.  CR3.005931
			CR3.005931

RET; Life of Plant RESP; Huston Engineering 802 003



# EMERGENCY DIESEL GENERATOR LOADING JUSTIFICATION

per NRC ows:	condition C regulati	after a de ons (e.g., F		nt. EG, IE Bulletin, etc.). requiring to be EDG
per NRC	C regulati	ons (e.g., F	eg. Guide, NURE	EG, IE Bulletin, etc.).
per NRC ows:	C regulati	ons (e.g., F	eg. Guide, NURE	EG, IE Bulletin, etc.).
y analyz	ted and d	ocumented		
y analyz	ted and d	ocumented		
			in the FSAR as i	requiring to be EDG
the mos	t boundi	ng case as	the previous bou	nding case is no long
load):	adde	Full EFY	flow load	D deleted
Δ Δ		В		
cont	tinuous d	uty [	Intermittent	duty
: X	auto-los	Led [	manual loade	ed
nt when	item sho	uld be lose	ed:	
iker by I	tag numb	REA	96- 0467 HAS	RECALCULATED THE
		- 15 AS	BOUNDING CASE FOLLOWS:	AND THE LOADING
		E 484	IA CT BLOCK	
		EANA	IN IMMUTE	LAMBING = 3159.1
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DATE	(Della	SOR HUBLENA S	ometyno is tessected	DATE
	load):  A contequipment of the context of the conte	ioad): added  A Continuous de equipment will be cross tied a continuous de equipment en equipment e	added Full EFW  A B  Continuous duty  equipment will be energized fill be cross tied and used to  auto-losued  twhen item should be load sker by tag number or device REA  Most 15 As  E 454.  E74 L	continuous duty intermittent equipment will be energized: 100% until LP fill be cross tied and used to provide EFW flor  :





## MAR OPEN ITEMS Crystal River Unit 3

EDBD Ch	ange to Chapt	ers 6-10, Re	v. 5 and 6-1	3, Rev. 3	
Field	Wirk P.	ackage	vi -		



## MAR **TABLE of CONTENTS**

Crystal River Unit 3

Page 1 of 1

96-04-12-01

#### Section A - MAR Inclusions

MAR Open Items (1 sheet)
 MAR Description / 10CFR50.59 Screening (5 sheets)

3. Nuclear Engineering Safety Impact Assessment (1 sheet)

Installation Instructions / Considerations (2 sheets)
 Design Data Sheets (2 sheets)
 Design Input Record (1 sheet)

7. MAR Program Impact Assessment (1 sheet)

8. Checklist for EQ Document Review (2 sheets)

Emergency Diesel Generator Loading Justification (1 sheet)
 IOC NED96-0272, FSAR Change per MAR 96-04-12-01 (5 sheets)

11. Regulatory/Environmental Review (3 sheets)

## Section B - Drawings

1. Installation Drawings (All Interim Rev. A)

208-008, AS-07

208-026, EF-15

209-008, AS-06

210-124

210-619

210-624

600-061, sht 4

600-066, sht 5

#### 2. Sketches

None

3. Drawings to be As-Built

> ss-211-008, Sheet AS-6, Rev.4. As Build circuit ASE36, change wire mark of conductpor #4 to 11. Circuit ASE37, spare conductors 1,2,3,4.

Reference Drawings (not attached)

None

#### Section C - References

1. REA 96-0467

2. FSAR Sections 7.2.4 and 10.5.2, Rev. 22

3. EDBD Sections 6-10, Rev. 5, and 6-13, Rev. 3 4. ITS 3.3.11, 3.3.12, 3.3.13, 3.3.13, 3.7.5, Amend 151



## MAR DESCRIPTION/10CFR50.59 SCREENING

	Safety Related Yes No No Safety Classification Basis
	Configuration Management Information System (CMIS)
	Screen Print
	☐ Drawing(s) Used:
	Safety Classification Review form (List CIDP Number if not attached) (CIDP #
De	cription of MAR
_	MAR removes the EFIC Auto Open signal from the EFIC "A" Channel on ASV-204. In addition it will
ren	ove the interlock that prevents the closure of ASV-204 when there is an EFIC actuation.
_	
100	FR50.59 Screening for Applicability (Review NEP 210, Exhibit 4, prior to response).
	is this a change to the facility as described in the FSAR?
	Is this a change to the facility as described in the FSAR?  X Yes No
	is this a change to the facility as described in the FSAR?
	Is this a change to the facility as described in the FSAR?  X Yes No
	Is this a change to the facility as described in the FSAR?  Yes No  List FSAR Section(s) Reviewed:  Significant of the facility as described in the FSAR?
1.	Is this a change to the facility as described in the FSAR?  Yes No  List FSAR Section(s) Reviewed:  Significant of the facility as described in the FSAR?
1.	Is this a change to the facility as described in the FSAR?    Yes
1.	Is this a change to the facility as described in the FSAR?    Yes
1.	Is this a change to the facility as described in the FSAR?    Yes
1.	Is this a change to the facility as described in the FSAR?    Yes
1.	Is this a change to the facility as described in the FSAR?    Yes
1.	Is this a change to the facility as described in the FSAR?    Yes
100	Is this a change to the facility as described in the FSAR?    Yes
1.	Is this a change to the facility as described in the FSAR?    Yes

If "Yes" to items C.1, C.2 or C.3 perform a 10CFR50.59 Safety Evaluation (Exhibit 4, Part II) and provide notification to the Manager, Nuclear Licensing per NEP 210, Instructions for Part I Exhibit 4.



# 

R	T II - 10CFR50.59 Evaluation
	Review NEP 210, Exhibit 4, Instructions before completing Part II. All "Yes" and "No" answers must be explained.
	Is the probability of occurrence of an accident previously evaluated in the FSAR increased?  Yes No
	Eliminating the automatic opening upon an EFIC actuation of ASV-204 will not impact the probability of
	occurrence of any of the accidents analyzed in Chapter 14 of the FSAR. Those accidents involve the
	failure of large plant components and none of them are started by failure of the control circuitry for
	ASV-204. FSAR Chapter 14 reviewed.
	Are the consequences of an accident previously evaluated in the FSAR increased?  Yes No
	The accidents that the opening of ASV-204 is involved in are any that involve an EFIC initiation. Since they
	all take a concurrent LOOP, this involves every one of them. The only single failure that may require ASV-
	204 to automatically open is a failure of ASV-5 to automatically open. Any single failure that causes ASV-5 to
	not open precludes a single failure that would effect the "A" Emergency Feedwater Train. Since the "A" EFW
	train would be available to mitigate the consequences of any postulated accident, the consequences of that accident would not be increased. FSAR Chapter 14 reviewed.
	Is the possibility of an accident of a different type than any previously evaluated in the FSAR created?  Yes No
	Since this MAR takes out the capability of ASV-204 to open automatically, it actually decreases the possibil-
	ity of an accident of a different type than any previously evaluated in the FSAR, as ASV-204 cannot
	spuriously open as a result of a failure in that circuit. FSAR Section 10.5.2 reviewed.
	Is the probability of occurrence or malfunction of equipment previously evaluated in the FSAR increased?  Yes No
	ASV-204 becomes a redundant manually operated steam admission valve to EFP-2. This does not impact the
	redundancy of the Emergency Feedwater system. FSAR Section 10.5.2 reviewed.



## **10CFR50.59 SAFETY EVALUATION**

Page \_2\_ of \_2\_

oc	ument No. MAR 96-04-12-01				
5.	Are the consequences of malfunction of equipment previously evaluated in the FSAR increased?  Yes No				
	ASV-204 becomes a redundant manually operated steam admission valve to EFP-2. The Emergency Feed-				
	water system remains fully redundant.				
	FSAR Section 10.5.2 reviewed.				
	Is the possibility for malfunction of equipment of a different type than any previously evaluated in the FSAR created?  Yes No				
	Removal of the automatic opening on EFIC actuation on ASV-204 actually decreases the possibilities of				
	malfunctions of this equipment of a different type than previously evaluated in the FSAR since it removes				
	two circuits that could fail from the plant. FSAR Section 10.5.3 reviewed.				
	Is the margin of safety, as defined in the basis for any Technical Specification, reduced?  Yes No				
	The margin of safety, as defined in the basis for Technical Specification 3.7.5, Emergency Feedwater System,				
	satisfied by one of the two trains remaining operational in the event of the defined accidents even with a				
	single failure. Removal of the automatic opening of ASV-204 does not change the capability of the EFW				
	System to meet that requirement. Technical Specification 3.7.5 and its Bases reviewed.				
	If the answer is "Yes" to any of the questions in Part II an unreviewed safety question (USQ) is involved. Contact the Manager, Nuclear Licensing per NEP 210, Exhibit 4.				
-					
"	10 1 1/2 kg 10 1/2 ch /c				
- Mt e	d Name of Property OATE 9/26/96 Printed Name of Approver				
	C.3 DOYEL D.A. SHOOK				
	CR3 005937				



## NUCLEAR ENGINEERING SAFETY IMPACT ASSESSMENT

	-04-12-01				
IT I -	Screening for Impact on Plant Operations.				
A.	Could this change potentially reduce the level of safety of Crystal River Unit 3?  Yes No  Justification: (Do not simply restate the question.)				
	This MAR improves the level of safety at CR3. Per the 10CFR50.59 Evaluation, it creates no increased				
	probability or possibility of accidents, or no increased consequences of those accidents. It improves				
	the Emergency Feedwater System response to a LOCA, LOOP and "B" Battery failure, by eliminating				
	reliance on EFP-2 when no flow controls or indication is present.				
-					
B. _	Could this change possibly lead to an event that impacts the safe operation of Crystal River Unit 3.7  Yes No  Justification: (Do not simply restate the question.)				
_	Examination of the events that the EFW system is required to mitigate, and the single failure analysis				
_	of the system with the new configuration, shows that this MAR will not impact the availability of the				
_	EFW system. Eliminating the capability of ASV-204 to automatically open on EFIC actuation also				
_	eliminates possible spurious failures.				
_					
_					
-					
her a	inswer is "Yes," PRC review is required.				
y	3. Doyce DATE 4/26/96 25 hook 4/26/96 DATE				
- ·	B. DOYEL D. A. SHOOK				

Attachment 10 Page 3 of 5

## 10.5.2 System Description

The Emergency Feedwater System is required to assure an adequate emergency supply to the OTSGs to remove reactor decay heat until suitable conditions are attained to start the Decay Heat Removal System. The EF System consists primarily of redundant feedwater pumps powered from diverse power sources and the Emergency Feedwater Initiation and Control System (EFIC) which are required to function during periods when main feedwater supply and/or the electrical supply to the vital main feedwater auxiliaries has been lost. The EFIC System, a four channel safety grade control system, activates EF System components upon (1) both main feedwater pumps are tripped and reactor power is greater than 20%, (2) low level in either steam generator, (3) low pressure in either steam generator, (4) all four reactor coolant pumps are tripped, (5) or HPI actuation on both A and B ESAS channels. The EFIC System also controls the atmospheric steam dump valves and isolates the affected OTSG in event of a high energy line break. Related EF flow and tank level instrument signals are processed through EFW Auxiliary Cabinets for operator information in the main control room and remote shutdown panel. The EF System pumps (EFP-1 and EFP-2) are supplied from either the Dedicated Emergency Feedwater Tank (preferred), Condensate Storage Tank or the condenser hotwell (both secondary sources), with the water boiled off by the steam generators during cooldown being vented to the atmosphere. To provide indication of proper system operation, alarms are provided indicating pump auto start, pump failure to auto start, and motor-driven pump discharge pressure low when its control switch is in the normal after start position. A detailed description of the EFIC System is discussed in Section 7.2.4.

Safety-grade power supplies and manual override of the EFIC system have been provided for valves that must operate to supply water to the steam generators (EFV-11, EFV-14, EFV-32, and EFV-33). The pumps tie into a common discharge header and the emergency feedwater enters the steam generators through emergency feedwater nozzles in the superheater region of the once through steam generators. The pump discharge pressure from either pump deliver the minimum emergency feedwater flow against a steam generator pressure existing during main steam safety valve operation. Thus, the EFW pumps can deliver the required flow under all reactor and steam generator transient conditions. Emergency feedwater flow is controlled by steam generator level and total flow via the EFIC System. Separate EFW flow transmitters (EF-23-FT through EF-26-FT) to each OTSG are Redundant measurement is provided by OTSG level instrumentation . Each pump is protected by flow recirculation lines back to the provided. Dedicated Emergency Feedwater (EFT-2) Tank. The motor-driven emergency feedwater pump (EFP-1) receives power from the 4160 volt Engineered Safeguards (ES) Bus 3A. The motor is tripped on an AC power failure at the bus. In the event of this condition, the motor-driven emergency feedwater pump will automatically start five seconds after ES bus is loaded onto the "A" train diesel generator. The turbine-driven emergency feedwater pump is independent of AC power and starts by opening the 125V DC motor operated steam admission valves (ASV-5 and ASV-204) when activated by the EFIC System.

Delete

(Rev. 18)

Attachment 10 Page 4 of 5

## 10.5.2.1 Motor-Driven Emergency Feedwater Pump

The Motor-Oriven Emergency Feedwater Pump (EFP-1) is powered from emergency diesel generator 3A when normal AC power is not available. It has a rated capacity of 750 gpm at 1300 psig with a design recirculation flowrate of 200 gpm with the pump discharge closed. Motor, gear cooling, and lube oil cooling are supplied from the Nuclear Services Closed Cycle Cooling System (SW). Manual controls (both locally and on the main control board) provide the operator with the capability of shutting down the pump if the extra feedwater capacity is not required.

## 10.5.2.2 Turbine-Driven Emergency Feedwater Pump

The Turbine-Driven Emergency Feedwater Pump (EFP-2) provides redundant 100% capacity to the EF System and automatically starts on the same initiating signals as the motor-driven emergency feedwater pump (EFP-1). It has a rated capacity of 750 gpm at 1300 psig with a design recirculation flowrate of 200 gpm with the pump discharge closed. Manual controls (both locally and on the main control board) provide the operator with the capability of shutting down the pump is the extra feedwater capacity is not required. Lube oil cooling is supplied by the pump discharge water.

### 10.5.2.3 Emergency Feedwater Pump Turbine Drive

The Turbine Drive (EFTB-1) provides rapid start-up for EFP-2. The steam supply for EFTB-1 is obtained from both OTSGs through six-inch lines containing normally-open DC motor operated stop-check valves (MSV-55 and MSV-56) and check valves (MSV-186 and MSV-187) with one exception. The check valves and motor operated valves provide redundant isolation capability to preclude blowing down the operable steam generator in the event of main steam line or main feedwater line break. The exception is the piping between MSV-55/MSV-56 and the EF pump turbine. A rupture in this piping would result in simultaneous blowdown of both steam generators and would cause the turbine driven EF pump to be inoperable. Baw Analysis 86-1176873-00 (FPC Calc M-89-0056) shows this event to be within the plant design basis. Downstream of check valves (MSV-186 and MSV-187) the lines join to form a common supply to the pump turbine. Upstream of the turbine are redundant, normally closed DC motor operated valves (ASV-5 and ASV-204), which are opens upon actuation from the EFIC System. A description of the controls for these valves is contained in Section 7.2.4.

Turbine exhaust is vented to the atmosphere.

MAR	96-04-12-01
101	10011

			_		1
Attachment	10	Page	5	of <u>5</u>	

Two relief valves (EFV-99 and EFV-100) are provided to protect the tank from overpressurization. The relief valve discharge is piped to the tank enclosure sump. Two vacuum breakers (EFV-97 and EFV-98) are provided to protect the tank from negative pressure due to EFW drawdown operations.

EFT-2 can also be aligned as a backup water source to the auxiliary feedwater pump (FWP-7), as discussed in Section 10.6.

## 10.5.3 Safety Evaluation

For information on the following items, refer to the indicated section:

- 1. Protection from the effects of pipe rupture Section 5.4.4.
- 2. Seismic analysis Section 5.1.2.
- 3. Flood design Section 2.4.2.
- 4. Tornado design Section 5.2.1.2.6.

The EF System is also single failure proof to isolate an affected OTSG for those loss of main feedwater events where such 'solation is required (e.g., steamline break inside Primary Containment). Use of turbine-driven and motor-driven pumps results in diverse sources of power to the system.

The preferred source and various secondary (or alternate) sources of emergency feedwater as listed in Table 10-2 provide a redundant quality source of water to back up the dedicated emergency feedwater tank. The minimum quantity of usable condensate maintained in the Seismic Category I Dedicated Emergency Feedwater Tank is 150,000 gallons. This amount is sufficient to remove nuclear decay heat for a period of 18 hours at HOT STANDE1 conditions, during which time the RCS metal and contained water would not be cooled except by ambient losses to the containment. If plant cooldown to 280°F is required, additional usable condensate (some of which is not seismically protected) is available at CR-3 and on the Crystal River site from fossil-fueled power generating stations as listed in Table 10-2 under "Other EFW Sources."

The EFW turbine-driven pump and turbine are a self-contained unit operating independently of secondary support systems. The bearings on the turbine and pump are lubricated by slinging oil from reservoirs near the bearings. Lube oil cooling is accomplished by heat transfer to the pumped fluid.

To ensure EFW flow in the event of a loss of all AC power, the turbine-driven pump train derives its motive power from the main steam lines through valves MSV-55 and MSV-56. Valves EFV-2 (locked closed), EFV-11, EFV-32, EFV-57, and EFV-58 and ASV-204 receive power from Battery 'A'. Valves EFV-1 (locked closed) (EFV-14, EFV-33, EFV-55, EFV-56, MSV-55, MSV-56, and ASV-5 receive power from Battery 'B'.

Delete

(Rev. 20)



## INSTALLATION INSTRUCTIONS/CONSIDERATIONS

Crystal River Unit 3

Sheet \_1\_ of \_2

AR HUMBER

96-04-12-01

## A. GENERAL INSTALLATION INSTRUCTIONS

1. Accounting Information

Charge all time and materials to NU9604120100.

2. Material

None.

Interfaces

None.

Precautions/Cautions

Perform all work in accordance with FPC Accident Prevention Manual and applicable procedures.

## B. SPECIFIC INSTALLATION INSTRUCTIONS

- Open DC power source at DPDP-8A, Fuse #15, and Fuse #17, to deenergize control circuit and motor. (ASV-204)
- In Relay Rack 3A, as shown on Interim drawing EC-210-624, disconnect and remove or spare in place internal wiring as shown in the following table: (ASV-204)

From To TB15-17 AR-5 TB15-18 AR-6 TB15-19 AR-3 TB15-20 AR-4

- In Relay Rack 3A, as shown on Interim drawing EC-210-624, disconnect and spare in place conductors 1, 2, 3, and 4 of field cable ASE37 from TB15-17, 20, 18, and 19 respectively. (ASV-204)
- In Terminal Box AS-9, as shown on Interim drawing EC-209-008, Sheet AS-06, disconnect and spare in place conductors 1, 2, 3, and 4 of field cable ASE-37 on TBA 12, 4, 6, and 3 respectively. (ASV-204)
- Field to install in AS-9, as shown on Interim drawing EC-209-008, Sheet AS-06, #14AWG EQ safety related SIS Switchboard wire, FMIS #01270197, between TBA terminals 3 and 4. (ASV-204)
- Reestablish power at DPDP-8A, Fuse #15 and Fuse #17.



# INSTALLATION INSTRUCTIONS/CONSIDERATIONS

Crystal River Unit 3

Sheet 2 of 2

MAA HUMBER

96-04-12-01

- 6.1 Field to wire mark conductor 4 of circuit ASE36 wire mark 11.
- Examination/Testing/ISI Instructions
  - A. Examination Requirements
    None.
  - B. Testing Requirements

Verify proper operation of ASV-204 from Main Control Board, PSA Section, and Local Control Station AS-9.

C. ISI Instructions

Operations to time the stroke of ASV-204, including remote position indication verification per SP-349B.



### **DESIGN DATA SHEET**

Crystal River Unit 3

Page 1 of 2

_			96-04-12-01
	YES	NO	APPLICABLE DESIGN INPUT RÉQUIREMENTS
			Performance requirements such as capacity, rating, system output.
		X	Codes, standards, and regulatory requirements including the applicable issue and/or addends.
		$\boxtimes$	Design conditions such as pressure, temperature, fluid chemistry, and voltage.
		X	Loads such as seismic, wind, thermal, and dynamic.
			The modification will add, delete or modify essential equipment.
		$\boxtimes$	Environmental conditions anticipated during storage, construction, and operation such as
			pressure, temperature, humidity, corrosiveness, site elevation, wind direction, nuclear radiation, electromagnetic radiation and duration of exposure including 10CFR50.49 applicability.
			Interface requirements including definition of the functional and physical interfaces involving structures, systems, and components.
		$\boxtimes$	Material requirements including such items as compatibility, electrical insulation properties,
			protective coating, corrosion resistance (including erosion-corrosion susceptibility), and the presence of asbestos or cobalt.
		$\boxtimes$	Mechanical requirements such as vibration, stress, shock, and reaction forces.
			Structural requirements covering such items as equipment foundations and pipe supports.
			Hydraulic requirements such as pump net positive suction heads (NPSH), allowable pressure drops, and allowable fluid velocities.
		$\boxtimes$	Chemistry requirements such as provisions for sampling and limitations on water chemistry.
			Electrical requirements such as source of power, voltage, raceway requirements, electrical insulation, and motor requirements.
			Layout and arrangement requirements, to include potential adverse affects of non-seismically qualified masonry walls.
			Operational requirements under various conditions such as plant startup, normal plant operation, plant shutdown, plant emergency operation, special or infrequent operation, and system abnormal or emergency operation.
			Instrumentation and control requirements including indicating instruments, controls, and alarms required for operation, testing, and maintenance. Other requirements such as the type of instrument, installed spares, range of measurement, and location of indication should also be included.  CR3 005944



### **DESIGN DATA SHEET**

Crystal River Unit 3

Page 2 of 2

		96-04-12-01
YES	NO	APPLICABLE DESIGN INPUT REQUIREMENTS
7. 🗆		Access and administrative control requirements for plant security.
8. 🖾		Redundancy, diversity, and separation requirements of structures, systems, and components.
9. 🗆		Failure effects requirements of structures, systems, and components, including a definition of those events and accidents (e.g., flooding) which they must be designed to withstand.
o. 🗆		Test requirements including in-plant tests and the conditions under which they will be performed.
1. 🗆		Accessibility, maintenance, repair, and inservice inspection requirements for the plant including the conditions under which these will be performed.
2. 🖾		The modification will be within the following ALARA ZONE(S): Check as applicable:
		Zone III - White Zone II - Green Zone I - Yellow
3. 🗆	X	Transportability requirements such as size and shipping weight, limitations, I.C.C. regulations.
i. 🗆	X	Fire protection or resistance requirements: (Check applicable letter(s))
		a. Changes or additions/deletion of fire detection/suppression systems or equipment.
		□ b. Changes or additions to the plant configuration that change the effectiveness of existing fire detection/suppression systems.
. 🗆		Handling, storage, and shipping requirements. Include equipment protection requirements for in- place storage or system lay-up as applicable.
. 🗆	X	Other requirements to prevent undue risk to the health and safety of the public.
. 🗆		Materials, processes, parts, and equipment suitable for application.
. 🗆		Safety requirements for preventing personnel injury including such items as control of dangerous and hazardous materials, such as asbestos, escape provisions from enclosures, grounding of electrical systems, and the identification of appropriate caution statements for installation, removal, or use of hazardous and/or dangerous material. In addition, consideration
. 🗆		must be included for the removal and disposition of radioactive waste.  Addition or relocation of safe shutdown equipment, systems, components, or circuits that require compliance with the separation criteria stated in 10CFR50, Appendix R.

### CHECKLIST FOR EQ DOCUMENT REVIEW

Crystal River Unit 3

Page 1 of 2 DOCUMENT NUMBER DOCUMENT TITLE COD 4/2/86 MAR96-04-12-01 ASV-204 Automatic Opening Removal IOTE TO REVIEWER: Review documents for additions, deletions or changes to any original qualification (NEP-222) nd changes to equipment or environmental parameters (normal or post accident). Does the equipment being installed or modified require environmental qualification per 10CFR50.497 TY Yes □ No If within the scope of 10CFR50.49, is the equipment: (Check NA if the enswer to question 1 is "No.") a safety related electric equipment 1E that is relied upon to remain functional during and following design basis evepts? P Yes ☐ No ☐ NA a nonsafety-related electric equipment whose failure under postulated environmental conditions could prevent satisfactory performance of equipment within the scope of 10CFR50.497 ☐ NA a post accident monitoring equipment (Reg. Guide 1.97, Cat I or II)? Yes O No If the document addressed one of the following, will it have an impact on equipment in the scope of 10CFR50.49: temperature, pressure, radiation or humidity at ANY time (normal, abnormal, DBE) during plant operation? ☐ Yes IP No chemical or building spray? ☐ Yes equipment location? (moving to a different location, nearer or farther from pipeline, nearer or farther from wall) ☐ Yes No. TA No ☐ Yes fire barrier, piping insulation shielding? □ NA DBE operating time change for equipment that is in or will result in the need to be added to the scope of 10CFR50.497 ☐ Yes ☐ NA loop accuracy change? ☐ Yes O NA Will any of the topics described in item 2 above force the requirements of 10CFR50.49 on electric equipment? entify which topics(s)) ☐ Yes DINO Is equipment being removed from the scope of 10CFR50.49 with justification provided? D No

R-96-04-12-01	Page 2	2 of
	entation on file to support MAR/FCN installation for 10CFR50.49 requirements?	
Yes No	□ NA	
no, identify the docum	ent which is required to support the installation change.	
		_
or all questions checked	"yes," does the MAR/FCN adequately address 10CFR50.49 requirements?	
	"yes," does the MAR/FCN adequately address 10CFR50.49 requirements?	
Ves □ No	D NA	
Yes 🗆 No	D NA	
Ves □ No	D NA	
Ves □ No	D NA	
Yes 🗆 No	EQ acceptability prior to	



## INTEROFFICE CORRESPONDENCE

Nuclear Engineering Design

NAIE

240-3383

SUBJECT: Crystal River Unit 3

FSAR Change for MAR 96-04-12-01 File: DXREF MAR 96-04-12-01

TO: B. Gutherman

DATE: April 26, 1996

NED96-0272

MAR 96-04-12-01 removes the automatic opening capability on an EFIC actuation from ASV-204. This capability is being removed due to concerns raised from Operations about the ability of EFP-2 to run without any flow controls or indication, and the fact that the original capability was installed before the Diesel Generators were upgraded, so that EGDG-1A is now capable of handling a fully loaded EFP-1 during a LOCA, LOOP and a "B" Battery failure. Attached are 4 pages out of the FSAR with reference to the automatic opening that need to be change to delete the reference. Also attached is a copy of the 10CFR50.59 Evaluation from the MAR and the Regulatory/Environmental Review Form.

C. B. Doyel

Sr. Nuclear I&C Engineer

D. A. Shook

Nuclear Engineering Supervisor

cc:

S. F. Ulm

Records Management

MAR 96-04-12-01

Attachment \_\_\_\_\_\_ Page \_\_\_\_ of \_5\_\_\_



## REGULATORY/ENVIRONMENTAL REVIEW Crystal River Unit 3

Page 1 of 3

MAR96-04-12-01

EF AUCLEAR OPERATIONS DEPARTMENT PROCEDURE: NOD-111

1. 10 CFR 50.54 Reviews

Does this modification or document revision reduce the commitment to, scope of, or effectiveness of what is described in any of the following plans/programs which are required by 10CFR50.54 or CR3 License conditions? If unable to determine, contact responsible person designated below.		
Quality Program Description (FSAR Section 1.7) Contact: Director, Quality Programs	☐ Yes	₽ No
Licensed Operator Requalification Program (FSAR Section 12.2.3.4 and Training Department Procedure 203 Contact: Manager, Nuclear Operation Training	Yes	₽'no
Physical Security Plan Contact: Nuclear Security Superintendent	☐ Yes	1 No
Safeguards Contingency Plan Contact: Nuclear Security Superintendent	☐ Yes	□No
Radiological Emergency Response Plan Contact: Manager, Site Nuclear Services	☐ Yes	PNº
Fire Protection Plan Contact: Manager, Site Nuclear Services	Yes	D'No
If any answers are "Yes"		27
<ol> <li>Contact appropriate responsible person identified above to perform on the evaluation and attach.</li> </ol>	Evaluation Complete	n BNA
b. Contact the Manager, Nuclear Licensing for NRC submitta	. Submitte	d PNA
c. NRC approval received prior to change and attach.	☐ Complete	- DNA
ch Spec Program Reviews		
Does this modification or document revision change what is described in any of the following programs/plans which are required by Tech Spec 5.6.27		
Offsite Dose Calculation Manual Contact: Manager, Nuclear Chemistry	☐ Yes	1 No
Primary Coolant Sources Outside Containment Program Contact: Manager, Nuclear Plant Technical Support	☐ Yes	DNO.
Component Cyclic or Transient Limit Program Contact: Supervisor, Operations and Engineering Support	☐ Yes	WNO
Post Accident Sampling Program Contact: Manager, Nuclear Chemistry	☐ Yes	ØN₀
Containment Tendon Surveillance Program Contact: Manager, Nuclear Plant Technical Support	☐ Yes	ØN₀



## REGULATORY/ENVIRONMENTAL REVIEW Crystal River Unit 3

Page 2 of 3

MAR96-04-12-01

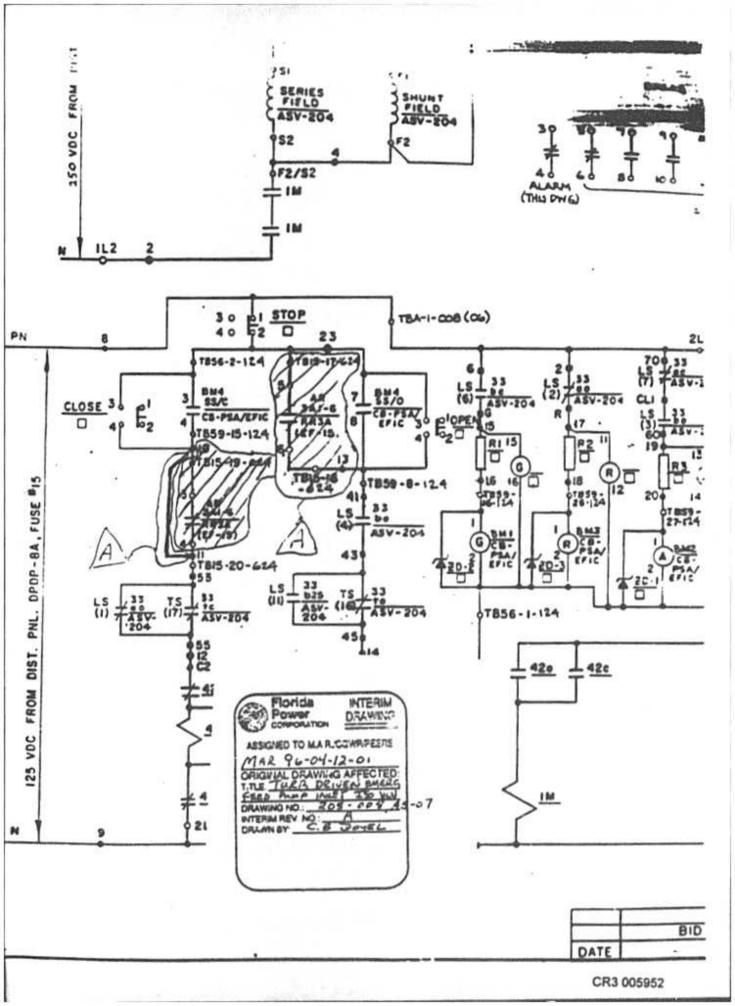
HEP A	UCLEAR	OPERATIONS DEPARTMENT PROCEDURE; HOG-11)			
		Inservice Inspection Program Contact: Manager, Nuclear Plant Technical Support	☐ Yes	DING	) i
		Inservice Testing Program Contact: Manager, Nuclear Plant Technical Support	☐ Yes	Ø No	13
		Secondary Water Chemistry Program Contact: Manager, Nuclear Chemistry	Yes	1 No	0)
		Ventilation Filter Testing Program Contact: Manager, Nuclear Plant Technical Support	☐ Yes	P/No	
		Explosive Gas & Storage Tank Radioactivity Monitoring Program Contact: Manager, Nuclear Chemistry	Yes	ØN₀	
		Diesel Fuel Oil Testing Program Contact: Manager, Nuclear Plant Technical Support	☐ Yes	Q/No	
		Core Operating Limits Report Contact: Manager, Safety Analysis & Fuel Management	Yes	ØN0	
		Reactor Coolant System/Pressure Temperature Limits Report Contact: Manager, Safety Analysis & Fuel Management	☐ Yes	PNº	
	H	any are "yes:"			
	a.	Contact appropriate responsible person identified above to perform the evaluation and attach.	Evaluation Complete		ØN/A
3.	Envi	ronmental Protection Plan Review	Complet	•	
	a.	Could this change affect the environment in a non-radiological way? That is, could this change affect:			
		<ol> <li>The environment in a non-radiological way?</li> <li>An increase in licensed power level?</li> <li>An increase in non-radiological effluents (Volume or chemicals - liquid or gas)?</li> <li>A change in Circulating or Raw Water flows?</li> <li>Dredging, filling or new construction on previously undisturbed areas?</li> </ol>	Yes Yu Yes Yes Yes Yes		
		If "yes," contact the Manager, Nuclear Licensing to perform evaluation and attach.	☐ Complete		W <sub>N/A</sub>
	b.	Does the modification affect the National Pollutant Discharge Elimination System permit or associated state permit?	☐ Yes	□w.	N/A
		If "yes," contact the Supervisor, Water Programs Section to evaluate reporting requirements. Notification of such action must also be made to the Manager, Nuclear Licensing.	Submitte	d	Ø'n/A
		EPA and/or FDER approval received, if needed, and attached.	☐ Yes	□No	
	If a	ny answer to 3a or 3b is "yes," a copy of the design document st be sent to the NGRC.			
	ls f	NGRC copy required?	Yes	PN.	

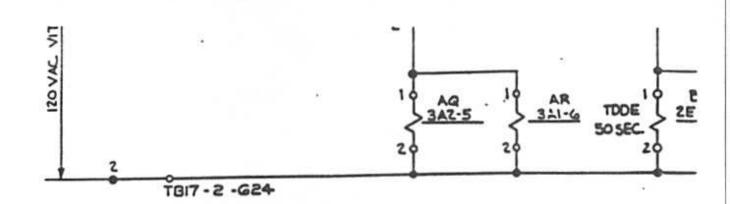
CR3 005950



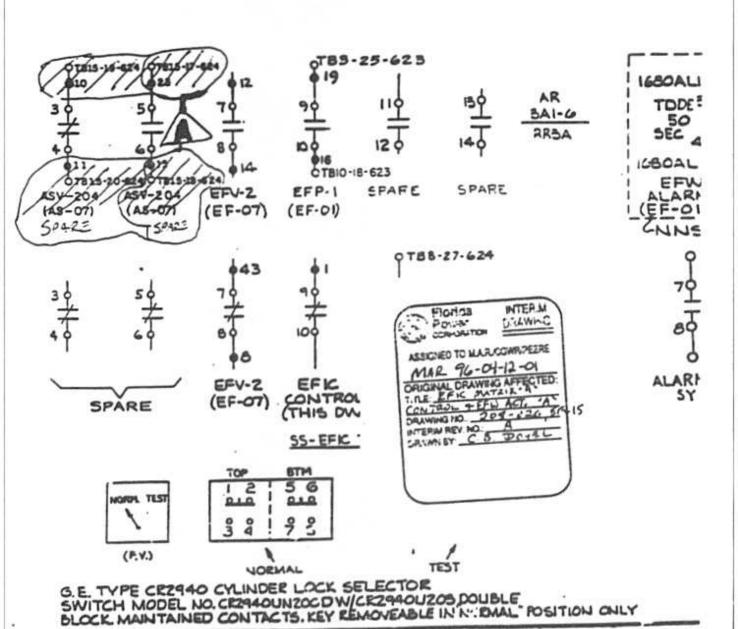
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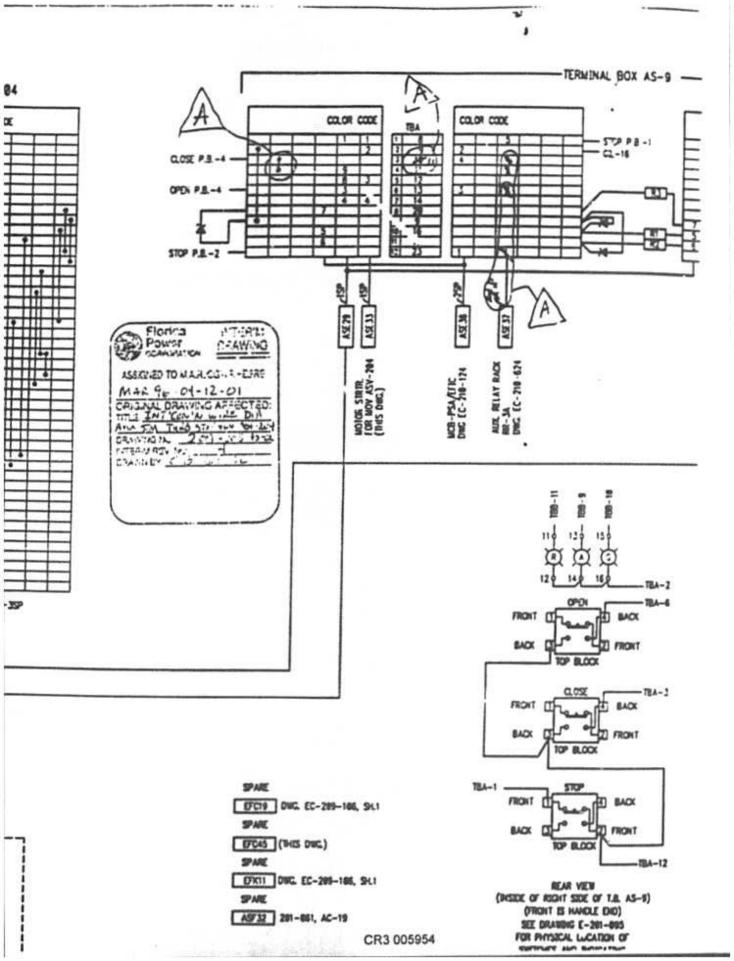
	Power Crystal River	Unit 3	age 3 of 3
	MBH NUMBER R96-04-12-01		
, Art	UCLEAR OPERATIONS DEPARTMENT PROCEDURE: NOO-11)		
4.	Review for change to Radioactive Waste System (10 CFR 50.34s and Appendix I)		
	Is this a change to a radioactive waste system (liquid, gaseous of solid) that could result in an increase of radioactive material released to the environment?	Yes No	□ N/A
	If "yes," submit change to Manager, Nuclear Licensing to evaluate the reporting requirements. This is for reporting evaluation only; the response is not part of the modification or document approve process for the change.	Submitted	☑ N/A
5.	Review for Implementation of Regulatory Guide 1.33 Activity  Does this document implement any activity in Appendix A of Regulatory Guide 1.33 (NOD-12) or any other procedures require by Technical Specification 5.6.1.17	od 🗆 Yes 🗆 No	□ N/A
	If "Yes," ensure review and approval cycle includes requirements of the Quality Programs Plan	□ Included	₪ <sub>N/A</sub>
o nad	IF ALL OF ABOVE ARE CHECKED NO, NO FURTHER REVIEWS A	hook 4/26/8/	
(	C. B DOYEL D.A.S	Hook	

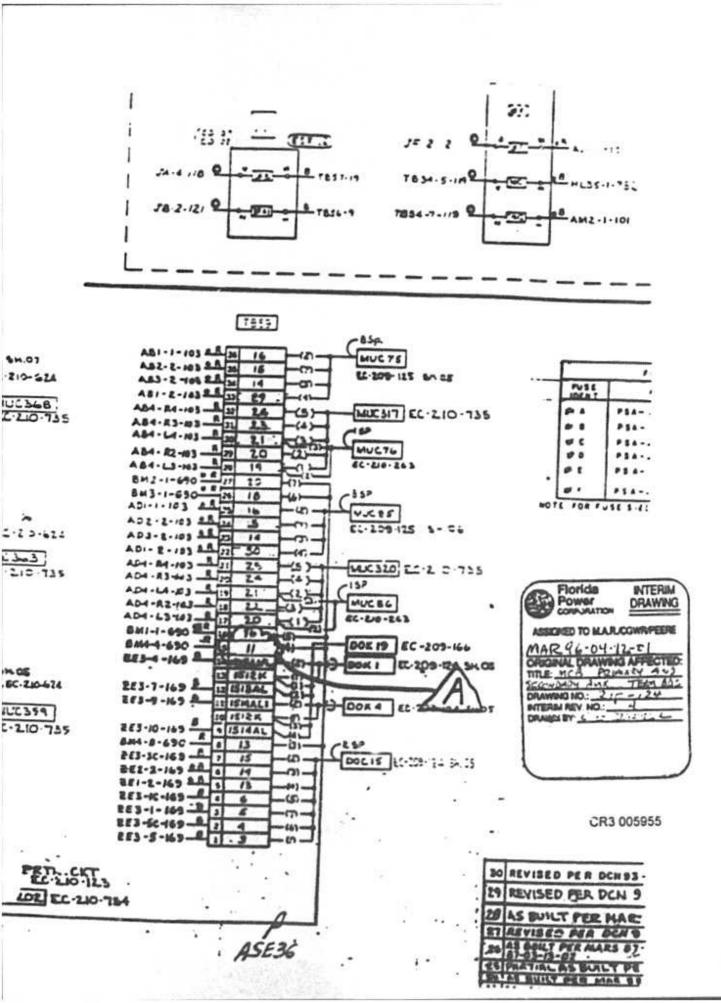


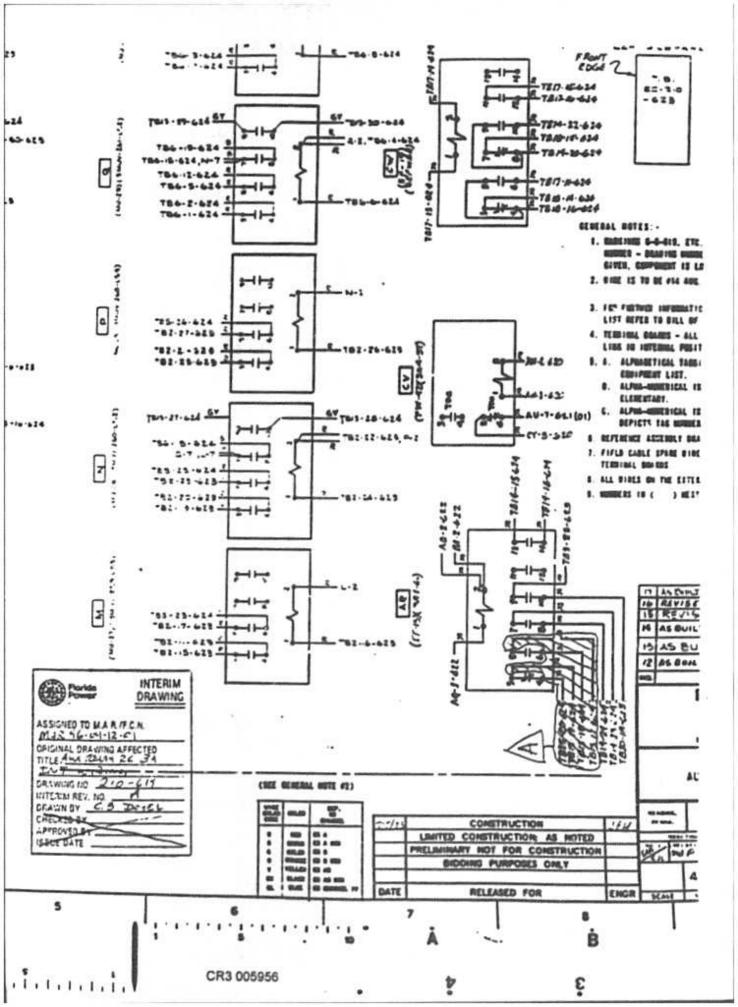


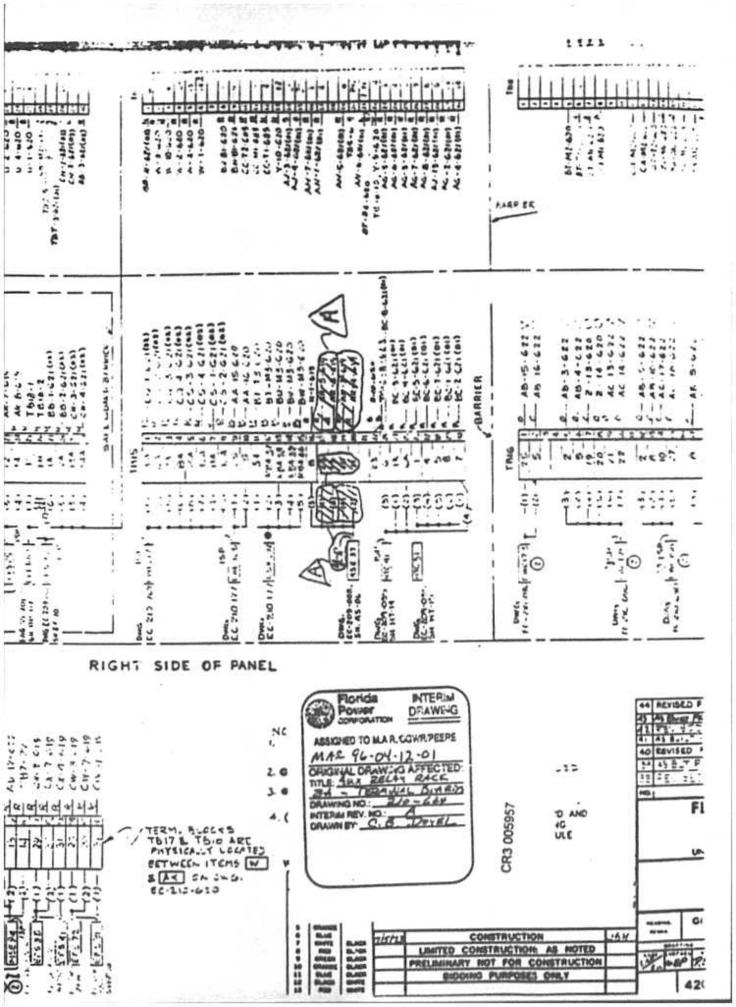
## EFW ACTUATION "A"

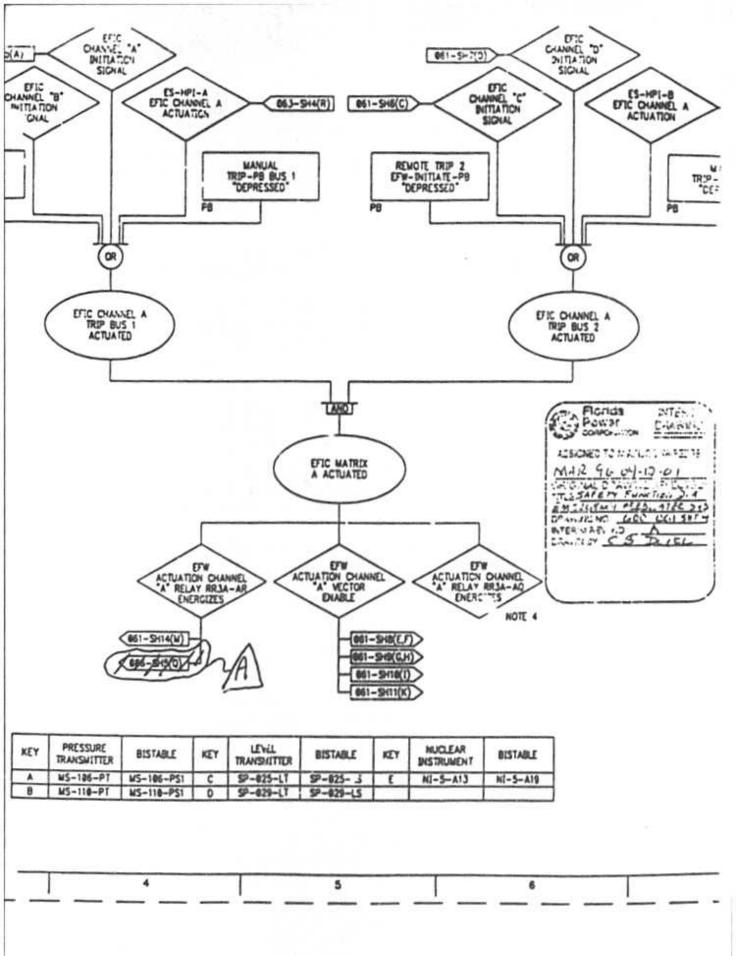












IS DETAIL IS T.PICAL OF THE VALVES IN TABLE I

**TEMPERATURE** 

ELEVENT

TB-326-TE!

MPERATURE

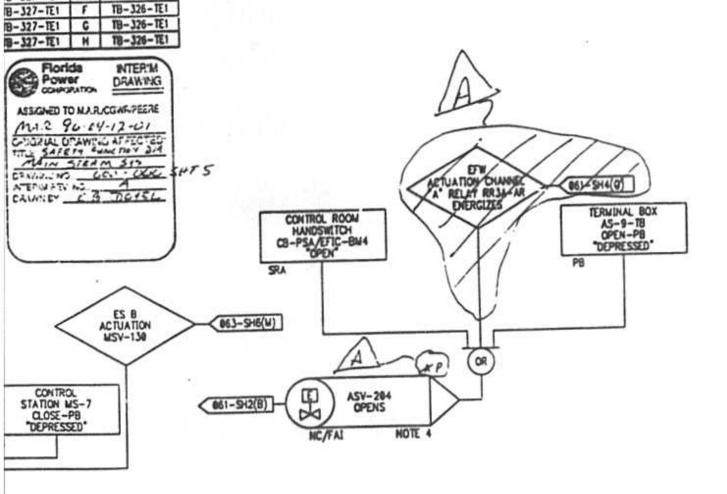
B-327-TE1

ELEMENT

KEY

Ε

- I VALVES THAT ARE NORWALLY IN THEIR SAFETY POSITION BUT WHICH RECEIVE A CONFIRMATORY ACTUATION SIGNAL ARE SHOWN AS ACTIVE, BUT ARE ASSUMED TO BE IN THEIR NORWAL POSITION FOR MODELING.
- 4. THESE VALVES ARE DEPICTED ON THE COMPOSITE FOR THE EMERGENCY FEEDWATER (EF) SYSTEM SFD AS THEY SUPPORT THE OPERATION OF THE EF PUMP TURBINE. HYMEVER, THEIR DETAILS ARE INCLUDED IN THIS STEAM SYSTEM DRAWING SERIES.



S B					
ED	62. AS BUILT PER MAR 37-18-89-81A	KLK	date	45	1611
	1. ISSUED PER DON-99-337	KRL	KRC	DAS	10/
	NO. REVISIONS	BY	CHECKED	I SHOVE	0 0/
PICAL OF THE VALVES IN TABLE 6.	ST. PETERSBURG. CRYSTAL BUCK	DARTOA		ION 855,000	KW
	SAFETY FUNCTION MAIN STEAM . DETAILS	DIA	GRAM		_
B-KS2 B-KS2	DRAWN BY:	==		DATE:	<u>-</u> -

			-	
Attachment.	4	Page	2	of <u>5</u>

Delete

The trip module located in the "A" cabinet starts the "A" train motor-driven EFW pump and the "B" train turbine-driven EFW pump. The trip module located in the "B" cabinet starts only the "B" train turbine-driven EFW pump. The starting of both EFW pumps on "A" train EFIC actuation is necessary to assure that the turbine driven pump will be operable in the event of a failure of the ES "B" 250/125V DC system coincident with loss of off-site power and a ES actuation. Under this scenario EFP-2 will be relied upon to share the emergency feedwater load with the motor driven emergency feedwater pump in order to decrease the electrical load on diesel generator EDG-3A. In order to cause a train of tFW to initiate, both Trip Bus I and Trip Bus 2 relays must be energized. For both trip bus relays to be energized, at least 2 channels of EFIC must issue initiate commands. Any 2 channels of EFIC issuing an "initiate" command will result in the actuation of at least one train of EFW. Since all four EFIC channels monitor the same parameters, initiate commands occur at the same time causing both EFW trains to start.

After EFW has been actuated, flow will be controlled by modulating the EFW control valves (EFV-55, EFV-56, EFV-57, and EFV-58) to maintain OTSG level at the appropriate setpoint. If the control valves hand/auto (H/A) stations are not in the Auto position, the EFW actuation causes them to be placed in Auto. The setpoint to be maintained is automatically determined by the control modules located in the "A" and "B" EFIC cabinets. The modules in the "A" cabinet controls flow from the "A" EFW train to the A and B OTSG and the modules in the "B" cabinet controls flow from the "C" EFW train to the A and B OTSG.

An occurrence of an EFW actuation with at least one RI purp running and one OTSG with an inventory level below 30 inches causes the EFW system to be on EFW flow control. The EFW flow control is to limit flow above 600 gom by biasing close the control valve(s) 50% and then applying an additional signal to proportionally close the valves to control flow until reaching the OTSG level control setpoint. At this control point, the OTSG level control positions the valve(s) and the flow control is reduced to zero when flow conditions are below 600 gcm. This same flow control scheme limits the arount of EFW flow to either one or both depressurized OTSG's resulting from a main steam line break or main feedwater line break. In both events, the control valve(s) will be partially closed and proportionally controlled up to 80% valve closure travel whenever the OTSG pressure is below 600 psig.

If EFW is actuated and at least 1 RC pump is running, the system will control OTSG level at approximately 30 inches. If no RC pumps are running, the control module will select the NATURAL CIRCULATION setpoint on the EFIC "High Range" I instrument. The control modules also have a ramp rate function that controls the rate of OTSG level increase between approximately 2 and 8 inches per minute. The parameter that determines the actual ramp rate is OTSG outlet pressure. When pressure is at the low end of the control band (about 800 psig), the lower ramp rate is selected.

(Rev. 18)



## INTEROFFICE CORRESPONDENCE

Nuclear Engineering Design

NAIE

240-3383 TELEPHONE

SUBJECT: Crystal River Unit 3

FSAR Change for MAR 96-04-12-01 File: DXREF MAR 96-04-12-01

TO: B. Gutherman

DATE: April 26, 1996

NED96-0272

MAR 96-04-12-01 removes the automatic opening capability on an EFIC actuation from ASV-204. This capability is being removed due to concerns raised from Operations about the ability of EFP-2 to run without any flow controls or indication, and the fact that the original capability was installed before the Diesel Generators were upgraded, so that EGDG-1A is now capable of handling a fully loaded EFP-1 during a LOCA, LOOP and a \*B\* Battery failure. Attached are 4 pages out of the FSAR with reference to the automatic opening that need to be change to delete the reference. Also attached is a copy of the 10CFR50.59 Evaluation from the MAR and the Regulatory/Environmental Review Form.

C. B. Doyel

Sr. Nuclear I&C Engineer

D. A. Shook

Nuclear Engineering Supervisor

cc:

S. F. Ulm

Records Management

The trip module located in the "A" cabinet starts the "A" train motor-driven EFW pump and the "B" train turbine-driven EFW pump. The trip module located in the "B" cabinet starts only the "B" train turbine-driven EFW pump. The starting of both EFW pumps on "A" train EFIC actuation is necessary to assure that the turbine driven pump will be operable in the event of a failure of the ES "B" 250/125V DC system coincident with loss of off-site power and a ES actuation. Under this scenario EFP-2 will be relied upon to share the emergency feedwater load with the motor driven emergency feedwater pump in order to decrease the electrical load on diesel generator EDG-3A. In order to cause a train of EFW to initiate, both Trip Bus 1 and Trip Bus 2 relays must be energized. For both trip bus relays to be energized, at least 2 channels of EFIC must issue initiate commands. Any 2 channels of EFIC issuing an "initiate" command will result in the actuation of at least one train of EFW. Since all four EFIC channels monitor the same parameters, initiate commands occur at the same time causing both EFW trains to start.

After EFW has been actuated, flow will be controlled by modulating the EFW control valves (EFV-55, EFV-56, EFV-57, and EFV-58) to maintain OTSG level at the appropriate setpoint. If the control valves hand/auto (H/A) stations are not in the Auto position, the EFW actuation causes them to be placed in Auto. The setpoint to be maintained is automatically determined by the control modules located in the "A" and "B" EFIC cabinets. The modules in the "A" cabinet controls flow from the "A" EFW train to the A and B OTSG and the modules in the "B" cabinet controls flow from the "B" EFW train to the A and B OTSG.

An occurrence of an EFW actuation with at least one RC pump running and one OTSG with an inventory level below 30 inches causes the EFW system to be on EFW flow control. The EFW flow control is to limit flow above 500 gam by diasing close the control valve(s) 50% and then applying an additional signal to proportionally close the valves to control flow until reaching the OTSG level control setpoint. At this control point, the OTSG level control positions the valve(s) and the flow control is reduced to zero when flow conditions are below 510 gam. This same flow control scheme limits the amount of EFW flow 10 tither the or that depressurized OTSG's resulting from a main steam line break or main feedwater line break. In both events, the control valve(s) will be partially closed and proportionally controlled up to 80% valve closure travel whenever the OTSG pressure is below 600 psig.

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(Rev. 18)

Delete

#### 10.5.2 System Description

The Emergency Feedwater System is required to assure an adequate emergency supply to the OTSGs to remove reactor decay heat until suitable conditions are attained to start the Decay Heat Removal System. The EF System consists primarily of redundant feedwater pumps powered from diverse power sources and the Emergency Feedwater Initiation and Control System (EFIC) which are required to function during periods when main feedwater supply and/or the electrical supply to the vital main feedwater auxiliaries has been lost. The EFIC System, a four channel safety grade control system, activates EF System components upon (1) both main feedwater pumps are tripped and reactor power is greater than 20%, (2) low level in either steam generator, (3) low pressure in either steam generator, (4, all four reactor coolant pumps are tripped, (5) or HPI actuation on both A and B ESAS channels. The EFIC System also controls the atmospheric steam dump valves and isolates the affected OTSG in event of a high energy line break. Related EF flow and tank level instrument signals are processed through EFW Auxiliary Cabinets for operator information in the main control room and remote shutdown panel. The EF System pumps (EFP-1 and EFP-2) are supplied from either the Dedicated Emergency Feedwater Tank (preferred), Condensate Storage Tank or the condenser hotwell (both secondary sources), with the water boiled off by the steam generators during cooldown being vented to the atmosphere. To provide indication of proper system operation, alarms are provided indicating pump auto start, pump failure to auto start, and motor-driven pump discharge pressure low when its control switch is in the normal after start position. A detailed description of the EFIC System is discussed in Section 7.2.4.

Safety-grade power supplies and manual override of the EFIC system have been provided for valves that must operate to supply water to the steam generators (EFV-11, EFV-14, EFV-32, and EFV-33). The pumps tie into a common discharge header and the emergency feedwater enters the steam generators through emergency feedwater nozzles in the superheater region of the once through steam generators. The pump discharge pressure from either pump deliver the minimum emergency feedwater flow against a steam generator pressure existing during main steam safety valve operation. Thus, the EFW pumps can deliver the required flow under all reactor and steam generator transient conditions. Emergency feedwater flow is controlled by steam generator level and total flow via the EFIC System. Separate EFW flow transmitters (EF-23-FT through EF-26-FT) to each OTSG are Redundant measurement is provided by OTSG level instrumentation Each pump is protected by flow recirculation lines back to the transmitters. Dedicated Emergency Feedwater (EFT-2) Tank. The motor-driven emergency feedwater pump (EFP-1) receives power from the 4160 volt Engineered Safeguards (ES) Bus 3A. The motor is tripped on an AC power failure at the bus. In the event of this condition, the motor-driven emergency feedwater pump will automatically start five seconds after ES bus is loaded onto the "A" train diesel generator. The turbine-driven emergency feedwater pump is independent of AC power and starts by opening the 125V DC motor operated steam admission valves (ASV-5 and ASV-204) when activated by the EFIC System.

Delete

#### 10.5.2.1 Motor-Driven Emergency Feedwater Pump

The Motor-Driven Emergency Feedwater Pump (EFP-1) is powered from emergency diesel generator 3A when normal AC power is not available. It has a rated capacity of 750 gpm at 1300 psig with a design recirculation flowrate of 200 gpm with the pump discharge closed. Motor, gear cooling, and lube oil cooling are supplied from the Nuclear Services Closed Cycle Cooling System (SW). Manual controls (both locally and on the main control board) provide the operator with the capability of shutting down the pump if the extra feedwater capacity is not required.

#### 10.5.2.2 Turbine-Driven Emergency Feedwater Pump

The Turbine-Driven Emergency Feedwater Pump (EFP-2) provides redundant 100% capacity to the EF System and automatically starts on the same initiating signals as the motor-driven emergency feedwater pump (EFP-1). It has a rated capacity of 750 gpm at 1300 psig with a design recirculation flowrate of 200 gpm with the pump discharge closed. Manual controls (both locally and on the main control board) provide the operator with the capability of shutting down the pump is the extra feedwater capacity is not required. Lube oil cooling is supplied by the pump discharge water.

#### 10.5.2.3 Emergency Feedwater Pump Turbine Drive

The Turbine Drive (EFTB-1) provides rapid start-up for EFP-2. The steam supply for EFTB-1 is obtained from both OTSGs through six-inch lines containing normally-open DC motor operated stop-check valves (MSV-55 and MSV-56) and check valves (MSV-186 and MSV-187) with one exception. The check valves and motor operated valves provide redundant isolation capability to preclude blowing down the operable steam generator in the event of main steam line or main feedwater line break. The exception is the piping between MSV-55/MSV-56 and the EF pump turbine. A rupture in this piping would result in simultaneous blowdown of both steam generators and would cause the turbine driven EF pump to be inoperable. Baw Analysis 86-1176873-00 (FPC Calc M-89-0056) snows this event to be within the plant design basis. Downstream of check valves (MSV-186 and MSV-187) the lines join to form a common supply to the pump turbine. Upstream of the turbine are redundant, normally closed DC motor operated valves (ASV-5 and ASV-204), which are opens upon actuation from the EFIC System. A description of the controls for these valves is contained in Section 7.2.4.

Turbine exhaust is vented to the atmosphere.

Two relief valves (EFV-99 and EFV-100) are provided to protect the tank from overpressurization. The relief valve discharge is piped to the tank enclosure sump. Two vacuum breakers (EFV-97 and EFV-98) are provided to protect the tank from negative pressure due to EFW drawdown operations.

EFT-2 can also be aligned as a backup water source to the auxiliary feedwater pump (FWP-7), as discussed in Section 10.6.

#### 10.5.3 Safety Evaluation

For information on the following items, refer to the indicated section:

- Protection from the effects of pipe rupture Section 5.4.4.
- 2. Seismic analysis Section 5.1.2.
- Flood design Section 2.4.2.
- Tornado design Section 5.2.1.2.6.

The EF System is also single failure proof to isolate an affected OTSG for those loss of main feedwater events where such isolation is required (e.g., steamline break inside Primary Containment). Use of turbine-driven and motor-driven pumps results in diverse sources of power to the system.

The preferred source and various secondary (or alternate) sources of emergency feedwater as listed in Table 10-2 provide a redundant quality source of water to back up the dedicated emergency feedwater tank. The minimum quantity of usable condensate maintained in the Seismic Category I Dedicated Emergency Feedwater Tank is 150,000 gallons. This amount is sufficient to remove nuclear decay heat for a period of 18 hours at HOT STANCE: conditions, during which time the RCS metal and contained water would not be cooled except by ambient losses to the containment. If plant cooldown to 230°F is required, additional usable condensate (some of which is not seismically protected) is available at CR-3 and on the Crystal River site from fossil-fueled power generating stations as listed in Table 10-2 under "Other EFW Sources."

The EFW turbine-driven pump and turbine are a self-contained unit operating independently of secondary support systems. The bearings on the turbine and pump are lubricated by slinging oil from reservoirs near the bearings. Lube oil cooling is accomplished by heat transfer to the pumped fluid.

To ensure EFW flow in the event of a loss of all AC power, the turbine-driven pump train derives its motive power from the main steam lines through valves MSV-55 and MSV-56. Valves EFV-2 (locked closed), EFV-11, EFV-32, EFV-57, and EFV-58 and ASV-204 receive power from Battery 'A'. Valves EFV-1 (locked closed) (EFV-14, EFV-33, EFV-55, EFV-56, MSV-55, MSV-56, and ASV-5 receive power from Battery 'B'.

Delete

(Rev. 20)



## 10CFR50.59 SAFETY EVALUATION | Comments

Page Z of 2

N - 10CFR50 59 Evaluation Review NEP 210, Exhibit 4, instructions before completing Part II. All "Yes" and "No" answers must be explained.
Is the probability of occurrence of an accident previously evaluated in the FSAR increased?  Yes No
Eliminating the automatic opening upon an EFIC actuation of ASV-204 will not impact the probability of
occurrence of any of the accidents analyzed in Chapter 14 of the FSAR. Those accidents involve the
failure of large plant components and none of them are started by failure of the control circuitry for
ASV-204. FSAR Chapter 14 reviewed.
Are the consequences of an accident previously evaluated in the FSAR increased?  Yes No
The accidents that the opening of ASV-204 is involved in are any that involve an EFIC initiation. Since they
all take a concurrent LOOP, this involves every one of them. The only single failure that may require ASV-
204 to automatically open is a failure of ASV-5 to automatically open. Any single failure that causes ASV-5 to
not open precludes a single failure that would effect the "A" Emergency Feedwater Train. Since the "A" EFW
train would be available to mitigate the consequences of any postulated accident, the consequences of that accident would not be increased. FSAR Chapter 14 reviewed.
Is the possibility of an accident of a different type than any previously evaluated in the FSAR created?  Yes No
Since this MAR takes out the capability of ASV-204 to open automatically, it actually decreases the possibil-
ity of an accident of a different type than any previously evaluated in the FSAR, as ASV-204 cannot
spuriously open as a result of a failure in that circuit. FSAR Section 10.5.2 reviewed.
Is the probability of occurrence or malfunction of equipment previously evaluated in the FSAR increased?  Yes No
ASV-204 becomes a redundant manually operated steam admission valve to EFP-2. This does not impact the
redundancy of the Emergency Feedwater system. FSAR Section 10.5.2 reviewed.



## 10CFR50.59 SAFETY EVALUATION

Page 2 of 2

	Are the consequences of malfunction of equipment previously evaluated in the FSAR increased?  Yes No				
	ASV-204 becomes a redundant manually operated steam admission valve to EFP-2. The Emergency Feed-				
	water system remains fully redundant.				
	FSAR Section 10.5.2 reviewed.				
	Is the possibility for malfunction of equipment of a different type than any previously evaluated in the FSAR created?  Yes No				
	Removal of the automatic opening on EFIC actuation on ASV-204 actually decreases the possibilities of				
	malfunctions of this equipment of a different type than previously evaluated in the FSAR since it removes				
	two circuits that could fail from the plant. FSAR Section 10.5.3 reviewed.				
	Is the margin of safety, as defined in the basis for any Technical Specification, reduced?  Yes No				
	The margin of safety, as defined in the basis for Technical Specification 3.7.5, Emergency Feedwater System				
	is satisfied by one of the two trains remaining operational in the event of the defined accidents even with a				
	single failure. Removal of the automatic opening of ASV-204 does not change the capability of the EFW				
	System to meet that requirement. Technical Specification 3.7.5 and its Bases reviewed.				
	System to meet that requirement. Technical openication 5.775 this is				
_	If the answer is "Yes" to any of the questions in Part II an unreviewed safety question (USQ) is involved.  Contact the Manager, Nuclear Licensing per NEP 210, Exhibit 4.				
	If the answer is "Yes" to any of the questions in Part II an unreviewed safety question (USQ) is involved.  Contact the Manager, Nuclear Licensing per NEP 210, Exhibit 4.				
_	If the answer is "Yes" to any of the questions in Part II an unreviewed safety question (USQ) is involved.  Contact the Manager, Nuclear Licensing per NEP 210, Exhibit 4.				



## NUCLEAR ENGINEERING SAFETY IMPACT ASSESSMENT

	3-04-12-01
PARTI	- Screening for Impact on Plant Operations.
Α.	Could this change potentially reduce the level of safety of Crystal River Unit 3?  Yes No  Justification: (Do not simply restate the question.)
	This MAR improves the level of safety at CR3. Per the 10CFR50.59 Evaluation, it creates no increased
	probability or possibility of accidents, or no increased consequences of those accidents. It improves
	the Emergency Feedwater System response to a LOCA, LOOP and "B" Battery failure, by eliminating
	reliance on EFP-2 when no flow controls or indication is present.
В	Could this change possibly lead to an event that impacts the safe operation of Crystal River Unit 3.?  Yes No  Justification: (Do not simply restate the question.)
	Examination of the events that the EFW system is required to mitigate, and the single failure analysis
	of the system with the new configuration, shows that this MAR will not impact the availability of the
	EFW system. Eliminating the capability of ASV-204 to automatically open on EFIC actuation also
	eliminates possible spurious failures.
If either	r answer is "Yes," PRC review is required.
	3 Douch our 4/26/96 DOS hook 4/26/96 0001
Protest to	Printed Name of Approve

#### MAR FUNCTIONAL TEST PROCEDURE FOR

#### ASV-204 EFIC AUTO REMOVAL

MAR: 96-04-12-01

TP# 1, REV.0

ORIGINAL

1.0	PI	ID	PO	SE
1.0	г.	m	ru	36

1.1	TEST	INTENT
	T See and T	#1 7 E But 1 2 E

- 1.1.1 MAR deletes EFIC-A Actuation contacts from open & close legs of ASV-204 control circuit.
- 1.1.2 The test will simulate an output for EFIC Actuation A, to verify that
  - ASV-204 does not receive an input, and
  - all other functions associated with the actuation signal continue to operate satisfactorily.

#### 1.2 TEST SCOPE

- 1.2.1 This test will effect:
  - relay 3A1-6 (item AR) and relay 3A2-5 (item AQ) in RR3A
  - control circuits for ASV-204, EFV-2, and EFP-1

#### 1.3 TEST DESCRIPTION

- 1.3.1 ASV-204, EFV-2, and EFP-1 will be disabled to prevent their operation during the test.
- 1.3.2 Control circuits for ASV-204, EFV-2, and EFP-1 will be configured to permit the desired testing to proceed (interlocks, standing trips, etc will be disabled as necessary).
- 1.3.3 A jumper will be installed in RR3A to simulate an EFIC-A actuation.

#### 2.0 ACCEPTANCE CRITERIA

- 2.1 Simulation of an EFIC-A actuation signal will energize relay 3A1-6 (item AR) and relay 3A2-5 (item AQ) in RR3A and;
- 2.1.1 Will NOT energize ASV-204 OPEN contactor.
- 2.1.2 Will NOT prevent energizing ASV-204 CLOSE contactor.
- 2.1.3 Will ENERGIZE EFV-2 OPEN contactor.
- 2.1.4 Close breaker for EFP-1.

CR3 005970

3.0	REFERENCES
3.1	IMPLEMENTING REFERENCES
3.1.1	None
3.2	DEVELOPMENTAL REFERENCES
3.2.1	CP-134, Preparation, Approval and Performance of MAR Functional Test Procedures.
3.2.3	MAR
4.0	SPECIAL TEST EQUIPMENT
4.1	None
5.0	LIMITS AND PRECAUTIONS
5.1	Close coordination with Operations Department will be required while performing this test.
5.2	If any leads are lifted, terminal block links opened or jumpers installed, then equipment alteration and restoration must be documented on Equipment Alteration Log (Attachment III) unless otherwise recorded in Section 7.0 of this procedure.
5.3	If a step or subsection fails to meet the established criteria, then testing may continue to the next step or subsection if the Test Engineer determines that subsequent testing will not be affected by the failed step or subsection.
5.4	In the event of any unanticipated or unusual occurrence, stop testing and restore inoperative systems if possible, and notify the NSSOD/ANSSOD.
5.5	The scope of this procedure includes EQ components, but the test does not impact their EQ characteristics

6.0	PREREQUISITE CONDITIONS
6.1	Mar installation is complete
6.2	Section 5.0 (Limits and Precautions) have been read and understood.
6.3	Obtain a Tagging Order, or if the NSSOD will not permit the use of tags, ensure that the following equipment is aligned as required.  [] Blue tag DPDP-8A sw#15 is ON - Control power for ASV-204  [] Red tag DPDP-8A sw#17 is OFF - Motor power for ASV-204  [] Blue tag DPDP-8A sw#2 is ON - Control power for EFV-2  [] Red tag DPDP-8A sw#1 is OFF - Motor power for EFV-2  [] Blue tag 4KV ES Bus unit 3A3 racked to TEST - EFP-1 motor  [] Blue tag EFV-2 CB-PSA control switch  [] Blue tag EFV-2 Local control switch  [] Blue tag ASV-204 CB-PSA control switch  [] Blue tag ASV-204 CB-PSA control switch  [] Blue tag EFIC Test-A select switch in RR3A
6.4	Ensure that the 4KV A-ES Bus is energized via Bkr 3205, 3207, or 3211.
6.5	A pretest briefing has been conducted with all test personnel.
6.6	The NSSOD/ANSS has given his app wal to begin the test.
6.7	Obtain a key for the EFIC Test-A selector switch (in RR3A). / Initl. Date

7.0	TEST INSTRUCTIONS	
7.1	Configure EFP-1 control circuit for testing.	
7.1.1	Ensure 4KV A-ES bus unit 3A3 is in the TEST position.	
		Initl. Date
7.1.2	If both EFV-2 and EFV-3 are closed, perform the next two If either EFV-2 or EFV-3 are open, skip the next two steps;	
7.1.2.1	Eliminate the "EFV-2 and 3 closed" trip by opening link AJ1 in 4KV ES unit 3A3.	Initl. Date
7.1.2.2	At 4KV A-ES unit 3A3, satisfy the "EFV-2 or 3 open" permissions a jumper from AJ1 to AJ5.	Initl. Date
7.1.3	Direct the control room ope. stor to close EFP-1 breaker by placing its control switch in START.	y mom∟:tarily
	Verify that EFP-1 breaker is closed.	Initl. Date
7.1.3.1	Direct the control room operator to open EFP-1 breaker by placing its control switch in STOP.	momentarily
	Verify that EFP-1 breaker is open.	Initl. Date
7.2	Configure ASV-204 and EFV-2 control circuits for testing.	
7.2.1	At DPDP-8A;	
	[ ] Ensure that switch 1 is OPEN,	
	[ ] Ensure that switch 17 is OPEN.	Initl. Date
7.2.2	In RR2, disable the vacuum breaker closed interlock with E the link at TB13-30.	FV-2, by opening
		Initl. Date

7.2.3	In terminal box EF-2; bypass EFV-2 open and close limits as follows;	
	[] install a jumper from TBA-6 to TBB-6	
	[ ] install a jumper from TBA-6 to TBC-1	Initl. Date
7.2.3.1	In the motor starter panel for EFV-2, verify that	
	[ ] Close contactor is de-energized.	
	[ ] Open contactor is de-energized.	,
		Initl. Date
7.2.3.2	At control station EF-2; momentarily depress the close p	ush button.
		Initl. Date
7.2.3.3	In the motor starter panel for EFV-2, verify that the	
	[ ] Close contactor is ENERGIZED.	
	[ ] Open contactor is de-energized	Initl. Date
7.2.3.4	At control station EF-2; momentarily depress the stop pu	Initl. Date
7.2.3.5	In the motor starter panel for EFV-2, verify that the	
	[ ] Close contactor is de-energized	
	[ ] Open contactor is de-energized.	Initl. Date
7.2.3.6	At control station EF-2; momentarily depress the open po	ush button.
		CR3 005974

7.2.3.7	In the motor starter panel for EFV-2, verify that the	
	[ ] Close contactor is de-energized.	
	[ ] Open contactor is ENERGIZED.	Initl. Date
7.2.3.8	At control station EF-2; momentarily depress the stop pu	Initl. Date
7.2.3.9	In the motor starter panel for EFV-2, verify that the	
	[ ] Close contactor is de-energized	
	[ ] Open contactor is de-energized.	Initl. Date
7.2.4	In terminal box AS-9; bypass ASV-204 open and close limits as follows;	
	[] install a jumper from TBA-4 to TBA-5	
	[ ] inatall a jumper from TBA-6 to TBA-7	Initl. Date
7.2.4.1	In the motor starter panel for ASV-204, verify that	
	[ ] Close contactor is de-energized.	
	[ ] Open contactor is de-energized.	Initl. Date
7.2.4.2	At terminal box AS-9 (on the right side punel); depress a push button.	nd HOLD the close
		Initl. Date
7.2.4.3	In the motor starter panel for ASV-204, verify that the	
	[ ] Close contactor is ENERGIZED.	
	[ ] Open contactor is de-energized	Initl Date

7.2.4.4	At terminal box AS-9; release the close pushbutton.	,
		Initl. Date
7.2.4.5	In the motor starter panel for ASV-204, verify that the	
	[ ] Close contactor is de-energized	
	[ ] Open contactor is de-energized.	Initl. Date
7.2.4.6	At terminal box AS-9; depress and HOLD the open push b	Initl. Date
7.2.4.7	In the motor starter panel for ASV-204, verify that the	
	[ ] Close contactor is de-energized.	
	[ ] Open contactor is ENERGIZED.	Initl. Date
7.2.4.8	At terminal box AS-9; release the open pushbutton.	Initl. Date
7.2.4.9	In the motor starter panel for ASV-204, verify that the	
	[ ] Close contactor is de-energized	
	[ ] Open contactor is de-energized.	Initl. Date
7.3	In RR3A, place EFIC Test-A selector switch (item G) in the 1	EST position.
7.3.1	In RR3A, install a jumper from Selector switch (item G) term (wire on terninal 1 is labeled CU-6) to TB17-1 (210-624).	ninal 1

CR3 005976

7.3.1.1	Inform the control room operator that performance of the EFP Start Failure alarms.	nis test will initiate
		Initl. Date
• 7.3.2	In RR3A, place EFIC Test-A selector switch (item G) in N Verify that - [] relay 3A1-6 (item AR) is ENERGIZED, [] relay 3A2-5 (item AQ) is ENERGIZED.	IORMAL position.
• 7.3.3	Verify that the breaker for EFP-1 has CLOSED.	
		Initl. Date
• 7.3.4	In the motor starter panel for EFV-2, verify that the	
	[ ] Close contactor is de-energized.	
	[ ] Open contactor is ENERGIZED.	Initl. Date
• 7.3.5	In the motor starter panel for ASV-204, verify that	
	[ ] Close contactor is DE-ENERGIZED.	
	[ ] Open contactor is DE-ENERGIZED.	/_ Initl. Date
7.3.6	At terminal box AS-9; depress and HOLD the close push	button. Initl. Date
7.3.6.1	In the motor starter panel for ASV-204, verify that the	
	[ ] Close contactor is ENERGIZED.	
	[ ] Open contactor is de-energized	Initl. Date
7.3.6.2	At terminal box AS-9; release the close pushbutton.	Initl. Date

7.3.6.3	In the motor starter panel for ASV-204, verify that the	
	[ ] Close contactor is de-energized	
	[ ] Open contactor is de-energized.	Initl. Date
7.3.6.4	At terminal box AS-9; depress and HOLD the open push but	Initl. Date
• 7.3.6.5	In the motor starter panel for ASV-204, verify that the	
	[ ] Close contactor is de-energized.	
	[ ] Open contactor is ENERGIZED.	Initl. Date
7.3.6.6	At terminal box AS-9; release the open pushbutton.	Initl. Date
7.3.6.7	In the motor starter panel for ASV-204, verify that the	
	[ ] Close contactor is de-energized	
	[ ] Open contactor is de-energized.	Initl. Date
7.4	In terminal box EF-2;	
	[ ] Remove jumper from TBA-6 to TBB-6 Independent Verification	Initl. Date
	[ ] Remove jumper from TBA-6 to TBC-1 Independent Verification	Initl. Date
7.5	In terminal box AS-9;	
	[ ] Remove jumper from TBA-4 to TBA-5 Independent Verification	Initl. Date

	[ ] Remove jumper from TBA-6 to TBA-7	
	Independent Verification	Initl. Date
7.6	At 4KV A-ES Bus, trip EFP-1 breaker.	Initl. Date
7.6.1	In 4KV ES unit 3A3, close link AJ11. If it was not opened NA this step. Independent Verification	Initl. Date
7.6.2	In 4KV ES unit 3A3, remove jumper from AJ1 to AJ5. If it was not installed, NA this step. Independent Verification	Initl. Date
7.7	In RR2, close link at TB13-30. Independent Verification	Initl. Date
7.8	in RR3A, place EFIC Test-A selector switch (item G) in th	ne TEST position.
7.8.1	In RR3A, remove jumper from Selector switch (item G) t	erminal 1 to TB17-1.
	Independent Verification	Initl. Date
7.8.2	In RR3A, place EFIC Test-A selector switch (item G) in Noverify that - [ ] relay 3A1-6 (item AR) is de-energized, [ ] relay 3A2-5 (item AQ) is de-energized.	ORMAL position.

CR3 005979

8.0	RESTORATION	
8.1	Ensure that all panels and terminal boxes are closed; [] Term Box AS-9 [] Term Box EF-2 [] ASV-204 motor starter panel [] EFV-2 motor starter panel	Initial Date
8.2	Notify NSSOD/ANSS that test is complete.	Initial Date
8.3	Release tags acquired for this test.	Initl. Date
9.0	ATTACHMENTS	
9.1	Attachment I - Test Log	
9.2	Attachment II - Test Results Review And Approval Form	
9.3	Attachment III - Equipment Alteration Log	
9.4	Attachment IV - Test Exception Report	
9.5	Attachment V - Test Exception Log	
9.6	Attachment VI - Infrequently Performed Test Or Evolution	Checklist

## TEST LOG

MAR	No.	96-04-12-01	TP No1	
		and the state of t		

DATE/TIME	TEST LOG ENTRY	

#### Attachment II

## TEST RESULTS REVIEW AND APPROVAL FORM

MAR No96	-04-12-01	TP No1
Is this a p	artial or full review of MAR	Test Procedure results?
PARTIAL _	FULL If a pa	rtial review, describe the of the test completed and the ng test requirements.
Has all esta	ablished acceptance criteria	been satisfied?
YES	NO If no, explain resolve the factiteria.	corrective actions taken to ilure to meet acceptance
Have all tes tested or ot N/A block.	t exceptions noted on the TES herwise satisfied? If no tes	ST EXCEPTION LOG been resolved and st exceptions were noted check the
YES _	NO N/A	If the answer is NO, then explain what corrective actions were taken to resolve open items.
Prepared by:	Test Director	Date:
	NSSOD/ANSSOD	Date:
	NSSOD/ANSSOD SNES Supv., Funct. Test	

WORK REQUEST NUMBER		RK REQUEST NUMBER PROCEDURE NUMBER		R TP-1 M			MAR NUMBER 96-04-12-			-04-12-01	
		DESCRIPTION	DM			ALTER	ATION	$\neg$		RESTO	RATION
ITEM	STATE OF A	LTERATION	EFFECTS	OF ALTERATION		ORMED	INDEP. V	ER.	PERFOR	MED	INDEP. VER.
	FROM	TO	UPON SYSTEM / EQUIPMENT		INIT	/DATE	DATE INIT/DATE		BY INIT/DATE		INIT/DATE
	-										
	-							$\dashv$			
								+			
								-			

NOTE: If an equipment alteration must remain in effect beyond the shift during which it was implemented and active maintenance activities will not continue in the next shift, THEN the Work Supervisor and the NSSOD must be notified that the equipment alteration will remain in place beyond the present shift.

NOTE: Prior to any equipment alteration being installed, the first three spaces under DESCRIPTION (ITEM, STATE

OF ALTERATION and EFFECTS OF ALTERATION) on the Equipment Alteration Log must be completed.

COMPLETED BY	Y	DATE	SUPERVISOR	CONCURRENCE		DATE	
--------------	---	------	------------	-------------	--	------	--

## TEST EXCEPTION REPORT

MAR 96-04-12-01	TP # 1	TER #	
Acceptance Criteria a	ffected: YES or N	O Procedure Step No.:	
DESCRIPTION OF EXCEPT	ION:		
Test Engineer _		Date	
IMMEDIATE ACTION TAKE	Y:		
Test Engineer _		Date	
PLANNED RESOLUTION:			
Supervisor, Functi	onal Test	Date	
REVIEW AND CLOSURE ACT	ION:		
Supervisor, Functional	Test	Date	

## TEST EXCEPTION LOG

	MAR # _96-04-12-01	TP #1	_	
TER No.	DESCRIPTION OF TEST EXCEPTION		DATE INITIATED	DATE
			-	
		9)		
			-	
				-
				_
		E		
SNES SUPERVIS	OR, FUNCTIONAL TEST	DATE		

MAR 96-04-12-01, TP-1, Rev.1

#### INFREQUENTLY PERFORMED TEST OR EVOLUTION CHECKLIST

Answer the following questions to determine if this procedure describes an infrequently performed test or evolution.

1.	Does this procedure core reactivity cor	create a situation that can affect the strol or the reactor protection systems?
	YES	NOX
		test relays associated with EFP-1, with  It affects neither core reactivity
	reactor protection o	
	If the and	swer is no, do not complete more of this checklist
2.	The second secon	create an evolution not covered by an abnormal operating procedure?
	YES	NO
3.	Does this procedure performed, even tho or abnormal operati	create an evolution that will seldom be ugh it is covered by an existing normal ng procedure?
	YES	NO
4.	surveillance test t	create an infrequently performed hat involves complicated sequencing, or an unusual configuration?
	YES	NO
5.	Does this procedure procedure in conjunctorial procedures?	require the use of special test ction with existing operating or testing
	YES	NO

IF the answer to questions 1 AND at least one other is "YES", THEN this procedure is an infrequently performed test or evolution, and requires a briefing in accordance with AI-500 prior to being performed. The procedure shall have a sign off step, either a prerequisite or its first step, that documents this briefing.

PROCEDURE DESCRIPTION, REASONS, AND REFERE	NCES
Procedure: MAR 96-04-12-01, TP-1, Rev # 0 PRR # Title: MAR Function	onal Test Procedure
DESCRIPTION OF NEW PROCEDURE OR CHANGE (Detailed)	
New procedure which will simulate an EFIC-A actuation for relay 3A2-5 and 3A1 them with a jumper placed in RR3A.	1-6, by energizing
The relays will effect the control circuits for EFV-2 and EFP-1; however, neither operate because the motor power for EFV-2 will be tagged OFF, and EFP-1 bre TEST position.	
REASON AND REFERENCES FOR PROCEDURE CHANGE	
To ensure correct operation of the EFIC Actuation A relay 3A1-6, following deletes associated contacts from ASV-204 control circuit.	tion of its
The test will prove that ASV-204 is no longer effected by EFIC actuation, and th EFV-2 have retained their EFIC Auto actuation functions.	at EFP-1 and
Check As Appropriate:	Reference#
[X] Modification [] FCN [] Other Design Related Item	
[] Problem Report [] Precursor Card [] NRC Violation	

[] ITS Amendment [] ITS Bases Change [] FSAR Change

Screening for Applicability of 10 CFR 50.59		
Procedure: MAR 96041201, TP-1, Rev.0 PRR# Title: MAR Functional Test Procedure for ASV-204 EFIC AUTO REMOVAL		
	YES (/)	NO (s)
<ol> <li>Is this a change to the facility as described in the FSAR?         (Use NOD-11, Preparation of Safety, Regulatory, and Environmental Compliance Reviews-Attachment A, as guidance to adequately answer this question).         Because:         This procedure will verify that control circuits affected by the associated MAR, operate per design.     </li> </ol>		x
<ol> <li>Does this affect or change the Improved Technical Specifications or their bases?         (If yes, contact the Manager Nuclear Licensing before proceeding)         Because:         This procedure does not change the configuration of any equipment that is being relied upon to perform a safety function.     </li> </ol>		x
3. Is this a new procedure or the ODCM?	N/A	
4. A yes answer to any question above requires completion of Enclosure 4, 10 CFR 50.59 Evaluation and PAC/DNPO reviews prior to implementation. Are these required?		х
Can this potentially reduce the level of safety of the plant?  (If yes, provide contingency actions AND PRC/DNPO reviews are required prior to implementation)  Because:  This procedure will be performed immediately following completion of the modification activities for ASV-204 control circuit, while it is out of service and not performing any safety function.		x
5. Review Enclosure 5, Examples of Events Which Impact Plant Operations. Can this possibly lead to an event that would impact plant operation?  (If yes, provide contingency actions AND PRC/DNPO reviews are required prior to implementation)  Because:  The end devices associated with the control circuits being tested will be disabled (EFV-2 motor power will be OFF and EFP-1 breaker will be in the test position), to ensure that the esting can have no effect on status of plant equipment.		X

#### ENCLOSURE 1 (Page 1 of 3)

#### ORIGINATOR'S CHECKLIST

-	edure#: 96-04-12-01, TP-1 Current Revision#: 1 PRI edure Title: ASV-204 EFIC AUTO REMOVAL	R#:	
		YES (/)	N/A (/)
1	Obtain the current revision of the procedure from Document Control or electronically. For temporary procedure changes, the working copy may be used.		x
2	Obtain PRR#, new procedure#, or temporary procedure change (TPC) # from Document Control or electronically. For work instructions, use a work request number or use another identifying number.	x	
3	Write a new procedure, work instruction, or mark the pages applicable to any changes by using red link or electronic red line/strikeout methods. For procedures, use the appropriate procedure format in Al-402B, Procedure Writing (Except for EOP/AP/VP).	x	
4*	Attach changed pages to the cover page of the procedure. Other pages may be attached so the continuity of the changes will be understood by persons performing further reviews. For new procedures or work instructions, all pages are included.	×	
5	Complete Enclosure 2, Procedure Description, Reasons, and References.	x	
6*	Obtain the Prucedure Review Package (PRP) from Nuclear Licensing or electronically. For work instructions or new procedures, contact Nuclear Licensing for any related commitments associated with the work instructions or new procedures.	NA	
	a. Complete the Procedure Cross Reference sheet.	•	* X
	b. Ensure the NOCS commitments remain satisfied.	•	* X
	Change the implementing references of the commitments as necessary.	•	×
7	Complete Enclosure 3, Screening for Applicability of 10 CFR 50.59.	x	

These steps should not be performed and the YES or N/A blanks should not be checked (/) for a temporary procedure change. These steps are required to be performed and checked (/) YES or N/A at a later time if the temporary change is to become permanent.

#### ENCLOSURE 1 (Page 2 of 3)

#### **ORIGINATOR'SCHECKLIST**

Proce	dure#96-04-12-01TP-1 , Rev. 1 PRR#	YES (/)	N/A
8*	IF a 10 CFR 50.59 Evaluation is required, as determined by the completion of Enclosure 3, Screening for Applicability of 10 CFR 50.59, THEN complete Enclosure 4, 10 CFR 50.59 Evaluation.	•	x
9*	Complete Enclosure 6, 10 CFR 50.54 Evaluation.	×	
10*	IF this can affect plant safety, the core, reactivity control, the Reactor Protection System, the engineered safeguards systems, or the plant design basis, THEN complete and comply with Enclosure 7, InfrequentlyPerformed Test or Evolution Checklist.	•	x
11*	IF any plant equipmenttag numbers are being added to or deleted from this procedure, THEN complete and mail Enclosure 8, CMIS Database Update Request Form, to the Manager Nuclear Configuration Management.	•	x
12*	Complete Enclosure 9, Notification of New/Revised Procedure (NORP) by determining which Nuclear Operations departments need to be notified of the new procedure/permanen procedure change.	· NA	
13*	IF this is a SP, new procedure, or an infrequentlyperformed test or evolution, THEN complete and attach Enclosure 23, Procedure Review Checklist of AI-402B, Procedure Writing (Except for EOP/AP/VP).	•	×
14	Ensure that correction techniques such as "whiteout," correction tape, paste overs, or similar techniques have not been used.	x	
15*	Internal references to data sheets, enclosures, other sections of the procedure, etc., have been verified to be correct.	* X	
16*	Ensure that Non-Qualitydocuments are identified as "Optional Records Non-Quality" within the procedure as per Al-1100, Retention of Plant Operating Records.	•	×

These steps should not be performed and the YES or N/Ablanks should not be checked (/) for a temporary procedure change. These steps are required to be performed and checked (/) YES or N/Aat a later time if the temporary change is to become permanent.

#### ORIGINATOR'SCHECKLIST

Proced	dure#_96-04-12-01JP-1, Rev.1 PRR#	YES (4)	N/S
17*	Forward the original or copies of this document and supporting enclosures to QualifiedReviewers, as determined from below, using Enclosure 10, Qualified Review/TechnicaReview.		
	<ul> <li>A QualifiedReview, independent of the originator, is required by the department that the procedure's InterpretationContact is a member of.</li> </ul>	NA	
	IF interfacingdepartments'actions or procedures will be impacted,     THEN the interfacingdepartments must perform a QualifiedReview.	•	×
	<ul> <li>IF any item on Enclosure 11, Guidelines for Identification Design Changes, is applicable, <u>THEN</u> Nuclear Engineering Design must perform a Qualified Review.</li> </ul>	•	x
	<ul> <li>Nuclear QualityControl must be a QualifiedReviewer for FPs, MPs, PMs, PTs, SPs, WP-101, and WP-102 that contain changes to or additions of inspection points to ensure inspection points are appropriate.</li> </ul>	•	×
	e. IF this:  1. Involves a change to an established scheduled performance of a procedure as listed in SP-443, MasterSurveillance Plan,  OR  2. Is related to a change to the ImprovedTechnical Specification (ITS) or the ITS bases,  THEN the Senior Nuclear Scheduling Coordinator responsible for surveillance scheduling must be a Technical Reviewer.	•	×
	NOTE: EQ equipmentis designated in CMIS as QQ.  f. IF this involves repair, replacement, or alteration of EQ equipment, THEN a QualifiedReview is required by Nuclear ConfigurationManagement, EQ Group.	•	·
	If this procedure involves repair, replacement, or alteration of EQ equipment,     THEN the cover page of the procedure must be designated "EnvironmentallyQualifiedRelated."	•	×
18*	Ensure QualifiedReviews are completed and any comments have been addressed.	• x	11
19	IF this is a temporary procedure change, THEN complete Enclosure 12, Authorization of a Temporary Procedure Change.		x
20*	Forward this enclosure and the preceding package of documentation, as applicable, to the InterpretationContact for approval of Enclosure 13, InterpretationContact's Checklist.	×	

I have completed this checklist, as applicable, and all appropriate YES or NA blanks are completed.

ORIGINATOR DATE

These steps should not be performed and the YES or N/Ablanks should not be checked (/) for a temporary
procedure change. These steps are required to be performed and checked (/) YES or N/Aat a later time if
the temporary change is to become permanent.

### INTERPRETATION CONTACT'S CHECKLIST

-	INTERPRETATION CONTACT S CHECKETST	T-100	
Pr	ocedure#: 96-04-12-01, TP-1, Rev.O PRR#:	YES (/)	N/A (/)
1	Originator's Checklist, Enclosure 1 is adequately completed.	/	
2	IF this is a new SP, an SP that has received a major technical rewrite, or a procedure identified as an infrequent test or evolution, THEN ensure a simulation, walk through (no manipulation of plant equipment), table talk, or comparison validation has been performed before the procedure is approved by the Interpretation Contact.		/
3	IF this is a procedure identified as an infrequent test or evolution, THEN ensure the procedure will be walk through validated with an end-user during the first performance after the procedure is issued.		/
4	IF this is a new SP, or is a SP that has received a major technical rewrite, THEN notify the Senior Nuclear Scheduling Coordinator responsible for surveillance scheduling that the procedure must be walk through validated with an end user on the next scheduled performance after the procedure is issued.		/
5	IF this is an OP that involves valve changes, THEN ensure adequate administrative controls are in place to control valve positions.	7	1
6	IF the Procedure Cross Reference sheet had any questions answered yes, THEN forward the Procedure Cross Reference sheet to Records Management.		1
7	IF any commitments of the NOCS have any changes to the implementation section, THEN forward the applicable commitments to Nuclear Licensing.		/
В	IF inspection planning is required per CP-113C, Inspection Planning, THEN ensure inspection planning methods are incorporated within this procedure or work instruction.		/

#### INTERPRETATION CONTACT'S CHECKLIST

Procedure #96-04-12-0	1, TP-1, Rev.0	PRR #		
especially if the li	nterpretation Conta	nd any item to the PRC to ct has a plant operation o	review prior to imp r safety concern.	plementation,
Check ONE of the force				
PRC or DNPO rev	nclosure 3, Screenir iew is not required, ures to Document C	ng for Applicability of 10 C procedure can be issued. Control.	FR 50.59 are answ I am forwarding t	rered "No". the applicable
Interpretation Con	tact desires a PRC eview is required pr	ning for Applicability of 10 and DNPO review. for to implementation. I a		
2. Complete ALL of the	e following ONLY fo	or Temporary Procedure C	hanges to become	permanent:
[] Obtain PRR# from	Document Contro	or electronically. PRR#		
[ ] The activities as do with an asterisk, h	esignated on Enclos save been complete	ure 1, Originator's Check d and are attached.	ist, including those	on Enclosure 1
		eted enclosures to Docum manent procedure revision		uance of this
This and other applicable of the series of t	Kf.	Outor Contact		arded as stated above.
PRC Chairman	Date	PRC Mtg No.	DNPO	Date
If required			ð1	i/

# PAUL F. MCKEE

EXHIBIT No. \_\_ (PFM-7)

TECHNICAL SPECIFICATIONS LIMITING CONDITIONS

#### 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

- LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2.
- LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

- LCO 3.0.3 When an LCO is not met, except as provided in the associated ACTIONS, and an associated ACTION is not met or provided, the unit shall be placed in a MODE or other specified condition in which the Specification is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:
  - a. MODE 3 within 7 hours:
  - b. MODE 4 within 13 hours; and
  - MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued

(continued)

#### 3.0 LCO APPLICABILITY

## (continued)

operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.

Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.

#### LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY, the OPERABILITY of other equipment, or variables to be within limits. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the required testing.

#### LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system Specification ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.6.2.16. "Safety function Determination Program." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the Specification in which the loss of safety function exists are required to the entered.

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.2 ECCS-Operating

LCO 3.5.2 Two ECCS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

#### ACTIONS

CONDITION		REQUIRED ACTION		COMPLETION TIME	
Α.	One or more trains inoperable.	A.1	Restore train(s) to OPERABLE status.	72 hours	
	At least 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available.				
В.	Required Action and associated Completion Time not met.	B.1 AND	Be in MODE 3.	6 hours	
		B.2	Be in MODE 4.	12 hours	

#### 3.7 PLANT SYSTEMS

#### 3.7.5 Emergency Feedwater (EFW) System

LCO 3.7.5 Two EFW trains shall be OPERABLE.

Only one EFW train, which includes a motor driven pump, is required to be OPERABLE in MODE 3 with steam generator pressure < 200 psig.

APPLICABILITY: MODES 1, 2, and 3.

#### ACTIONS

CONDITION			REQUIRED ACTION	COMPLETION TIME	
Α.	One steam supply to the turbine driven EFW pump inoperable.	A.1	Restore steam supply to OPE ABLE status.	7 days  AND  10 days from discovery of failure to meet the LCO	
В.	One EFW train inoperable for reasons other than Condition A.	B.1	Restore EFW train to OPERABLE status.	72 hours  AND  10 days from discovery of failure to meet the LCO	

(continued)

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
С.	Required Action and associated Completion Time of Condition A	C.1	Be in MODE 3.	6 hours
	or B not met.	C.2	Be in MODE 4.	12 hours
D.	Two EFW trains inoperable.	D.1	Initiate action to restore one EFW train to OPERABLE status.	Immediately

#### 3.8 ELECTRICAL POWER SYSTEMS

#### 3.8.1 AC Sources-Operating

- LCO 3.8.1 The following AC electrical power sources shall be OPERABLE:
  - Two qualified circuits between the offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System; and
  - b. Two emergency diesel generators (EDGs) each capable of supplying one train of the onsite Class IE AC Electrical Power Distribution System.

APPLICABILITY: MODES 1, 2, 3, and 4.

#### ACTIONS

CONDITION		REQUIRED ACTION		COMPLETION TIME	
Α.	One required offsite circuit inoperable.	A.1	Perform SR 3.8.1.1 for OPERABLE required offsite circuit.	1 hour	
		AND		Once per 8 hours thereafter	
		A.2	Declare required feature(s), with no offsite power available, inoperable when its redundant required feature(s) are inoperable.	24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s)	
		AND			
				(continued)	

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CONDITION		REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.3	Restore required offsite circuit to OPERABLE status.	72 hours  AND 6 days from discovery of failure to meet LCO
B. One EDG inoperable.	B.1	Perform SR 3.8.1.1 for OPERABLE offsite circuit(s).	1 hour  AND  Once per 8 hours thereafter
	AND		
	8.2	Declare required feature(s), supported by the inoperable EDG, inoperable when its redundant required feature(s) are inoperable.	4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)
	AND		
	B.3.1	Determine OPERABLE EDG is not inoperable due to common cause failure.	24 hours
	QR		
	B.3.2	Perform SR 3.8.1.2 for OPERABLE EDG.	24 hours
	AND		
	4		(continued

#### ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME	
В.	(continued)	B.4	Restore EDG to OPERABLE status.	72 hours  AND 6 days from discovery of failure to meet LCO	
с.	Two required offsite circuits inoperable.	C.1	Declare required feature(s) inoperable when its redundant required feature(s) are inoperable.	12 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s)	
		AND			
		C.2	Restore one required offsite circuit to OPERABLE status.	24 hours	

(continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
D.	One required offsite circuit inoperable.  AND  One EDG inoperable.	Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems—Operating," when Condition D is entered with no AC power source to one train.		
		D.1	Restore required offsite circuit to OPERABLE status.	12 hours
		<u>OR</u>		
		D.2	Restore EDG to OPERABLE status.	12 hours
Ε.	Two EDGs inoperable.	E.1	Restore one EDG to OPERABLE status.	2 hours
F.	Required Action and associated Completion Time of Condition A. B. C. D. or E not met.	F.1	Be in MODE 3.	12 hours
		AND		
	o, c, b, or E not met.	F.2	Be in MODE 5.	36 hours
G.	Three or more required AC sources inoperable.	G.1	Enter LCO 3.0.3.	Immediately