BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase of Progress Energy Florida, Inc.

Docket No. 050078

Submitted for filing: April 29, 2005

DIRECT TESTIMONY OF DALE E. YOUNG

On behalf of PROGRESS ENERGY FLORIDA

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EPSC-COMMISSION CLERK

DALE E. YOUNG

1	ſ.	Introduction and Summary.
2	Q.	Please state your name and business address.
3	A.	My name is Dale E. Young. My business address is 15760 West Power Line Street,
4		Crystal River, Florida 34428.
5		
6	Q.	By whom are you employed and in what capacity?
7	A.	I am employed by Progress Energy Florida ("PEF" or the "Company") in the capacity
8		of Vice President – Crystal River Nuclear Plant.
9		
10	Q.	What are the duties and responsibilities of your position with PEF?
11	Α.	I am responsible for the safe and efficient operation of PEF's Crystal River Unit 3
12		nuclear power plant ("CR3").
13		
14	Q.	Please describe your educational background and professional experience.
15	A.	From 1969 to 1977, I served as a Civil Engineering Officer in the United States Air
16		Force, where I was responsible for a number of military construction projects. I
17		attended college while in the service and received my Bachelor of Science degree in
18		Electrical Engineering from the University of Missouri at Columbia in 1973. I later
19		earned a Master's Degree in Business and Management from Webster College in
20		1977. Upon my discharge from the Air Force in 1977, I was employed as a Nuclear
21		Plant Engineer with the Westinghouse Bettis Division, where I was responsible for
22		operation and maintenance of a Naval Prototype plant used to train Navy nuclear

operators. I moved to Union Electric Company in 1979 and was employed in Fulton, Missouri, at Union Electric's Callaway Plant, a 1200 MW pressurized water reactor plant. I held various engineering and management positions over the fifteen year period I worked at the Callaway Plant, including Shift Supervisor, Maintenance Manager, and Operations Manager. I held a Senior Nuclear Reactor's License from 1984 through 1994. In 1994, I was employed by Carolina Power and Light Company ("CP&L") at the Robinson Nuclear Plant in South Carolina. I was the Plant Manager from 1994 to 1997, when I was promoted to Director of Site Operations. I held that position until 1998, when I was promoted to Site Vice President, a position I held until December 2000. Since December 2000, I have been employed by Progress Energy as Vice President – Crystal River Nuclear Plant. I am a Registered Professional Engineer in the state of Missouri.

Q. What is the purpose of your direct testimony?

A. I appear on behalf of PEF to support the reasonableness of the Nuclear Generation portion of the Company's Capital and Operating and Maintenance ("O&M") expenses.

Q. Do you have any exhibits to your testimony?

- A. Yes, I have prepared or supervised the preparation of the following exhibits to my direct testimony:
 - Exhibit No. __ (DEY-1), a list of the Minimum Filing Requirements (MFRs)
 Schedules I sponsor or co-sponsor.
 - Exhibit No. __ (DEY-2), CR3 Non-Fuel O&M Two-Year Average Cost.

- Exhibit No. __ (DEY-3), CR3 Net Generation.
- Exhibit No. __ (DEY-4), PEF's 2005 Nuclear Decommissioning Study.
- Exhibit No. __ (DEY-5), Nuclear Regulatory Commission 2005 Annual
 Assessment Letter.

These exhibits are true and accurate.

Q. Do you sponsor any schedules of the Company's Minimum Filing Requirements (MFRs)?

- A. Yes, I sponsor in whole or in part the MFR schedules listed on Exhibit No. ____(DEY-1). These schedules are true and correct, subject to their being updated in the course of this proceeding.
- Q. Please summarize your testimony.
- A. The Crystal River Unit 3 nuclear plant is operating at the highest level of efficiency and reliability in the plant's history. Much of this achievement is attributable to careful planning and cost control on the part of Company management and to industry-wide technological advances. The combined result is that CR3 continues to rank in the top quartile of all U.S. nuclear plants in most key performance areas.

We see this operational excellence continuing in future years. PEF is committed to staying abreast of industry best practices through participation in information exchange programs among leading nuclear operators and to maintaining a strong working relationship with regulatory authorities. Our goal is to balance an uncompromising operating philosophy with careful cost control so that the performance of CR3 consistently remains a top performer.

II. Historical Perspective on Nuclear Operations.

- Q. Please provide us with an overview of actions the Company has taken since its last rate case to maintain and improve operations at CR3.
- A. The nuclear power industry continues to show positive advancements since the Company's last rate review in 2002. Average capacity for the industry is at an all-time high, and average production costs continue to be lower than coal-fired plants. These continued industry advancements, combined with a number of successful management initiatives, have allowed PEF to continue increasing the reliability and performance of CR3 without compromising the safety of our operations.

We continue to focus on transferring maintenance activities from planned maintenance outages to on-line work. This strategy provides cost savings to our customers by decreasing plant outage time. For example, we developed a submittal to the U.S. Nuclear Regulatory Commission ("NRC") to request approval to perform our diesel maintenance on-line versus during an outage. After a rigorous technical review process, the NRC approved our request and we now have our diesel maintenance scheduled during on-line periods and not during our upcoming outage. This will allow previously scheduled outage diesel resources to be utilized for other outage related maintenance projects, thus reducing the time and cost of the upcoming outage.

The Company also continues to focus on improving its employee training and development so that tasks performed during planned outages are accomplished as efficiently as possible. Process benchmarking plays an important role by allowing us to identify and implement industry best practices in specific areas of operation

and maintenance. Through better planning and training, we are now able to complete as much work in a short planned outage as was previously accomplished in much longer outages.

In the area of refueling, the Company continues to take advantage of improved benchmarking, planning, and training to reduce downtime substantially and to increase cost savings. In 2003, the plant refuel outage was an outstanding 32 days, which included the reactor vessel head replacement and extensive steam generator inspections. This was an industry world record at the time for the least number of outage days with a reactor vessel head replacement. Our next outage is scheduled for 28 days and again includes extensive steam generator inspections.

Staff reductions also continue to play a role in CR3's success. Through careful planning and organizational changes, our staffing levels are consistent with those of the top operating plants in the country. Since the last rate review, CR3 has continued to benefit from the merger into the Progress Energy Nuclear Generation fleet by eliminating duplicate functions and adopting an organizational structure similar to Progress Energy's other nuclear plants. Our year-end on-site staffing level for 2004 was 501 Company employees, down from 575 Company employees in 2001. This has greatly decreased our annual operating costs without sacrificing plant safety or performance.

We have also made physical improvements to the plant, which have increased the plant's operating efficiency. For example, in 2003, PEF replaced the reactor vessel head after identifying a small crack in the reactor head. By planning in advance to replace the head, the Company reduced future inspection requirements during outages, which results in lower operational costs. This proactive decision

also allowed for a cost controlled project approach for the head replacement versus other utilities that were required to replace their reactor heads during a forced outage prior to going back on line.

In addition, in February 2003, the plant completed a power uprate of 4 megawatts. The cost of this power uprate was recovered within the first seven months of the upgrade with the increased power production.

III. Crystal River Nuclear Plant Operating Performance.

- Q. Have the efforts you described above been effective in improving the performance of the Company's Nuclear Operations?
- A. Very much so. CR3 continues to rank in the top quartile of all U.S. nuclear plants with an annual capacity factor of 99.2 percent in 2004. Our three-year capacity factor for the years 2002-2004 was also in the top quartile, at 96.4 percent.

We have coupled these improvements in plant reliability with significant reductions in generation costs. In 2001, the annual non-fuel production cost at CR3 was 14.8 Mills/KWh, and in 2004, was 11.0 Mills/KWh, which is in the industry top quartile for single unit plants. Our two-year average non-fuel production cost has also steadily improved, decreasing from 14.7 Mills/KWh for the years 2000-2001 to 11.8 Mills/KWh for the years 2003-2004. (See Exhibit Nos. ____ (DEY-2) and ____ (DEY-3).

Importantly, these improvements have been realized without compromising safety or operational excellence. Indeed, as measured by the Institute of Nuclear Power Operations ("INPO") index, a recognized indicator of overall plant safety,

CR3 ranks among the best in the country with scores of 98.8 in the year 2001 and 97.3 for 2004.

Since the last rate review, we have also considerably reduced the radiation exposure rate. In 2002, the plant had a record year for the lowest exposure rate in the plant's history at 5 rem. In 2004, we set a new plant record with an exposure rate of 4 rem. This places CR3 in the industry upper quartile for minimizing radiation exposure.

Q. What has been the impact of increased nuclear security requirements since 2001?

A. This has been a major focal point for the NRC and the Company since 2001. We have dedicated considerable resources to bring CR3 into compliance with the various NRC Security Orders and the Maritime Security Act issued since 2001. As a comparison to other NRC Region II (Southeast) nuclear plants, CR3 implemented the various security orders for approximately 50% less than the comparison group. CR3 Security staffing is also considerably less than the average of the other Region II plants.

Since the last rate review, the Company reorganized the nuclear security organization to provide the needed increased security focus and leveraged the security resources of Progress Energy's entire nuclear fleet. This reorganization strategy and security resource focus provided for a cost- effective approach to the implementation of the various security orders.

Q. Do you have plans to extend the license for the nuclear plant?

A. Yes, we do. The current license expires in 2016 and we plan to submit our license renewal application to the NRC in 2009. The submittal will request a license extension of an additional 20 years, to 2036.

Q. Are there other regulatory measures of performance the Commission should consider?

A. Yes. The federal government measures nuclear performance with Performance Indicators that are updated monthly and are available for public review through the NRC Web site. Plant inspection assessments are performed by NRC personnel on a regular basis with performance graded in each area. CR3 has maintained green status (the NRC's highest rating) in all areas since our last rate review.

In addition, CR3 management has been dedicated to continuing a positive relationship with the NRC and has been successful in maintaining good regulatory performance. Since the last rate review, the plant has not received any cited violations resulting from NRC inspections. The NRC continues to keep CR3 on a routine baseline inspection schedule and currently does not plan to add special inspection requirements beyond the current baseline. (See Exhibit No. ____ (DEY-5)).

IV. Proposed Nuclear Operations Cost.

Q. Please provide an overview of the Nuclear Operations costs that the Company is projecting for the 2006 test year.

These figures are set forth in Schedules C-37 and C-41 to the Company's MFRs.

We are projecting an increase from benchmark in the amount of \$3.3 million. For the

test year period, 32 Company employee positions were eliminated for a cost decrease of approximately \$2 million but this decrease is offset by increased security costs of \$3.3 million. Our material and contracts costs have also decreased during the period in the amount of \$2 million. This decrease is a result of improved project focus and controls along with a decrease in the use of contract labor vs. increased use of existing in-house Company labor. We also have an increase in our steam generator inspection costs during planned outages through 2007 of \$4 million per outage. We plan to replace the steam generators in 2009.

- Q. Would you explain the procedures the Company has in place to monitor and control Nuclear Operations costs.
- A. PEF has adopted a three-step approach to cost control so that expenditures are scrutinized and evaluated first at the strategic planning phase, again at the design phase, and once more at the implementation phase. All plant modifications must be supported by sound business considerations and cost-benefit analysis in addition to operational justifications. These considerations are carefully assessed at the outset of each phase to take into account any change in circumstances or market conditions. Cost estimates are thoroughly examined for reasonableness and accuracy. This iterative approach has proven quite successful in allowing the Company to assess the reasonableness of O&M and capital expenditures throughout the life of a project.
- Q. Would you please explain the adjustments made to the Company MFRs.

A. We have included a Company adjustment to the MFRs to account for updated costs relating to the "last core" of nuclear fuel and end-of-life nuclear materials and supplies ("M&S") as they relate to plant life extension through 2036. The cost of the last core of nuclear fuel is established to be \$26 million, less the amount already expensed from 2001 through 2004 (4.4 million), which the Company will prorate over the remaining plant life to decrease net operating income ("NOI") by \$.7 million pre-tax annually. We estimate the value of end-of-life M&S to be \$30 million, which, prorated over the remaining plant life, results in a \$900 Thousand annual decrease in pre-tax NOI.

- Q. Taking the last core adjustment first, please explain how PEF arrived at \$26 million as the estimated value of surplus fuel remaining at end of life.
- A. The current budget projection for 2013 core's end-of-cycle value is approximately \$30 million. We assume that the final operating cycle will be 18 months instead of 24 months and that the fuel batch size will be reduced from 73 to 54 assemblies. To account for anticipated last cycle loading and operating efficiencies, we applied the ratio of 3/4 to the \$30 million current end-of-cycle fuel value, which equals \$22.5 million. We then applied the ratio of 54/73 to the \$22.5 million to account for the reduced fuel batch size, which equals \$16.6 million in 2013 dollars. To account for future increases in fuel cost, the \$16.6 million value is adjusted by 2 percent per year for 23 years to arrive at \$26 million as the estimated value of the last core.
- Q. Is it possible to operate during the final cycle so that no surplus fuel remains at end of life?

A. No. Every core must have excess energy to counter power-reducing effects that necessarily exist during operation. For example, nuclear fuel must have enough excess energy to overcome the negative effects of coolant and fuel temperature, fission products, and required enrichment. This surplus energy must be sufficient to last for the duration of the current operating cycle and for the next one or two cycles of operation. Ordinarily, the excess energy remaining in a fuel assembly at the end of a particular operating cycle is used in the next one or two cycles of operation. At the end of the last operating cycle, however, there are no future cycles in which to use the surplus fuel.

Q. Can the surplus fuel remaining at end-of-life be used in another nuclear reactor?

- A. No. Because different reactors use different core designs, the surplus fuel remaining at end-of-life cannot be used in another reactor. Moreover, the fuel reprocessing that would be required to support different core designs is restricted in the United Sates.
- Q. Turning next to the adjustment for M&S, please explain how you arrived at the value of \$30 million for materials and supplies remaining at end-of-life.
- A. We currently have \$42 million in inventory. \$6 million of this is in spare parts and supplies that are capitalized over the remaining plant life and which will have no value at end of life. An additional \$6 million in consumable parts and supplies will be controlled so as to minimize remaining inventory at end-of-life. The remaining \$30 million is in spare replacement parts and supplies that we must keep in

inventory to make certain that we are operating safely and reliably. While this value is subject to some fluctuation over time, we can reasonably estimate that the value of M&S that we must maintain in inventory to ensure the safety and reliability of our operation will be approximately \$30 million. Accordingly, we can reasonably conclude that the value of M&S on hand at end-of-life will be \$30 million.

Q. Is there any way to recoup the value of these M&S, for example, selling them to other nuclear plants at end of life?

A. It would be cost prohibitive to do so. Most of these M&S have been specially manufactured for use at CR3 and all have been qualified by thorough engineering analysis to be suitable replacements for existing components in service at CR3. The items at issue include such things as spare pumps and subassemblies, motors, control modules, circuit boards, switch gear, circuit breakers, valves and valve parts, ventilation parts and filters, radiation monitoring parts, and similar types of equipment. Before these items could be used in another nuclear plant, an extensive engineering analysis would be required to confirm their suitability as replacements for existing components at that particular plant. This expensive and time-consuming process makes it impractical to transfer M&S among different nuclear plants.

Moreover, the potential market for these specialized M&S is quite limited. There are only a few nuclear plants with designs similar to CR3, and those plants will be facing end-of-life issues at approximately the same time as CR3. Because of this, the prospect of finding a buyer for CR3's M&S remaining at end-of-life is extremely unlikely.

Q. What is the status of the nuclear decommissioning funding?

A. PEF completed an updated decommissioning cost analysis study for CR3 in 2005.

(See Exhibit No. ___ (DEY-4)). The least cost alternative is currently estimated at \$668.7 million in 2005 dollars. The NRC-approved decommissioning alternative referenced in the study is for decontamination of all equipment and structures containing radioactive contaminates and removal or decontamination to a level that permits the property to be released for unrestricted use shortly (within 10 years) after cessation of operations. The current decommissioning fund balance is sufficient to cover this cost to the end of extended plant life in 2036.

Q. Are PEF's projected expenses for Nuclear Generation for 2006 reasonable?

A. Yes, they are. The Company's Nuclear Operations are more reliable and efficient than ever before, and these operational improvements have yielded significant cost savings for our customers without compromising the safety of our operations. The merger between CP&L and Florida Progress has allowed us to streamline operations even further, so that CR3 is now on par with the top plants in the country. The expenses projected for the 2006 test year will allow us to maintain the superior performance levels we have seen at CR3 in recent years.

Q. Does this conclude your direct testimony?

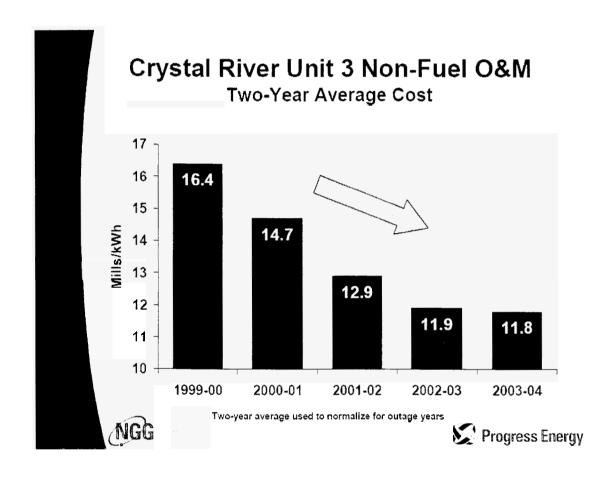
A. Yes.

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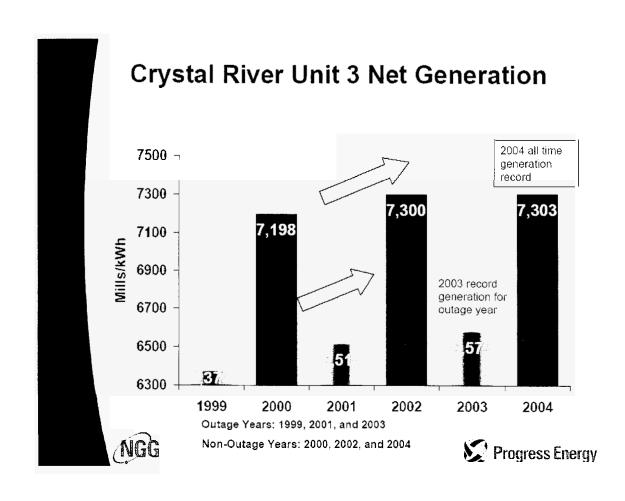
MINIMUM FILING REQUIREMENT SCHEDULES Sponsored, All or In Part, by Dale E. Young

Schedule #	Schedule Title
B-16	Nuclear Fuel Balances
C-6	Budgeted Versus Actual Operating Revenues and Expenses
C-33	Performance Indices
C-37	O&M Benchmark Comparison by Function
C-38	O&M Adjustments by Function
C-39	Benchmark Year Recoverable O&M Expenses by Function
C-43	Security Costs
F-4	NRC Safety Citations

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DOCKET NO. 050078-EI PROGRESS ENERGY FLORIDA EXHIBIT NO. ____ (DEY-4)

DUE TO VOLUME THIS EXHIBIT HAS BEEN

FILED SEPARATELY IDENTIFIED AS:

Exhibit No. ___ (DEY-4)
2005 NUCLEAR DECOMMISSIONING STUDY
Volume 1 of 1



UNITED STATES NUCLEAR REGULATORY COMMISSION

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REGION II SAM NUNN ATLANTA FEDERAL CENTER 61 FORSYTH STREET, SW, SUITE 23T85 ATLANTA, GEORGIA 30303-8931

March 2, 2005

Mr. Dale E. Young, Vice President Crystal River Nuclear Plant (NA1B) ATTN: Supervisor, Licensing & Regulatory Programs 15760 West Power Line Street Crystal River, FL 34428-6708

SUBJECT: ANNUAL ASSESSMENT LETTER - CRYSTAL RIVER NUCLEAR PLANT

(NRC INSPECTION REPORT 05000302/2005001)

Dear Mr. Young:

On February 9, 2005, the NRC staff completed its end-of-cycle plant performance assessment of Crystal River Nuclear Plant. The end-of-cycle review for Crystal River involved the participation of the reactor technical divisions in evaluating performance indicators (Pls) for the most recent quarter and inspection results for the period from January 1 through December 31, 2004. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility. This will allow you an opportunity to prepare for these inspections and to inform us of any planned inspections that may conflict with your plant activities. This performance review and the enclosed inspection plan do not include physical protection information. A separate end-of-cycle performance review letter, designated and marked as "Exempt for Public Disclosure in accordance with 10 CFR 2.390", will include the physical protection review and a resultant inspection plan.

Overall, Crystal River operated in a manner that preserved public health and safety and fully met all cornerstone objectives. Plant performance for the most recent quarter, as well as for the first three quarters of the assessment cycle, was within the Licensee Response Column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all PIs indicating performance at a level requiring no additional NRC oversight (Green). Therefore, we plan to conduct only reactor oversight process (ROP) baseline inspections at your facility through September 30, 2006. We also plan to conduct a non-ROP inspection which includes TI 2515/160, NRC Bulletin 2004-01: Inspection of Alloy 82/182/600 Materials Used in the Fabrication of Pressurizer Penetrations and Steam Space Piping Connections at Pressurized-Water Reactors.

The enclosed inspection plan details the inspections, less those related to physical protection, scheduled through September 30, 2006. The inspection plan is provided to minimize the resource impact on your staff and to allow for scheduling conflicts and personnel availability to be resolved in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The inspections in the last nine months of the inspection plan are tentative and may be revised at the mid-cycle review meeting.

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact me at 404-562-4560 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/RA/

Joel T. Munday, Chief Reactor Projects Branch 3 Division of Reactor Projects

Docket No. 50-302 License No. DPR-72

Enclosure: Crystal River Inspection/Activity Plan

cc w/encl: (See page 3)

FPC

cc w/encl:
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Electronic Mail Distribution

Jon A. Franke
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Crystal River Inspection / Activity Plan 03/01/2005 - 09/30/2006

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Unit			No. of Staff	Planne	Dates	Inspection
Number	Inspection Activity	Title	on Site	Start	End	Туре
	EB1SSDPC - SSDPC	PRE-INSPECTION VISIT	1			
3	IP 7111121	Safety System Design and Performance Capability		03/28/2005	03/30/2005	Baseline Inspections
	PS2- EP - EP INS	PECTION	1			
3	IP 7111402	Alert and Notification System Testing		04/25/2005	04/29/2005	Baseline Inspections
3	IP 7111403	Emergency Response Organization Augmentation Testing		04/25/2005	04/29/2005	Baseline Inspections
3	IP 7111404	Emergency Action Level and Emergency Plan Changes		04/25/2005	04/29/2005	Baseline Inspections
3	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies		04/25/2005	04/29/2005	Baseline Inspections
3	IP 71151	Performance Indicator Verification		04/25/2005	04/29/2005	Baseline Inspections
	EB1SSDPC - SAFET	Y SYSTEM DESIGN & PERF. CAPABILITY	4			
3	IP 7111121	Safety System Design and Performance Capability		04/25/2005	04/29/2005	Baseline Inspections
3	IP 7111121	Safety System Design and Performance Capability		05/09/2005	05/13/2005	Baseline Inspections
	MTN-MR - MR EF	FECTIVENESS	1			
3	IP 7111112B	Maintenance Effectiveness		08/15/2005	08/19/2005	Baseline Inspections
	OL PREP - INITIAL	EXAM PREP	3			
3	V23237	CRYSTAL RIVER/EXAMS AT POWER FACILITIES		08/15/2005	08/19/2005	Not Applicable
	OL EXAM - INITIAL	LEXAM	3			
3	V23237	CRYSTAL RIVER/EXAMS AT POWER FACILITIES		09/12/2005	09/16/2005	Not Applicable
	PS1-RP - RP OC	CUPATIONAL BASELINE - WEEK 1	3			
3	IP 7112101	Access Control to Radiologically Significant Areas		10/31/2005	11/04/2005	Baseline Inspections
3	IP 7112102	ALARA Planning and Controls		10/31/2005	11/04/2005	Baseline Inspections
3	IP 7112202	Radioactive Material Processing and Transportation				Baseline Inspections
3	IP 71151	Performance Indicator Verification		10/31/2005	11/04/2005	Baseline Inspections
		VICE INSPECTION	2			
3	IP 7111108P	Inservice Inspection Activities - PWR		11/07/2005	11/11/2005	Baseline Inspections
		60 U-3: PZR PENETRATION NOZZLES	1			
3	IP 2515/160	Pzr Pene Nozzles & Stm Space Piping Connections in U.S. PWRs [NRC Bulletin 2004-01]	_	11/07/2005	11/11/2005	Safety Issues
		GENERATOR ISI	2	444410005	4.440/0005	5
3	IP 7111108P	Inservice Inspection Activities - PWR	_	11/14/2005	11/18/2005	Baseline Inspections
_		CUPATIONAL BASELINE - WEEK 2	3	444440005	44400000	Daniela Internationa
3	IP 7112101	Access Control to Radiologically Significant Areas			11/18/2005	*
3	IP 7112102	ALARA Planning and Controls				Baseline Inspections
3	IP 7112202	Radioactive Material Processing and Transportation				Baseline Inspections
3	IP 71151	Performance Indicator Verification		11/14/2005	11/18/2005	Baseline Inspections
		ICATIONS/10CFR50.59	4	10/05/0055	101001000	D P L L L L C C
3	IP 7111102	Evaluation of Changes, Tests, or Experiments		12/05/2005	12/09/2005	Baseline Inspections

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Unit	Unit •			No. of Staff Planned		Inspection
Number	Inspection Activity	Title	on Site	Start	End	Type
American de la mariadada de la companya del companya del companya de la companya	EB1-MODS - MODIF	CATIONS/10CFR50.59	4			
3	IP 7111117B	Permanent Plant Modifications		12/05/2005	12/09/2005	Baseline Inspections
	MTN-HS - HEAT	SINK	1			
3	IP 7111107B	Heat Sink Performance		01/09/2006	01/13/2006	Baseline Inspections
	OL RQ - REQU	AL INSPECTION	2			
3	IP 7111111B	Licensed Operator Requalification Program		01/30/2006	02/03/2006	Baseline Inspections
	PS2-EP - EP EX	ERCISE	3			
3	IP 7111401	Exercise Evaluation		04/24/2006	04/28/2006	Baseline Inspections
3	IP 7111404	Emergency Action Level and Emergency Plan Changes		04/24/2006	04/28/2006	Baseline Inspections
3	IP 71151	Performance Indicator Verification		04/24/2006	04/28/2006	Baseline Inspections
	DRP - PI&R		4			
3	IP 71152B	Identification and Resolution of Problems		06/05/2006	06/23/2006	Baseline Inspections