

DEC 27 1985

Docket No.: 50-382

Mr. R. S. Leddick
Louisiana Power and Light Company
317 Baronne Street, Mail Unit 17
New Orleans, Louisiana 70160

Dear Mr. Leddick:

Subject: Issuance of Amendment No. 2 to Facility Operating License No. NPF-38
for Waterford 3

The Commission has issued the enclosed Amendment No. 2 to Facility Operating License No. NPF-38 for the Waterford Steam Electric Station, Unit 3. The amendment consists of a change to the Technical Specifications in response to your application transmitted by letter dated August 1, 1985.

The amendment revises Technical Specification 3/4.7.8 by changing the first inservice inspection period for inaccessible snubbers.

A copy of the Safety Evaluation supporting the amendment is also enclosed.

Sincerely,

ORIGINAL SIGNED BY

George W. Knighton, Director
PWR Project Directorate No. 7
Division of PWR Licensing-B

Enclosures:

- 1. Amendment No. 2 to NPF-38
- 2. Safety Evaluation

cc: See next page

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Mr. R. S. Leddick
Louisiana Power & Light Company

Waterford 3

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

LOUISIANA POWER AND LIGHT COMPANY
DOCKET NO. 50-382
WATERFORD STEAM ELECTRIC STATION, UNIT 3
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 2
License No. NPF-38

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment, dated August 1, 1985, by Louisiana Power and Light Company (licensee), complies with standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-38 is hereby amended to read as follows:

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(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 2, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in this license. LP&L shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



George W. Knighton, Director
PWR Project Directorate No. 7
Division of PWR Licensing-B

Attachment:
Changes to the Technical
Specifications

Date of Issuance: **DEC 27 1985**

ATTACHMENT TO LICENSE AMENDMENT NO. 2
TO FACILITY OPERATING LICENSE NO. NPF-38
DOCKET NO. 50-382

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

Amendment Pages

3/4 7-21
3/4 7-22

PLANT SYSTEMS

3/4.7.8 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.8 All hydraulic and mechanical snubbers shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those OPERATIONAL MODES.

ACTION:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.8g. on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.8 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these groups (inaccessible and accessible) may be inspected independently according to the schedule below. The first inservice visual inspection of each type of snubber shall be performed after 4 months* but within 10 months of commencing POWER OPERATION and shall include all hydraulic and mechanical snubbers. If all snubbers of each type on any system are found OPERABLE during the first inservice visual inspection, the second inservice visual inspection of that system shall be performed at the first refueling outage. Otherwise, subsequent visual inspections of a given system shall be performed in accordance with the following schedule:

*Visual inspection of the inaccessible snubbers can be performed at the first available outage after 2 months of commencing Power Operation.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

<u>No. of Inoperable Snubbers of Each Type on Any System per Inspection Period</u>	<u>Subsequent Visual Inspection Period**#</u>
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) there are no visible indications of damage or impaired OPERABILITY and (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type on that system that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specifications 4.7.8f. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule for each of the related systems.

d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

**The inspection interval for each type of snubber on a given system shall not be lengthened more than one step at a time unless a generic problem has been identified and corrected; in that event the inspection interval may be lengthened one step the first time and two steps thereafter if no inoperable snubbers of that type are found on that system.

#The provisions of Specification 4.0.2 are not applicable.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REGULATION REGULATION
SUPPORTING AMENDMENT NO. 2 TO FACILITY OPERATING LICENSE NO. NPF-38

LOUISIANA POWER AND LIGHT COMPANY
WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION

By letter dated August 1, 1985, Louisiana Power and Light Company (licensee), requested an emergency change to the Technical Specifications (Appendix A to Facility Operating Licensee NPF-38) for the Waterford Steam Electric Station, Unit 3. The proposed change would revise Technical Specification 3/4.7.8 by changing the first inservice inspection period for inaccessible snubbers from four months to two months post-power operation.

2.0 DISCUSSION

Technical Specification 4.7.8 delineates the surveillance requirements for hydraulic and mechanical snubbers. In particular, item (b) allows for independent inspection of accessible and inaccessible snubbers, and requires that the first inservice visual inspection of each type of snubber shall be performed after four months but within 10 months of commencing "POWER OPERATION" and shall include all hydraulic and mechanical snubbers. The purpose of this required inspection is to identify inoperable snubbers caused by thermal shakedowns in systems during testing and startups after a reasonable "settledown" period of power operation.

Waterford 3 power operation commenced on March 18, 1985, placing the beginning of the initial snubber inservice visual inspection period at July 18, 1985. However, in order to take advantage of an unscheduled outage, Louisiana Power and Light Company (LP&L) performed an inservice visual inspection of inaccessible hydraulic and mechanical snubbers during mid-June, 1985, i.e., - approximately three months after commencing power operation.

The requested Technical Specification change would alter the beginning of the first inservice visual inspection period from four months to two months post-power operation for inaccessible snubbers only. Technical Specification 4.7.8.b would be footnoted to reflect the change. With this change, LP&L will be allowed to take credit for the June, 1985 visual inspection of inaccessible snubbers.

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3.0 EVALUATION

The proposed change allows LP&L to take credit for a visual inspection of inaccessible snubbers conducted approximately three months after commencing power operation rather than the four months required by the existing Technical Specification. The time period from initial power operation to the beginning of the visual inspection period is intended to ensure exposure of the snubbers to representative plant conditions.

The operating history of Waterford 3 over the initial three-month period covers several heat-ups and cool-downs along with numerous plant trips, both planned and inadvertent. This three-month history constitutes a representative exposure to plant conditions for validation of the initial snubber inspection and validation of snubber operability. An additional month's delay of the initial inspection to mid-July provides little additional exposure (one heat-up and several inadvertent trips) due to outages experienced during that time.

Additionally, the proposed change is in conformance with ANSI/ASME Standard OM4-1982, "Dynamic Restraints Examination and Performance Testing". Section 3.2.3, Inservice Examination Frequency, states: "The initial inservice examination of all snubbers shall be initiated after at least 2 months of power operation and shall be completed prior to 12 calendar months after initial criticality."

The proposed change deals only with a scheduling interval and introduces no new systems, procedures or modes of operation. As discussed above, the inaccessible snubbers received a representative exposure to plant conditions prior to the initial inspection, ensuring an adequate basis for operability determination. Subsequent inaccessible snubber inspections will be scheduled in accordance with the existing Technical Specification formula for inspection frequency. Three out of a total of 210 snubbers inspected by the Waterford 3 plant were identified as having deficiencies during the inspection performed after three months of power operation. The staff has reviewed the inspection results, including types of failures and the corrective actions taken and concludes that the intended purpose of the inspection has been accomplished. Therefore, the staff concludes that the proposed changes are acceptable.

4.0 CONTACT WITH STATE OFFICIAL

The NRC staff has advised the Administrator, Nuclear Energy Division, Department of Environmental Quality, State of Louisiana of the proposed determination of no significant hazards consideration. No comments were received.

5.0 ENVIRONMENTAL CONSIDERATION

This amendment involves changes in the installation or use of facility components located within the restricted area. The staff has determined that the amendment involves no significant increase in the amounts of any effluents that may be released offsite and that there is no significant increase in individual or

commulative occupation radiation exposure. The Commission has previously issued proposed findings that the amendment involves no significant hazards consideration, and there has been no public comment on such findings. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Sec. 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

6.0 CONCLUSION

Based upon our evaluation of the proposed changes to the Waterford 3 Technical Specifications, we have concluded that: there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public. We, therefore, conclude that the proposed changes are acceptable, and are hereby incorporated into the Waterford 3 Technical Specification.

Dated: **DEC 27 1985**

DEC 27 1985

ISSUANCE OF AMENDMENT NO. 2 TO FACILITY OPERATING
LICENSE NP. NPF-38 FOR WATERFORD 3

DISTRIBUTION

Docket File 50-382

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