

Docket No.: 50-382

MAR 4 1986

Mr. R. S. Leddick
Senior Vice President - Nuclear Operations
Louisiana Power and Light Company
142 Delaronde Street
New Orleans, Louisiana 70174

Dear Mr. Leddick:

Subject: Issuance of Federal Register Notice - Waterford Steam Electric
Station, Unit 3

Enclosed for your information is a copy of the Notice of Consideration of Issuance of Amendment to Facility Operating License and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to your application, dated February 19, 1986, as supplemented by letters dated February 27, 1986 and March 4, 1986, for Technical Specification changes to (1) modify the surveillance requirements for the emergency diesel generators and (2) extend the interval for Type B and C containment leakage rate testing to the first refueling outage. This Notice has been forwarded to the Office of the Federal Register for publication.

Sincerely,

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James H. Wilson, Project Manager
PWR Project Directorate No. 7
Division of PWR Licensing-B

Enclosure:
As stated

cc: See next page

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UNITED STATES NUCLEAR REGULATORY COMMISSIONLOUISIANA POWER AND LIGHT COMPANYDOCKET NO. 50-382NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENT TO
FACILITY OPERATING LICENSE AND PROPOSED NO SIGNIFICANT HAZARDS
CONSIDERATION DETERMINATION AND OPPORTUNITY FOR HEARING

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to Facility Operating License No. NPF-38 issued to Louisiana Power Light Company (the licensee), for operation of the Waterford Steam Electric Station, Unit 3, located in St. Charles Parish, Louisiana.

The amendment would revise the Appendix A Technical Specifications in accordance with the licensee's application for amendment dated February 19, 1986, as supplemented by letters dated February 27, 1986 and March 4, 1986, (1) by modifying the surveillance requirements for the emergency diesel generators and (2) by extending the interval for Type B and C containment leakage rate testing to the first refueling outage.

(1) Emergency Diesel Generator Surveillance

Surveillance Requirement 4.8.1.1.2.d.1 specifies that "at least once per 18 months during shutdown" the emergency diesel generators will be subjected "to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service." The proposed change will modify the surveillance interval by specifying that the inspection be performed during refueling outages.

The Standard Review Plan and the Technical Specification Bases cite various Regulatory Guides as the basis for operability demonstration of the diesel

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generators. Functional testing is primarily addressed by Regulatory Guide 1.108, Periodic Testing of Diesel Generator Units as Onsite Electric Power Systems at Nuclear Power Plants. This Regulatory Guide discusses most of the testing requirements of Surveillance Requirements 4.8.1.1.2.d.2-13. However, the Regulatory Guide, the Standard Review Plan and the Waterford 3 Technical Specification Bases are silent on the subject of diesel generator inspection as described in Surveillance Requirement 4.8.1.1.2.d.1. In satisfying Surveillance Requirements 4.8.1.1.2.d.2-13, the operability of the diesel generators is demonstrated.

LP&L recently retained the services of the diesel manufacturer, Cooper-Bessemer, to perform on-line diagnostic analyses of the diesel generator operation. Cooper-Bessemer determined that no significant deficiencies were present and that those areas identified as recommendations would not adversely affect the operation of the diesel generators. Further, Cooper-Bessemer recommended that a refueling cycle interval is adequate for inspection purposes. Although Surveillance Requirement 4.8.1.1.2.d.1 appears to allow flexibility with respect to manufacturer's recommendations (i.e. perform inspections, "in accordance with...manufacturer's recommendations"), this change will make explicit the manufacturer's recommendation that inspections be performed at refueling outages.

LP&L will utilize the EN-SPEC 2000 Engine Analyzer to perform periodic diagnostic testing on the diesel generators. The 2000 Engine Analyzer is a multi-purpose test instrument designed to evaluate the performance of reciprocating engines and compressors. By comparing current operational characteristics with previously recorded baseline data, any appreciable

performance degradation should be detected and remedied. Therefore, based on the Cooper-Bessemer results and planned preventive maintenance, a full plant outage to satisfy Surveillance Requirement 4.8.1.1.2.d.1 at a time other than refueling is not recommended by the manufacturer as being technically justified and would serve no useful purpose.

The NRC staff proposes to determine that the proposed change does not involve a significant hazards consideration because it meets the three criteria of 10 CFR 50.92(c). The basis for this proposed finding is given below.

- (a) Operation of the facility in accordance with this proposed change does not involve a significant increase in the probability or consequences of an accident previously analysed. The bases for diesel generator operability requirements are contained in the Standard Review Plan, Regulatory Guide 1.108 (among others), and the Technical Specification Bases. Through Surveillance Requirements 4.8.1.1.2.a-c and 4.8.1.1.2.d.2-13, Waterford 3 continues to fully demonstrate operability of the diesel generators. Therefore, the proposed change will not involve a significant increase in the probability or consequences of any accident previously evaluated.
- (b) Operation of the facility in accordance with this proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change introduces no new systems, modes of operation, failure modes or other plant perturbations. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

(c) Operation of the facility in accordance with the proposed amendment does not involve a significant reduction in a margin of safety. Emergency diesel generator operability will continue to be functionally tested in accordance with Surveillance Requirements 4.8.1.1.2a-c and 4.8.1.1.2d.2-13. Functional testing provides an objective demonstration of operability as mandated by the Standard Review Plan.

On the basis that the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of an accident of a type different from any previously evaluated, or (3) involve a significant reduction in a margin of safety, the staff has made an initial determination that the proposed amendment is not likely to involve a significant hazards consideration.

(2) Type B and C Containment Leakage Rate Testing

Surveillance Requirement 4.6.1.2.d states that Type B and C containment leakage rate tests shall be conducted at intervals no greater than 24 months. Surveillance Requirement 4.6.1.2.f requires, in part, that the bypass leakage rate be determined through Type B and C testing at least once per 24 months. The proposed change would allow for an extension of the above Type B and C testing interval to the refueling outage for the first cycle of operation only.

LP&L successfully completed the pre-operational Type A integrated leak rate testing (ILRT) on May 1, 1983, and Type B and C local leak rate testing (LLRT) on April 22, 1984. The results of the ILRT results were submitted to the NRC in a letter dated July 19, 1983. The LLRT results demonstrated a low level of leakage. Against the allowable Technical Specification leakage

limit of 630,697 cc/day, testing revealed an actual leakage of 15,952 cc/day. The current leakage is 21,547 cc/day, a minor increase. Similar results were obtained for the bypass leakage - against an allowable limit of 63,069 cc/day, bypass leakage was demonstrated to be 5,490 cc/day, with a current leakage of 6,150 cc/day. (Note: The Technical Specifications use the term L_a to define allowable leakage. L_a (in %/24 hours) is the maximum allowable leakage rate at peak containment DBA pressure. In the Technical Specifications, $0.60L_a$ corresponds to 630,697 cc/day and $0.06L_a$ corresponds to 63,069 cc/day.)

The performance of the pre-operational ILRT/LLRT testing was scheduled to be consistent with what appeared, at the time, to be a reasonable fuel load date. The intent of the scheduling was to allow adequate time for the first cycle of operation so as to satisfy the 24 month Type B and C testing requirements of Surveillance Requirements 4.6.1.2.d/f at the first refueling outage. Due to various factors, the full power licensing of Waterford 3 was delayed to March 16, 1985 and commercial operation of the facility was declared in September 1985. Therefore, absent the proposed change, LP&L would be faced with an extended mid-cycle outage in order to perform the Type B and C testing.

Containment leakage rate is primarily affected by equipment wear and maintenance. During periods of inactivity little, if any, increase in leakage rate would be expected. From the time of performance of the ILRT/LLRT testing to receipt of the low power operating license in December 1984 (a period of approximately 8 months), LP&L was primarily occupied with addressing licensing issues rather than exercising plant systems.

Thus, B Type and C equipment was subject to only minimal wear during that time.

To determine the effect on Type B and C equipment due to maintenance, LP&L has conducted a review of the LLRT logbook. This review has determined that maintenance was performed on only a few components out of a total of 117 and that in these cases acceptable Type B testing was performed post-maintenance.

Given the low burden placed on Type B and C components during a significant portion of the time since ILRT/LLRT testing, and the low level of maintenance on these components, it would be expected that increases in the containment and bypass leakage rates would be minor. This is borne out by Waterford 3's history of minor problems with containment pressure control. With a fairly tight Technical Specification on containment pressure, 14.9-15.4 psia depending on containment temperature, LP&L has found it necessary to frequently "burp" containment to maintain pressure at an acceptable level. Presently, pressure control is required every one to two days.

The containment air locks and the containment purge system (supply and exhaust) are systems exercised on fairly frequent basis and provide potential leakage paths. However, operability and leak testing of these systems are required separately through Technical Specifications 3.6.1.3 and 3.6.1.7, respectively. The proposed change has no effect on the leakage rate testing of the air locks and containment purge system.

Precedents for the proposed change exist. For example, on September 26, 1985 in response to an August 26, 1985 request, the NRC granted an exemption to Appendix J to allow Dresden Unit 3 to continue operation to their scheduled refueling. The request was primarily based on the presence of a four-month outage during which leak-sensitive components were not exercised. The proposed change for Waterford 3 will realign the scheduling to be consistent with the

first refueling outage, which is anticipated to start between December 15, 1986 and March 1, 1987.

In summary, the proposed change is supported by:

- The large margin to Technical Specification limits demonstrated during the pre-operational LLRT.
- The low component usage factor prior to low power licensing.
- The minimal component maintenance and successful post-maintenance testing of a minor number of components.
- The continued leakage rate testing of the air locks and containment purge system, as already required.
- Granting of similar requests to other operating nuclear plants.
- The intent of Standard Technical Specifications to require LLRT only at refueling intervals, as long as refueling takes place within a reasonable period of time.

The NRC staff proposes to determine that the proposed change does not involve a significant hazards consideration because it meets the criteria of 10 CFR 50.92(c). The basis for this proposed finding is given below.

- (a) Operation of the facility in accordance with the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The FSAR Chapter 15 safety analyses assume the maximum allowable Technical Specification leakage in calculating off-site dose consequences. As stated above, the current leakage rate is estimated to be about 4% of the leakage rate allowed by the technical specifications. This low estimate for current actual leakage confirms the expectation that leakage would be low based on the low component usage factor in the first 8 months

since the last tests were performed and the limited amount of component maintenance that has been required to date.

- (b) Operation of the facility in accordance with this proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed. Specifically, the proposed change introduces no new systems, modes of operation, failure modes or other plant perturbations. The change is schedular in nature and for one-time only, as all required valve and penetration testing will be conducted at the first refueling outage. Taking credit for the low component usage factor between previous leak rate testing and plant licensing will align the leakage rate testing with the first refueling outage. Leakage rate testing will then be conducted at subsequent refueling outages which will occur at 18-month intervals, well within the 24 months allowable. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.
- (c) Operation of the facility in accordance with this proposed amendment does not involve a significant reduction in a margin of safety. Specifically, estimates of current local leakage rate are about 4% of the leakage rate allowed by the technical specifications. The actual period of plant operation is well within the two-year period originally intended by the technical specifications. Current plant performance indicates little, if any, degradation in containment leakage. The low level of required maintenance and successful post-maintenance testing,

combined with the performance of leakage rate testing during the remainder of Cycle 1, provide adequate assurance that any reduction in safety margin is minimal. Therefore, the proposed change will not involve a significant reduction in a margin of safety.

On the basis that the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of an accident of a type different from any previously evaluated, or (3) involve a significant reduction in a margin of safety, the staff has made an initial determination that the proposed amendment is not likely to involve a significant hazards consideration.

The Commission is seeking public comments on this proposed determination. Any comments received within 30 days after the date of publication of this notice will be considered in making any final determination. The Commission will not normally make a final determination unless it receives a request for a hearing.

Comments should be addressed to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attn: Rules and Procedures Branch, Office of Administration.

Service Branch.

By April 9, 1986, the licensee may file a request for a hearing with respect to issuance of the amendment to the subject facility operating license and any person whose interest may be affected by this proceeding and who wishes to participate as a party in the proceeding must file a written petition for leave to intervene. Request for a hearing and petitions for leave to intervene shall be filed in accordance with the Commission's "Rules of Practice for

Domestic Licensing Proceedings" in 10 CFR Part 2. If a request for a hearing or petition for leave to intervene is filed by the above date, the Commission or an Atomic Safety and Licensing Board, designated by the Commission or by the Chairman of the Atomic Safety and Licensing Board Panel, will rule on the request and/or petition and the Secretary or the designated Atomic Safety and Licensing Board will issue a notice of hearing or an appropriate order.

As required by 10 CFR §2.714, a petition for leave to intervene shall set forth with particularity the interest of the petitioner in the proceeding, and how that interest may be affected by the results of the proceeding. The petition should specifically explain the reasons why intervention should be permitted with particular reference to the following factors: (1) the nature of the petitioner's right under the Act to be made a party to the proceeding; (2) the nature and extent of the petitioner's property, financial, or other interest in the proceeding; and (3) the possible effect of any order which may be entered in the proceeding on the petitioner's interest. The petition should also identify the specific aspect(s) of the subject matter of the proceeding as to which petitioner wishes to intervene. Any person who has filed a petition for leave to intervene or who has been admitted as a party may amend the petition without requesting leave of the Board up to fifteen (15) days prior to the first prehearing conference scheduled in the proceeding, but such an amended petition must satisfy the specificity requirements described above.

Not later than (15) days prior to the first prehearing conference scheduled in the proceeding, a petitioner shall file a supplement to the

petition to intervene which must include a list of the contentions which are sought to be litigated in the matter, and the bases for each contention set forth with reasonable specificity. Contentions shall be limited to matters within the scope of the amendment under consideration. A petitioner who fails to file such a supplement which satisfies these requirements with respect to at least one contention will not be permitted to participate as a party.

Those permitted to intervene become parties to the proceeding, subject to any limitations in the order granting leave to intervene, and have the opportunity to participate fully in the conduct of the hearing, including the opportunity to present evidence and cross-examine witnesses.

If a hearing is requested, the Commission will make final determination on the issue of no significant hazards consideration. The final determination will serve to decide when the hearing is held.

If the final determination is that the amendment request involves no significant hazards consideration, the Commission may issue the amendment and make it effective, notwithstanding the request for a hearing. Any hearing held would take place after issuance of the amendment.

Normally, the Commission will not issue the amendment until the expiration of the 30-day notice period. However, should circumstances change during the notice period such that failure to act in a timely way would result, for example, in derating or shutdown of the facility, the Commission may issue the license amendment before the expiration of the 30-day notice period, provided that its final determination is that the amendment involves no significant hazards consideration. The final determination will consider all

public and State comments received. Should the Commission take this action, it will publish a notice of issuance and provide for opportunity for a hearing after issuance. The Commission expects that the need to take this action will occur very infrequently.

A request for a hearing or a petition for leave to intervene must be filed with the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Rules and Procedures Branch, Office of Administration, or may be delivered to the Commission's Public Document Room, 1717 H Street, N.W. Washington, D.C., by the above date. Where petitions are filed during the last ten (10) days of the notice period, it is requested that the petitioner promptly so inform the Commission by a toll-free telephone call to Western Union at (800) 325-6000 (in Missouri (800) 342-6700). The Western Union operator should be given Datagram Identification Number 3737 and the following message addressed to George W. Knighton: petitioner's name and telephone number; date petition was mailed; plant name; and publication date and page number of this FEDERAL REGISTER notice. A copy of the petition should also be sent to the Executive Legal Director, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, and to Bruce W. Churchill, Esq., Shaw, Pittman, Potts and Trowbridge, 1800 M Street, N.W., Washington, D.C. 20036.

Nontimely filings of petitions for leave to intervene, amended petitions, supplemental petitions and/or requests for hearing will not be entertained absent a determination by the Commission, the presiding officer or the presiding Atomic Safety and Licensing Board, that the petitioner and/or request should be granted based upon a balancing of the factors specified in CFR 10 2.714 (a)(1)(i)-(v) and 2.7714(d).

For further details with respect to this action, see the application for amendment which is available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., and at the University of New Orleans Library, Louisiana Collection, Lakefront, New Orleans 70122.

Dated at Bethesda, Maryland, this 4th day of March, 1986.

FOR THE NUCLEAR REGULATORY COMMISSION


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

For further details with respect to this action, see the application for amendment which is available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., and at the University of New Orleans Library, Louisiana Collection, Lakefront, New Orleans 70122.

Dated at Bethesda, Maryland, this 4th day of March 1986.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by:
George W. Knighton

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

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