April 07, 1986

Docket No.: 50-382

Mr. R. S. Leddick
Senior Vice President - Nuclear Operations
Louisiana Power and Light Company
317 Baronne St., Mail Unit 17
New Orleans, Louisiana 70160

Dear Mr. Leddick:

SUBJECT: SCHEDULAR EXEMPTION FROM REQUIREMENTS OF APPENDIX J TO 10 CFR PART 50, SECTION III.D.2 AND III.D.3

The Commission has issued an exemption to certain requirements of Appendix J to 10 CFR Part 50 in response to your letter dated February 27, 1986. The schedular exemption pertains to certain requirements of Appendix J to 10 CFR Part 50 for Type B and C testing for 65 components which maintain containment integrity at design basis accident conditions.

In your letter dated February 19, 1986, as supplemented by letter dated February 27, 1986, you requested a schedular exemption for local leak rate testing of 65 components from April 22, 1986, until the first refueling outage for Waterford 3. The Commission has granted a schedular exemption for testing these components from April 22, 1986, until the startup after the first refueling outage.

The Commission grants this exemption on a one-time basis only. The bases for this action are included in the enclosed Exemption.

The Exemption is being 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

AS MARKED

PBD7	PBD7	D:PBD7	PEICSB	AD:PWRL-B
JLee	JWilson/es	GWKnighton	OParr	DCrutchfield
3/24/86	3/21/86	4/1/86	3/25/86	3/27/86

OELD	D:PWRL-B	NRR	NRR
J. Shedlosky	FSMiraglia	DEisenhut	HDenton
3/03/86	3/ /86	3/ /86	3/ /86

04

cc:
W. Malcolm Stevenson, Esq.
Monroe & Leman
1432 Whitney Building
New Orleans, Louisiana 70103

Mr. E. Blake
Shaw, Pittman, Potts and Trowbridge
1800 M Street, NW
Washington, D.C. 20036

Mr. Gary L. Groesch
P. O. Box 791169
New Orleans, Louisiana 70179-1169

Mr. F. J. Drummond
Project Manager - Nuclear
Louisiana Power and Light Company
142 Delaronde Street
New Orleans, Louisiana 70174

Mr. K. W. Cook
Nuclear Support and Licensing Manager
Louisiana Power and Light Company
142 Delaronde Street
New Orleans, Louisiana 70174

Resident Inspector/Waterford NPS
P. O. Box 822
Killona, Louisiana 70066

Mr. Jack Fager
Middle South Services, Inc.
P. O. Box 61000
New Orleans, Louisiana 70161

Chairman
Louisiana Public Service Commission
One American Place, Suite 1630
Baton Rouge, Louisiana 70804

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Office of Executive Director
for Operations
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Carole H. Burstein, Esq.
445 Walnut Street
New Orleans, Louisiana 70118

Mr. Charles B. Brinkman, Manager
Washington Nuclear Operations
Combustion Engineering, Inc.
7910 Woodmont Avenue, Suite 1310
Bethesda, Maryland 20814

Mr. William H. Spell, Administrator
Nuclear Energy Division
Office of Environmental Affairs
P. O. Box 14690
Baton Route, Louisiana 70898

President, Police Jury
St. Charles Parrish
Hahnville, Louisiana 70057

April 07, 1986

Waterford Exemption

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W. Jones
ACRS (10)
OPA
SECY
LFMB

In the Matter of)
)
LOUISIANA POWER & LIGHT COMPANY) Docket No. 50-382
)
(Waterford Steam Electric)
Station Unit No. 3))

EXEMPTION

I.

Louisiana Power & Light (LP&L) Company (the licensee) holds Facility Operating License No. NPF-38, which authorizes operation of the Waterford Steam Electric Station, Unit No. 3 (the facility) at core power levels not to exceed of 3390 megawatts thermal. This license provides, among other things, that the facility is subject to all rules, regulations, and Orders of the Nuclear Regulatory Commission (the Commission) now or hereafter in effect.

The facility is a pressurized water reactor located at the licensee's site in St. Charles Parish, Louisiana.

II.

Appendix J of 10 CFR Part 50, Sections III.D.2 and III.D.3 require that Type B and C tests shall be performed during each reactor shutdown for refueling but in no case at intervals greater than two years. Section II.G of 10 CFR Part 50, Appendix J, defines "Type B Tests" as tests intended to measure leakage rates for certain defined containment penetrations. Section II.H of 10 CFR Part 50, Appendix J, defines "Type C Tests" as tests intended to measure containment isolation valve leakage rates. These penetrations and valves help maintain containment integrity at design basis accident conditions.

III.

By letter dated February 19, 1986, as supplemented by letter dated February 27, 1986, the licensee requested an exemption from the schedular requirements of 10 CFR Part 50, Appendix J, Sections III.D.2. and III.D.3. Specifically, 65 components are due for Type B and C testing beginning April 22, 1986. In order to test these 65 components, the plant must be in a cold shutdown condition. The licensee proposes to postpone leak testing of these components until the next scheduled refueling outage.

The previous Type B and C testing for Waterford 3 was completed April 22, 1984. Until receipt of the low-power operating license on December 18, 1984, the plant was in a cold shutdown condition. In the summer of 1985, prior to completion of the power ascension testing, Waterford 3 was in cold shutdown for approximately 2 months for turbine repairs.

The licensee has leak tested all valves consistent with personnel safety. However, there are 65 components which require the plant to be in a cold shutdown condition before testing can be accomplished. To require the plant to shut down solely to leak test these components by April 22, 1986, would cause an unnecessary thermal transient on the plant and result in unnecessary exposure to workers.

Waterford 3 is a new plant with little service life on its Type B and C components. During the April 1984 leak rate tests, leakage paths were identified and necessary repairs were satisfactorily performed. The local leakage rate tests conducted in 1984 showed that the actual leakage was less than 10% of the allowable limit which indicates that the valves were in good

condition. Based on these test results, the valves are predicted to remain within acceptable leakage limits throughout the time interval extension requested. Containment test requirements per Appendix J to 10 CFR 50 provide for preoperational tests and periodic verification by tests of the leak-tight integrity of the primary reactor containment and systems and components which penetrate containment. The purpose of the tests is to assure that (a) leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the technical specifications or associated bases and (b) periodic surveillance of reactor containment penetrations and isolation valves will be performed so that proper maintenance and repairs are made during the service life of the containment and systems and components penetrating primary containment. The regulations specify a maximum of a two-year interval between Type B and C tests to define a general periodicity to satisify the above objectives. Circumstances factored into the two-year interval include the assumption that a normal plant will be fully operational and hot for most of the time interval.

The licensee will meet the schedular requirement for all but a maximum of 65 components. However, for these 65 components, the short service life of the components and the local leakage rate tests conducted during April 1984, with the accompanying valve surveillance and maintenance as documented in the tests, provide sufficient evidence to conclude that with the few months delay in testing, (a) leakage through the components will not exceed allowable values before the next test and (b) sufficient maintenance and repairs have been made over the service life of the components to insure their integrity until the next test. Thus, we conclude that the underlying purpose of the

rule, i.e., to require local leakage rate testing at periodic intervals of certain types of containment penetrations and isolation valves to determine whether there has been degradation in the leakage characteristics of these components which might adversely affect containment integrity, will be satisfied even with the delay in testing.

Based on the above discussion, the licensee's proposed extension for the Type B and C testing of 65 components until startup after the first refueling outage (to begin in the first quarter of 1987), is acceptable. This is a one-time only schedular exemption from the requirements of 10 CFR 50, Appendix J, Section III.D.2. and III.D.3.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12, this exemption is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security. The Commission further determines that special circumstances, as provided in 10 CFR 50.12(a)(2)(ii), are present justifying the exemption, namely that application of the regulation in this particular circumstance is not necessary to achieve the underlying purpose of the rule - to require local leak rate testing at periodic intervals of certain types of containment penetrations and isolation valves to determine whether there has been degradation in the leakage characteristics of these components which might adversely affect containment integrity. Specifically, as noted above, the short service life of the components, and the latest local leakage rate test results which showed actual leakage less than 10% of the allowable limit, leads the staff to conclude that

requiring the plant to shut down solely to test the remaining valves by April 22, 1986, is not necessary to assure the continuing maintenance of containment integrity. Accordingly, the Commission hereby grants an exemption as described in Section III above from Sections III.D.2. and III.D.3. of Appendix J to 10 CFR Part 50 to the extent that the two-year interval for performing Type B and C tests on 65 components may be extended, on a one-time basis only, for Waterford 3 until the startup after the first refueling outage scheduled to begin in the first quarter of 1987.

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this Exemption will have no significant impact on the environment (March 27, 1986, 51 FR 10590).

This Exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Frank J. Miraglia

Frank J. Miraglia, Director
Division of PWR Licensing-B

Dated at Bethesda, Maryland
this 7th day of April, 1986.