



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

MAR 16 1985

MEMORANDUM FOR: Sholly Coordinator
Office of Nuclear Reactor Regulation

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

SUBJECT: REQUEST FOR PUBLICATION IN BI-WEEKLY FR NOTICE - NOTICE OF
CONSIDERATION OF ISSUANCE OF AMENDMENT TO FACILITY
OPERATING LICENSE AND PROPOSED NO SIGNIFICANT HAZARDS
CONSIDERATION DETERMINATION AND OPPORTUNITY FOR HEARING

Louisiana Power and Light Company, Docket No. 50-382, Waterford Steam Electric
Station, Unit 3, St. Charles Parish, Louisiana.

Date of amendment request: February 23, 1987

Description of Amendment Request: The proposed change would revise the note to Technical Specification 3.5.1, "Safety Injection Tanks". As presently written, the note is applicable in Modes 3 and 4 and currently allows the safety injection tank (SIT) level to be decreased to between 60% and 83.8% level when pressurizer pressure has been decreased to less than 1750 psia and only three SITs are operable. This lower level of 60% corresponds to the minimum required water volume of 1332 cubic feet that must be maintained in each of the three operable SITs; however, calculations have shown that, in order to maintain the required water volume of 1332 cubic feet, the SIT level must be 60.23%. The proposed change, therefore, would conservatively "round-up" the required level to 61% instead of "round-off" to 60%.

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Basis for Proposed No Significant Hazards Considerations Determination:

The NRC staff proposes that the proposed change does not involve a significant hazards consideration because, as required by the criteria of 10 CFR 50.92(c), operation of the facility in accordance with the proposed amendment would not: (1) Involve a significant increase in the probability of a new or different kind of accident from any accident previously evaluated; or (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Involve a significant reduction in the margin of safety. The basis for this proposed finding is given below.

- (1) The proposed change to this Technical Specification does not affect the manner in which the plant is operated. The change is being proposed to correct a potential non-conservatism in the percent level that corresponds to the minimum required volume that must be maintained in the SITs. The reason for maintaining a minimum volume is to ensure that, in the event of a large break loss-of-coolant accident (LOCA), the amount of water injected into the RCS from the SITs is consistent with the amount of water assumed in the large break LOCA analysis presented in the FSAR. Since the proposed change increases the required level that must be maintained in the SIT (and hence increases the required volume), there will be no effect on the LOCA analyses described in

Chapters 6 and 15 of the FSAR. Therefore, the proposed change will not involve a significant increase in the probability of consequences of any accident.

- (2) The proposed change will ensure that the level of the SITs is consistent with the volume requirement that was determined by the Safety Analysis. There has been no physical change to plant systems, structures or components. The only change to plant procedures will be to require an increased SIT level when performing routine surveillance tests. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.
- (3) The intent of these specifications is to ensure that a sufficient volume of borated water will be immediately forced into the reactor core through each of the four cold legs in the event that the RCS pressure falls below the pressure of the safety injection tanks. This initial surge of water into the core provides the initial cooling mechanism during the large break LOCA analysis. The minimum SIT volume requirement ensures there is sufficient water in each of the SITs to perform the function assumed in the safety analysis. Since the proposed change simply updates the SIT level that corresponds to the minimum volume requirement, it will not involve a significant reduction in the margin of safety.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (51 FR 7751) of amendments that are considered not likely to involve significant hazards consideration. Example (ii) relates to a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications, (e.g. a more stringent surveillance requirement). In this case, the proposed change is similar to Example (ii) in that it requires the SITs to be maintained at an increased level.

The staff has reviewed the licensee's no significant hazards consideration analysis. Based on the review and the above discussions, the staff proposes to determine that the proposed changes do not involve a significant hazards consideration.

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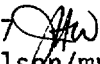
NRC Project Director: George W. Knighton


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