



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

MAR 16 1987⁷

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 Technical Specifications 3.1.2.8b.1, "Borated Water Sources - Operating" and 3.5.4a, "Refueling Water Storage Pool". Currently, the Technical Specifications require that the Refueling Water Storage Pool (RWSP) contain a minimum water volume of 475,000 gallons. The technical specifications refer to 82% as being equal to the required volume; however, calculations have shown that, in order to maintain the required 475,000 gallons in the RWSP, the indicated level must be equal to 82.4%. The proposed change, would conservatively "round-up" the required level to 83% instead of "rounding-off" to 82%. This change is being proposed to correct a potential nonconservatism in the percent indicated level that corresponds to the minimum required volume that must be maintained.

Basis for Proposed No Significant Hazards Considerations Determination:

The NRC staff proposes to determine 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 or consequences of an 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 these Technical Specifications is strictly administrative in nature and does not affect the manner in which the plant is operated. The change is being proposed to correct a potential nonconservatism in the percent indicated level that corresponds to the minimum required volume that must be maintained in the RWSP. The reason for maintaining a minimum volume of borated water in the RWSP is to ensure that the available supply of water to the Emergency Core Cooling System (ECCS) is consistent with the assumptions used in the large break loss of coolant accident (LOCA) presented in the FSAR. Since the proposed change increases the required level that must be maintained in the RWSP (and hence increases the required volume), there will be no affect on the LOCA analysis as described in Chapters 6 and 15 of the FSAR. Therefore, the proposed change will not involve a significant increase in the probability or consequences of any accident.
- (2) The proposed change will ensure the indicated level of the RWSP is consistent with the volume requirement that was determined by the FSAR. There has been no physical change to plant systems,

structures or components. The only change to plant procedures will be to require an increased RWSP 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 supply of borated water is available for injection by ECCS in the event of a LOCA. The minimum RWSP volume requirement ensures that sufficient water will be available inside the containment to permit recirculation through the safety injection pumps and back into the core. This minimum volume requirement also includes an allowance for water not usable because of RWSP discharge line location and other physical characteristics. Since the proposed change simply updates the RWSP level that corresponds to this 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 RWSP to be maintained at an increased level.

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

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Louisiana Collection, Lakefront, New Orleans, Louisiana 70122

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