



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

MAR 16 1987

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 3.3-11, "Fire Detection Instruments" to:

1. Change the two Function A (early warning fire detection and notification only) smoke detectors in the CCW Pump "A" room (Zone RAB19) to Function B (actuation of fire suppression systems and early warning and notification) instruments, and
2. Implement certain name changes and correct typographical errors for the charcoal air filter units.

Presently, Technical Specification Table 3.3-11 indicates the presence of two smoke detectors in Fire Zone RAB19 which provide early warning fire detection and notification but do not actuate fire suppression systems. As part of the Associated Circuits Analysis modifications implemented during the first refueling outage for Waterford 3, an existing pre-action sprinkler system was extended into RAB19. Local control panel modifications allowed the use of existing early warning notification smoke detectors to also

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provide suppression system actuation. The proposed change will revise the RAB19 smoke detector designation from Function A to Function B to reflect the additional detector capability.

The proposed changes to Table 3.3-11 for the charcoal air filter units will correct typographical errors in filter train identification numbers and revise room name descriptions to be consistent with Waterford 3 standard usage. These changes are purely administrative.

Basis for Proposed No Significant Hazards Considerations Determination:

The NRC staff proposes that the proposed changes do 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 RAB19 smoke detectors provides increased fire suppression capability. As such, the probability of damage to redundant safe shutdown components passing through RAB19 is decreased and the potential consequences of a fire in that area are reduced from that existing during Cycle 1. The administrative changes to the charcoal air filter unit designations have no physical effect on plant systems. Thus, the proposed changes will not involve a significant

increase in the probability or consequences of any accident previously evaluated.

- (2) The proposed changes will either enhance fire suppression capability or introduce no physical changes to the plant. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.
- (3) The RAB19 smoke detectors will provide an increased margin of safety over that available during Cycle 1 due to the additional suppression capability. The administrative changes to the charcoal filter units will introduce no plant changes and therefore will not affect safety margins.

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 (i) relates to a purely administrative change (e.g., a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature). 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 changes to the charcoal air filter units are similar to Example (i) in that numbering errors are being corrected and nomenclature changed to be consistent with Waterford 3 usage. The RAB19 proposed change is similar to Example (ii) in placing an additional restriction (suppression system actuation) on the smoke detectors.

The staff has reviewed the licensee's no significant hazards consideration analysis. Based on the review and above discussion, 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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