

March 30, 1988

Docket No. 50-382

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Mr. J. G. Dewease
Senior Vice President - Nuclear Operations
Louisiana Power and Light Company
317 Baronne Street, Mail Unit 17
New Orleans, Louisiana 70112

Dear Mr. Dewease:

SUBJECT: ISSUANCE OF AMENDMENT NO. 34 TO FACILITY OPERATING LICENSE
NPF-38 - WATERFORD STEAM ELECTRIC STATION, UNIT 3
(TAC NO. 66291)

The Commission has issued the enclosed Amendment No. 34 to Facility Operating License No. NPF-38 for the Waterford Steam Electric Station, Unit 3. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated December 10, 1987.

The amendment changes the Appendix A Technical Specifications by adding the requirement for having two emergency core cooling system subsystems operable when the reactor coolant system average temperature is greater than or equal to 500°F.

A copy of the Safety Evaluation supporting the amendment is also enclosed. Notice of Issuance will be included in the Commission's next Bi-weekly Federal Register notice.

Sincerely,

/s/

David L. Wigginton, Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 34 to NPF-38
2. Safety Evaluation

cc w/enclosures:
See next page

PD4/LA
PNoonan
01/15/88

PD4/PM
JWilson
DWigginton:sr
01/19/88

SRXB
WHodges
01/20/88

*checked issuance
OGC check state of SEC Y
before issuance*
MYoung
01/22/88

PD4/D
JCalvo
01/1/88
03/30/88

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P PDR



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

March 30, 1988

Docket No. 50-382

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Senior Vice President - Nuclear Operations
Louisiana Power and Light Company
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Sincerely,

A handwritten signature in dark ink, appearing to read "D. Wigginton".

David L. Wigginton, Project Manager
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

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Office of Nuclear Reactor Regulation

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2. Safety Evaluation

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PD4/LA
PNoonan
01/15/88

PD4/PM
JWilson
DWigginton: sr
01/19/88

SRXB
WHodges
01/20/88

*of noted memo
check state of SECY
OGC before issuance
MYoung
01/22/88*

PD4/D
JCalvo
01/1/88
03/30/88

Mr. Jerrold G. Dewease
Louisiana Power & Light Company

Waterford 3

cc:

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Monroe & Leman
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Louisiana Power & Light Company
317 Baronne Street
New Orleans, Louisiana 70112



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

LOUISIANA POWER AND LIGHT COMPANY

DOCKET NO. 50-382

WATERFORD STEAM ELECTRIC STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 34
License No. NPF-38

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Louisiana Power and Light Company (the licensee) dated December 10, 1987, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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P PDR

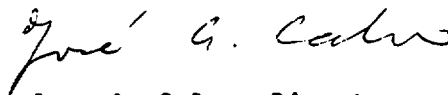
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-38 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 34 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Jose A. Calvo, Director
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 30, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 34
TO FACILITY OPERATING LICENSE NO. NPF-38
DOCKET NO. 50-382

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

<u>Remove</u>	<u>Insert</u>
IV	IV
3/4 5-3	3/4 5-3
3/4 5-8	3/4 5-8
B 3/4 5-1	B 3/4 5-1

INDEX

LIMITING CONDITION FOR OPERATION AND SURVEILLANCE REQUIREMENTS

<u>SECTION</u>	<u>PAGE</u>
<u>3/4.2 POWER DISTRIBUTION LIMITS</u>	
3/4.2.1 LINEAR HEAT RATE.....	3/4 2-1
3/4.2.2 PLANAR RADIAL PEAKING FACTORS.....	3/4 2-3
3/4.2.3 AZIMUTHAL POWER TILT.....	3/4 2-4
3/4.2.4 DNBR MARGIN.....	3/4 2-6
3/4.2.5 RCS FLOW RATE.....	3/4 2-10
3/4.2.6 REACTOR COOLANT COLD LEG TEMPERATURE.....	3/4 2-11
3/4.2.7 AXIAL SHAPE INDEX.....	3/4 2-12
3/4.2.8 PRESSURIZER PRESSURE.....	3/4 2-13
<u>3/4.3 INSTRUMENTATION</u>	
3/4.3.1 REACTOR PROTECTIVE INSTRUMENTATION.....	3/4 3-1
3/4.3.2 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION.....	3/4 3-13
3/4.3.3 MONITORING INSTRUMENTATION	
RADIATION MONITORING INSTRUMENTATION.....	3/4 3-28
INCORE DETECTORS.....	3/4 3-34
SEISMIC INSTRUMENTATION.....	3/4 3-35
METEOROLOGICAL INSTRUMENTATION.....	3/4 3-38
REMOTE SHUTDOWN INSTRUMENTATION.....	3/4 3-41
ACCIDENT MONITORING INSTRUMENTATION.....	3/4 3-44
CHEMICAL DETECTION SYSTEMS.....	3/4 3-47
FIRE DETECTION INSTRUMENTATION.....	3/4 3-49
LOOSE-PART DETECTION INSTRUMENTATION.....	3/4 3-54
RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION.....	3/4 3-55
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION.....	3/4 3-60
3/4.3.4 TURBINE OVERSPEED PROTECTION.....	3/4 3-68

INDEX

LIMITING CONDITION FOR OPERATION AND SURVEILLANCE REQUIREMENTS

<u>SECTION</u>	<u>PAGE</u>
<u>3/4.4 REACTOR COOLANT SYSTEM</u>	
3/4.4.1 REACTOR COOLANT LOOPS AND COOLANT CIRCULATION	
STARTUP AND POWER OPERATION.....	3/4 4-1
HOT STANDBY.....	3/4 4-2
HOT SHUTDOWN.....	3/4 4-3
COLD SHUTDOWN - LOOPS FILLED.....	3/4 4-5
COLD SHUTDOWN - LOOPS NOT FILLED.....	3/4 4-6
3/4.4.2 SAFETY VALVES	
SHUTDOWN.....	3/4 4-7
OPERATING.....	3/4 4-8
3/4.4.3 PRESSURIZER	
PRESSURIZER.....	3/4 4-9
AUXILIARY.....	3/4 4-9a
3/4.4.4 STEAM GENERATORS.....	3/4 4-10
3/4.4.5 REACTOR COOLANT SYSTEM LEAKAGE	
LEAKAGE DETECTION SYSTEMS.....	3/4 4-17
OPERATIONAL LEAKAGE.....	3/4 4-18
3/4.4.6 CHEMISTRY.....	3/4 4-21
3/4.4.7 SPECIFIC ACTIVITY.....	3/4 4-24
3/4.4.8 PRESSURE/TEMPERATURE LIMITS	
REACTOR COOLANT SYSTEM.....	3/4 4-28
PRESSURIZER HEATUP/COOLDOWN.....	3/4 4-33
OVERPRESSURE PROTECTION SYSTEMS.....	3/4 4-34
3/4.4.9 STRUCTURAL INTEGRITY.....	3/4 4-36
3/4.4.10 REACTOR COOLANT SYSTEM VENTS.....	3/4 4-37
<u>3/4.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)</u>	
3/4.5.1 SAFETY INJECTION TANKS.....	3/4 5-1
3/4.5.2 ECCS SUBSYSTEMS - Modes 1, 2, and 3	3/4 5-3
3/4.5.3 ECCS SUBSYSTEMS - Modes 3 and 4	3/4 5-8
3/4.5.4 REFUELING WATER STORAGE POOL.....	3/4 5-9

3/4.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

BASES

3/4.5.1 SAFETY INJECTION TANKS

The OPERABILITY of each of the Reactor Coolant System (RCS) safety injection tanks ensures that a sufficient volume of borated water will be immediately forced into the reactor core through each of the cold legs in the event 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 large RCS pipe ruptures.

The limits on safety injection tank volume, boron concentration, and pressure ensure that the assumptions used for safety injection tank injection in the safety analysis are met.

The safety injection tank power operated isolation valves are considered to be "operating bypasses" in the context of IEEE Std. 279-1971, which requires that bypasses of a protective function be removed automatically whenever permissive conditions are not met. In addition, as these safety injection tank isolation valves fail to meet single failure criteria, removal of power to the valves is required.

The limits for operation with a safety injection tank inoperable for any reason except an isolation valve closed minimizes the time exposure of the plant to a LOCA event occurring concurrent with failure of an additional safety injection tank which may result in unacceptable peak cladding temperatures. If a closed isolation valve cannot be immediately opened, the full capability of one safety injection tank is not available and prompt action is required to place the reactor in a mode where this capability is not required.

3/4.5.2 and 3/4.5.3 ECCS SUBSYSTEMS

The OPERABILITY of two separate and independent ECCS subsystems ensures that sufficient emergency core cooling capability will be available in the event of a LOCA assuming the loss of one subsystem through any single failure consideration. Either subsystem operating in conjunction with the safety injection tanks is capable of supplying sufficient core cooling to limit the peak cladding temperatures within acceptable limits for all postulated break sizes ranging from the double-ended break of the largest RCS cold leg pipe downward. In addition, each ECCS subsystem provides long-term core cooling capability in the recirculation mode during the accident recovery period.

When in mode 3 and with RCS temperature 500°F two OPERABLE ECCS subsystems are required to ensure sufficient emergency core cooling capability is available to prevent the core from becoming critical during an uncontrolled cooldown (i.e., a steam line break) from greater than 500°F.

EMERGENCY CORE COOLING SYSTEMS

BASES

ECCS SUBSYSTEMS (Continued)

With the RCS temperature below 350°F, one OPERABLE ECCS subsystem is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the limited core cooling requirements.

The trisodium phosphate dodecahydrate (TSP) stored in dissolving baskets located in the containment basement is provided to minimize the possibility of corrosion cracking of certain metal components during operation of the ECCS following a LOCA. The TSP provides this protection by dissolving in the sump water and causing its final pH to be raised to greater than or equal to 7.0.

The Surveillance Requirements provided to ensure OPERABILITY of each component ensure that at a minimum, the assumptions used in the safety analyses are met and that subsystem OPERABILITY is maintained. Surveillance Requirements for throttle valve position stops and flow balance testing provide assurance that proper ECCS flows will be maintained in the event of a LOCA. Maintenance of proper flow resistance and pressure drop in the piping system to each injection point is necessary to: (1) prevent total pump flow from exceeding runout conditions when the system is in its minimum resistance configuration, (2) provide the proper flow split between injection points in accordance with the assumptions used in the ECCS-LOCA analyses, and (3) provide an acceptable level of total ECCS flow to all injection points equal to or above that assumed in the ECCS-LOCA analyses. The requirement to dissolve a representative sample of TSP in a sample of water borated within RWSP boron concentration limits provides assurance that the stored TSP will dissolve in borated water at the postulated post-LOCA temperatures.

The requirement to verify the minimum pump discharge pressure on recirculation flow ensures that the pump performance curve has not degraded below that used to show that the pump exceeds the design flow condition assumed in the safety analysis and is consistent with the requirements of ASME Section XI.

3/4.5.4 REFUELING WATER STORAGE POOL (RWSP)

The OPERABILITY of the refueling water storage pool (RWSP) as part of the ECCS also ensures that a sufficient supply of borated water is available for injection by the ECCS in the event of a LOCA. The limits on RWSP minimum volume and boron concentration ensure that (1) sufficient water is available within containment to permit recirculation cooling flow to the core, and (2) the reactor will remain subcritical in the cold condition following mixing of the RWSP and the RCS water volumes with all CEAs inserted except for the most reactive control assembly. These assumptions are consistent with the LOCA analyses.

EMERGENCY CORE COOLING SYSTEMS

3/4.5.2 ECCS SUBSYSTEMS - MODES 1, 2, AND 3

LIMITING CONDITION FOR OPERATION

3.5.2 Two independent emergency core cooling system (ECCS) subsystems shall be OPERABLE with each subsystem comprised of:

- a. One OPERABLE high-pressure safety injection pump,
- b. One OPERABLE low-pressure safety injection pump, and
- c. An independent OPERABLE flow path capable of taking suction from the refueling water storage pool on a safety injection actuation signal and automatically transferring suction to the safety injection system sump on a recirculation actuation signal.

APPLICABILITY: MODES 1, 2, and 3*#.

ACTION:

- a. With one ECCS subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected safety injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

*With pressurizer pressure greater than or equal to 1750 psia.

#With RCS average temperature greater than or equal to 500°F.

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS

4.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the following valves are in the indicated positions with the valves key-locked shut:

<u>Valve Number</u>	<u>Valve Function</u>	<u>Valve Position</u>
a. 2SI-V1556 (SI-506A)	a. Hot Leg Injection	a. SHUT
b. 2SI-V1557 (SI-502A)	b. Hot Leg Injection	b. SHUT
c. 2SI-V1558 (SI-502B)	c. Hot Leg Injection	c. SHUT
d. 2SI-V1559 (SI-506B)	d. Hot Leg Injection	d. SHUT

- b. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- c. By a visual inspection which verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment which could be transported to the safety injection system sump and cause restriction of the pump suction during LOCA conditions. This visual inspection shall be performed:
1. For all accessible areas of the containment prior to establishing CONTAINMENT INTEGRITY, and
 2. Of the areas affected within containment at the completion of containment entry when CONTAINMENT INTEGRITY is established.
- d. At least once per 18 months by:
1. Verifying automatic isolation and interlock action of the shutdown cooling system from the Reactor Coolant System when the Reactor Coolant System pressure (actual or simulated) is 700 ± 20 psia.

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- i. Each time HPSI Pump A/B is placed in or taken out of service in place of HPSI Pump A or B, the pump being placed in service shall be demonstrated OPERABLE by:
 - 1. Verifying that each valve in the flow path is in its correct position; and
 - 2. Verifying the pump starts manually and upon receipt of a SIAS test signal; and
 - 3. Performing Surveillance Requirement 4.5.2f.1., if not previously accomplished within the required frequency.

- j. Following any maintenance which drains portions of the system, by venting the ECCS pump casings and discharge piping high points.

EMERGENCY CORE COOLING SYSTEMS

3/4.5.3 ECCS SUBSYSTEMS - MODES 3 AND 4

LIMITING CONDITION FOR OPERATION

3.5.3 As a minimum, one ECCS subsystem comprised of the following shall be OPERABLE:

- a. One OPERABLE high pressure safety injection pump, and
- b. An OPERABLE flow path capable of taking suction from the refueling water storage pool on a safety injection actuation signal and automatically transferring suction to the safety injection system sump on a recirculation actuation signal.

APPLICABILITY: MODES 3* and 4.

ACTION:

- a. With no ECCS subsystem OPERABLE, restore at least one ECCS subsystem to OPERABLE status within 1 hour or be in COLD SHUTDOWN within the next 20 hours.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected safety injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

SURVEILLANCE REQUIREMENTS

4.5.3 The ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2.

*With pressurizer pressure less than 1750 psia and the RCS average temperature less than 500°F.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 34 TO

FACILITY OPERATING LICENSE NO. NPF-38

LOUISIANA POWER AND LIGHT COMPANY

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION

By application dated December 10, 1987, Louisiana Power and Light Company (LP&L or the licensee) requested changes to the Technical Specifications (Appendix A to Facility Operating License No. NPF-38) for Waterford Steam Electric Station, Unit 3. The proposed changes would revise Technical Specification 3.5.2, "ECCS subsystems - Tavg Greater than 350°F" and Technical Specification 3.5.3, "ECCS Subsystems - Tavg Less than 350°F" by adding a note to the Applicability section of both Technical Specifications to indicate that two Emergency Core Cooling System (ECCS) subsystems are required to be operable when Reactor Coolant System (RCS) average temperature is equal to or greater than 500°F.

In addition, the proposed change would also revise the title of the Technical Specifications such that it conforms to typical nomenclature. By letter dated March 24, 1988, the licensee further modified the Basis section to address the above changes.

2.0 DISCUSSION

The changes proposed by the licensee would revise Technical Specification 3.5.2 and 3.5.3 such that a note would be added to the Mode 3 applicability statement that will require both ECCS subsystems to be operable any time the RCS average temperature is equal to or greater than 500°F, regardless of the pressurizer pressure.

Also, the licensee would change the title of the Technical Specification subsections to reflect mode of operation rather than average coolant temperature.

3.0 EVALUATION

Currently Technical Specification 3.5.2 requires two independent ECCS subsystems to be operable when the reactor is in Modes 1, 2, and 3; however, the requirements of this Technical Specification in Mode 3 are applicable only if the pressurizer pressure is equal to or greater than 1750 psia. Technical Specification 3.5.3 currently requires one ECCS subsystem to be operable if the reactor is in Modes 3 and 4 with a requirement that the pressurizer pressure is less than 1750 psia in Mode 3. The

proposed change to both Technical Specifications are similar in that a note will be added to the Mode 3 applicability statement that will require both ECCS subsystems to be operable any time the RCS average temperature is equal to or greater than 500°F. The intent of these Specifications is to ensure there will be sufficient emergency core cooling capability available in the event of a loss of coolant accident (LOCA) coincident with a single failure that results in the loss of one ECCS subsystem. The Waterford 3 Cycle 2 safety analysis has shown that borated water from the High Pressure Safety Injection (HPSI) System is required to prevent the core from becoming critical during an uncontrolled RCS cooldown (i.e., a steam line break) from greater than 500°F. Therefore, the licensee must ensure that at least one train of the HPSI system is available to mitigate the consequences of a postulated steam line break accident initiated from an RCS average temperature of 500°F or greater. The proposed change will accomplish this by requiring two ECCS subsystems to be operable whenever the average RCS temperature is equal to or greater than 500°F. Therefore, even if one ECCS subsystem is assumed to fail, one train of HPSI will be available to inject borated water into the RCS during a steam line break.

The staff concludes that the proposed changes to Technical Specifications 3.5.2 and 3.5.3 constitute an additional restriction on plant operation to increase the margin of safety, and are, therefore, acceptable.

In addition to the above, the proposed change will also revise the title of Technical Specifications 3.5.2 and 3.5.3. The current title describes the Technical Specification in terms of average coolant temperature. It is standard practice to refer to plant conditions in terms of operating Modes rather than average coolant temperature. Therefore, the proposed change would revise the titles such that they conform to Technical Specification nomenclature and are acceptable.

4.0 CONTACT WITH STATE OFFICIAL

The NRC staff has advised the Administrator, Nuclear Energy Division, Office of Environmental Affairs, State of Louisiana of the proposed determination of no significant hazards consideration. No comments were received.

5.0 ENVIRONMENTAL CONSIDERATION

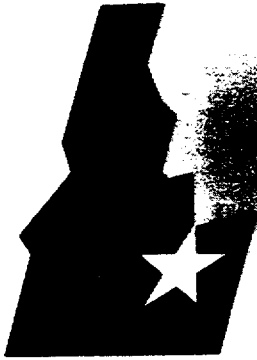
The amendment relates to changes in installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

6.0 CONCLUSION

Based upon its evaluation of the proposed changes to the Waterford 3 Technical Specifications, the staff has concluded that: there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. The staff, therefore, concludes that the proposed changes are acceptable, and are hereby incorporated into the Waterford 3 Technical Specifications.

Dated: March 30, 1988

Principal Contributor: J. Wilson



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Laboratory**

*Managed
by the U.S.
Department
of Energy*



*Work performed under
DOE Contract
No. DE-AC05-78-*

EGG-NTA-7446
April 1987

INFORMAL REPORT

CONFORMANCE TO GENERIC LETTER 83-28, ITEM 2.2.1--
EQUIPMENT CLASSIFICATION FOR ALL OTHER SAFETY-
RELATED COMPONENTS: WATERFORD-3

R. VanderBeek

Prepared for the
U.S. NUCLEAR REGULATORY COMMISSION

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TECHNICAL EVALUATION REPORT

CONFORMANCE TO GENERIC LETTER 83-28, ITEM 2.2.1--
EQUIPMENT CLASSIFICATION FOR ALL OTHER SAFETY-RELATED COMPONENTS:
WATERFORD-3

Docket No. 50-382

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ABSTRACT

This EG&G Idaho, Inc. report provides a review of the submittals for the Waterford Steam Electric Station, Unit No. 3 for conformance to Generic Letter 83-28, Item 2.2.1.

Docket No. 50-382

TAC No. 57705

FOREWORD

This report is supplied as part of the program for evaluating licensee/applicant conformance to Generic Letter 83-28 "Required Actions Based on Generic Implications of Salem ATWS Events." This work is being conducted for the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Division of PWR Licensing-A, by EG&G Idaho, Inc.

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Docket No. 50-382

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CONTENTS

ABSTRACT	11
FOREWORD	111
1. INTRODUCTION	1
2. REVIEW CONTENT AND FORMAT	2
3. ITEM 2.2.1 - PROGRAM	3
3.1 Guideline	3
3.2 Evaluation	3
3.3 Conclusion	4
4. ITEM 2.2.1.1 - IDENTIFICATION CRITERIA	5
4.1 Guideline	5
4.2 Evaluation	5
4.3 Conclusion	5
5. ITEM 2.2.1.2 - INFORMATION HANDLING SYSTEM	6
5.1 Guideline	6
5.2 Evaluation	6
5.3 Conclusion	6
6. ITEM 2.2.1.3 - USE OF EQUIPMENT CLASSIFICATION LISTING	7
6.1 Guideline	7
6.2 Evaluation	7
6.3 Conclusion	7
7. ITEM 2.2.1.4 - MANAGEMENT CONTROLS	8
7.1 Guideline	8
7.2 Evaluation	8
7.3 Conclusion	8

8. ITEM 2.2.1.5 - DESIGN VERIFICATION AND PROCUREMENT 9
 8.1 Guideline 9
 8.2 Evaluation 9
 8.3 Conclusion 9
9. ITEM 2.2.1.6 - "IMPORTANT TO SAFETY" COMPONENTS 10
 9.1 Guideline 10
10. CONCLUSION 11
11. REFERENCES 12

CONFORMANCE TO GENERIC LETTER 83-28, ITEM 2.2.1--
EQUIPMENT CLASSIFICATION FOR ALL OTHER SAFETY-RELATED COMPONENTS:
WATERFORD-3

1. INTRODUCTION

On February 25, 1983, both of the scram circuit breakers at Unit 1 of the Salem Nuclear Power Plant failed to open upon an automatic reactor trip signal from the reactor protection system. This incident was terminated manually by the operator about 30 seconds after the initiation of the automatic trip signal. The failure of the circuit breakers was determined to be related to the sticking of the undervoltage trip attachment. Prior to this incident, on February 22, 1983, at Unit 1 of the Salem Nuclear Power Plant, an automatic trip signal was generated based on steam generator low-low level during plant startup. In this case, the reactor was tripped manually by the operator almost coincidentally with the automatic trip.

Following these incidents, on February 28, 1983, the NRC Executive Director for Operations (EDO), directed the staff to investigate and report on the generic implications of these occurrences at Unit 1 of the Salem Nuclear Power Plant. The results of the staff's inquiry into the generic implications of the Salem unit incidents are reported in NUREG-1000, "Generic Implications of the ATWS Events at the Salem Nuclear Power Plant." As a result of this investigation, the Commission (NRC) requested (by Generic Letter 83-28 dated July 8, 1983¹) all licensees of operating reactors, applicants for an operating license, and holders of construction permits to respond to generic issues raised by the analyses of these two ATWS events.

This report is an evaluation of the responses submitted by Louisiana Power and Light for Waterford Steam Electric Station, Unit No. 3 for Item 2.2.1 of Generic Letter 83-28. The actual documents reviewed as a part of this evaluation are listed in the references at the end of this report.

2. REVIEW CONTENT AND FORMAT

Item 2.2.1 of Generic Letter 83-28 requests the licensee/applicant to submit, for staff review, a description of their programs for classification of their safety-related equipment includes supporting information, in considerable detail, as indicated in the guidelines preceding the evaluation of each sub-item.

As previously stated, each of the six sub-items of Item 2.2.1 is evaluated in a separate section in which the guideline is presented; an evaluation of the licensee's/applicant's response is made; and conclusions about its acceptability are drawn.

3. ITEM 2.2.1 - PROGRAM

3.1 Guideline

Licensees and applicants should confirm that an equipment classification program exists which provides assurance that all safety-related components are designated as safety-related on all plant documents, drawings and procedures and in the information handling system that is used in accomplishing safety-related activities, such as work orders for repair, maintenance and surveillance testing and orders for replacement parts. Licensee and applicant responses which address the features of this program are evaluated in the remainder of this report.

3.2 Evaluation

The licensee for Waterford Steam Electric Station, Unit No. 3 provided a response to Generic Letter 83-28 with submittals dated November 4, 1983² and November 15, 1985.³ These submittals included information that describes their safety-related equipment classification program. In the review of the licensee's response to this item, it was assumed that the information and documentation supporting this program is available for audit upon request.

The licensee has provided a description of the equipment classification program for the identification of safety-related activities for repair, maintenance, and procurement. However, the response does not directly confirm that all components designated as safety-related in the MEL/Q-list are also properly designated on plant documents, procedures and in the information handling systems used for safety-related activities. However, the licensee's response to Items 2.2.1.2 and 2.2.1.3 indicate that the documents used to control safety-related activities from start to finish are appropriately marked as safety-related. This is discussed in Sections 5.2 and 6.2. We consider this to be acceptable.

3.3 Conclusion

We have reviewed the licensee's information and, in general, find that the licensee's response is adequate.

4. ITEM 2.2.1.1 - IDENTIFICATION CRITERIA

4.1 Guideline

The applicant or licensee should confirm that their program used for equipment classification includes criteria used for identifying components as safety-related.

4.2 Evaluation

The licensee's response states that safety-related structures, systems, and components are identified as safety-related based on the criteria specified in the project management procedure PMP-321, "Determination of Safety/Q-Level Components for the MEL/Q-List". The procedure was not included in the response; however, review of Section 3.2 of the FSAR identified these criteria.

4.3 Conclusion

The licensee's response to this item is considered to be complete and is acceptable.

5. ITEM 2.2.1.2 - INFORMATION HANDLING SYSTEM

5.1 Guideline

The licensee or applicant should confirm that the program for equipment classification includes an information handling system that is used to identify safety-related components. The response should confirm that this information handling system includes a list of safety-related equipment and that procedures exist which govern its development and validation.

5.2 Evaluation

The licensee's response states that the Q-list is maintained current by a dedicated staff whose activities are governed by project management procedure PMP-321. This procedure is being updated to include requirements for Q-List maintenance activities. The Q-List information for components in the plant is entered in the data base and validated in accordance with project management procedure PMP-320.

5.3 Conclusion

The licensee's response to this item is considered to be complete and is acceptable.

6. ITEM 2.2.1.3 - USE OF EQUIPMENT CLASSIFICATION LISTING

6.1 Guideline

The licensee's or applicant's description should confirm that their program for equipment classification includes criteria and procedures which govern how station personnel use the equipment classification information handling system to determine that an activity is safety-related and what procedures for maintenance, surveillance, parts replacement and other activities defined in the introduction to 10 CFR 50, Appendix B, apply to safety-related components.

6.2 Evaluation

The licensee's response identifies the use of the Q-list, and Administrative procedures in the determination of safety-related activities in the areas of parts replacement, storage, maintenance, modification, testing, and surveillance. Collectively, these documents contain the controls to ensure that safety-related equipment is identified and handled in an appropriate manner.

6.3 Conclusion

The licensee's response to this item is considered to be complete and is acceptable.

7. ITEM 2.2.1.4 - MANAGEMENT CONTROLS

7.1 Guidelines

The applicant or licensee should confirm that the management controls used to verify that the procedures for preparation, validation and routine utilization of the information handling system have been followed.

7.2 Evaluation

The licensee's response states that the management controls established for activities related to the development, validation and maintenance of the Q-List are covered by procedures and instructions which are prepared, reviewed, and approved in accordance with project management procedure PMP-001, Preparation and Revision of Project Management Procedure/Instructions". The management controls established for activities related to the routine utilization of the Q-List are governed by Administrative procedure UNT-1-002 and QP-5-001, "Instructions, Procedures and Drawings."

7.3 Conclusion

The licensee's response to this item is considered to be complete and is acceptable.

8. ITEM 2.2.1.5 DESIGN VERIFICATION AND PROCUREMENT

8.1 Guideline

The applicant's or licensee's submittal should document that past usage demonstrates that appropriate design verification and qualification testing is specified for the procurement of safety-related components and parts. The specifications should include qualification testing for expected safety service conditions and provide support for the applicant's/licensee's receipt of testing documentation to support the limits of life recommended by the supplier. If such documentation is not available, confirmation that the present program meets these requirements should be provided.

8.2 Evaluation

The licensee's response states that specifications imposed upon the vendor are referenced on the Purchase Order Requisition based on either previous orders for the same equipment or specifications supplied by Engineering. Standard Clauses in UNT-8-001 are used to ensure that technical and quality requirements are specified consistently for safety and quality related equipment orders.

8.3 Conclusion

The licensee's response for this item is considered to be complete and is acceptable.

9. ITEM 2.2.1.6 - "IMPORTANT TO SAFETY" COMPONENTS

9.1 Guideline

The Generic Letter 83-28 states that the licensee's equipment classification program should include (in addition to the safety-related components) a broader class of components designated as "Important to Safety." However, since the Generic Letter does not require the applicant/licensee to furnish this information as part of their response, review of this item will not be performed.

10. CONCLUSION

Based on our review of the licensee's response to the specific requirements of Item 2.2.1, we find that the information provided by the licensee to resolve the concerns of Items 2.2.1 of Generic Letter 83-28 is acceptable. Item 2.2.1.6 was not reviewed as noted in Section 9 of this report.

11. REFERENCES

1. NRC Letter, D. G. Eisenhut to all Licensees of Operating Reactors, Applicants for Operating License, and Holders of Construction Permits, "Required Actions Based on Generic Implication of Salem ATWS Events (Generic Letter 83-28)," July 8, 1983.
2. Louisiana Power and Light letter, K. W. Cook to D. G. Eisenhut, NRC, November 4, 1983, W3P83-3911, 4-3-A20.02.02, 3-A1.01.04, L.02.
3. Louisiana Power and Light letter, K. W. Cook to G. W. Knighton, NRC, November 15, 1985, W3P85-3158, A4.05, NQA.

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