



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

Docket

March 8, 1989

Docket No. 50-~~368~~
382

Mr. J. G. Dewease
Senior Vice President - Nuclear Operations
Louisiana Power and Light Company
317 Baronne Street, Mail Unit 17
New Orleans, Louisiana 70160

Dear Mr. Dewease:

SUBJECT: NUCLEAR REACTOR REGULATION RESPONSE TO THE LOUISIANA POWER
AND LIGHT REQUEST FOR PARTIAL EXEMPTION FROM THE REQUIREMENTS
OF 10 CFR 50.62 FOR WATERFORD STEAM ELECTRIC STATION, UNIT 3
(TAC NO. 59156)

On October 7, 1988, Louisiana Power and Light (LP&L) submitted a request for a partial exemption from 10 CFR 50.62, "Requirements for Reduction of Risk From Anticipated Transients Without Scram (ATWS) Events for Light-Water-Cooled Nuclear Power Plants" (ATWS Rule), for Waterford 3. It was requested that LP&L be exempted from installing on Waterford 3 an Auxiliary Mitigating System Actuation Circuitry (AMSAC) which is required by the ATWS Rule to be diverse and independent from the existing reactor trip system (RTS). The LP&L request for the exemption has been denied because no new information has been presented to justify reconsideration of the requirements of the ATWS Rule by the Nuclear Regulatory Commission (NRC) staff.

In support of the exemption, LP&L presented four options for meeting the AMSAC requirement which LP&L rejected on the basis of cost-benefit considerations. LP&L therefore concluded that the Waterford 3 design needs only the diverse scram system and diverse turbine trip to meet the intent of the requirements set forth in the ATWS Rule. Similar arguments had been presented by the Combustion Engineering Owners Group (CEOG) in meetings with NRC and in topical reports. The CEOG was advised during those meetings to focus future arguments on changes in risk and competing safety interests with other existing systems that might result from installing AMSAC.

The NRC staff has reviewed the LP&L request for partial exemption and determined that the cost-benefit and value/impact ratios that formed the bases for the exemption were considered during the preparation and before the issuance of the ATWS Rule. The NRC concluded then that the safety benefits were justified and required the design of AMSAC to be diverse and independent from the existing RTS. In addition, the NRC staff is not persuaded by the arguments to conclude that lower-cost AMSAC alternatives are not feasible. In light of the lack of new information relative to changes in risk, costs/benefits, or competing safety interests that may have been claimed as a result of installing AMSAC, the NRC staff has no other recourse than to deny the LP&L request for a partial exemption to the ATWS Rule.

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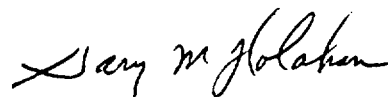
We bring to your attention the fact that the deadline for implementing the ATWS Rule was extended from two refueling outages after July 26, 1984 (as stated in the ATWS Rule) to the third refueling outage after the July 1984 date. This extension was noted in a letter from NRC to LP&L dated February 17, 1987.

Your October 7, 1988, exemption request indicated that the LP&L-proposed ATWS modifications would be installed by the end of the third refueling outage. The next refueling outage currently scheduled to begin about October 12, 1989 will be the third outage after the final ATWS rule. If you are unable to complete final implementation of the ATWS rule by that outage, you may be in violation of the rule. Therefore, you should submit to the NRC a new proposed schedule to meet the requirements of 10 CFR 50.62(c)(1) through (c)(5).

The LP&L submittal describes the competing risks between the need for a new control system designed to provide emergency feedwater under ATWS conditions and the need to isolate all feedwater to a ruptured steam generator. We expect that the Waterford 3 AMSAC will be designed and implemented in a manner that will not degrade the capability of the existing emergency feedwater system. We also expect that the diverse scram system and diverse turbine trip will be designed and implemented with the same considerations.

The NRC has concluded that implementation of the ATWS Rule should be independent of the staff's review of proposed equipment design. This conclusion was most recently conveyed to the Babcock and Wilcox Owners Group in my letter to Mr. L. C. Stalter, dated September 7, 1988, subject "August 17, 1988 B&W/NRC ATWS Meeting." The letter stated that the NRC would evaluate a plant-specific "conceptual" design for ATWS modifications and approve or disapprove the design with comments. A more detailed design description would then be provided to the NRC, but the installation process could begin before NRC issued its safety evaluation. Thus, final NRC approval of all equipment required by the ATWS Rule does not have to precede installation.

Sincerely,



Gary M. Holahan, Acting Director
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

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Waterford 3

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