

September 11, 2002

Mr. Joseph E. Venable
Vice President Operations
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - REQUEST FOR
DEVIATION FROM REQUIREMENTS OF APPENDIX R TO PART 50 OF
TITLE 10 OF THE CODE OF FEDERAL REGULATIONS (TAC NO. MB3724)

Dear Mr. Venable:

By letter dated November 9, 2001, Entergy Operations Inc., the licensee for Waterford Steam Electric Station, Unit 3 (Waterford 3), requested approval to deviate from certain technical requirements of Section III.G of Appendix R, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979," to Title 10 of the *Code of Federal Regulations*, Part 50 (10 CFR Part 50). Specifically, Waterford 3 proposed noncompliance with meeting required circuit separation requirements specified in 10 CFR Part 50, Appendix R, Section III.G, for three cables located above the refueling water storage pool.

While Waterford 3 was licensed to operate on March 31, 1989, and therefore excluded from meeting the Appendix R technical requirements, by letter dated November 10, 1981, you committed to meet the technical requirements and incorporated the requirement to meet Section III.G of Appendix R into the approved fire protection program. Implementation of the approved fire protection program is an operating license condition for the facility.

The staff has reviewed the deviation request and found it acceptable. Therefore, the request for deviation from a commitment to meet Section III.G of Appendix R to 10 CFR Part 50, as described in the attached safety evaluation, is granted.

Sincerely,

/RA/

Robert A. Gramm, Chief, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-382

cc: See next page

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Vice President Operations
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DEVIATION FROM REQUIREMENTS OF APPENDIX R TO PART 50 OF
TITLE 10 OF THE CODE OF FEDERAL REGULATIONS (TAC NO. MB3724)

Dear Mr. Venable:

By letter dated November 9, 2001, Entergy Operations Inc., the licensee for Waterford Steam Electric Station, Unit 3 (Waterford 3), requested approval to deviate from certain technical requirements of Section III.G of Appendix R, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979," to Title 10 of the *Code of Federal Regulations*, Part 50 (10 CFR Part 50). Specifically, Waterford 3 proposed noncompliance with meeting required circuit separation requirements specified in 10 CFR Part 50, Appendix R, Section III.G, for three cables located above the refueling water storage pool.

While Waterford 3 was licensed to operate on March 31, 1989, and therefore excluded from meeting the Appendix R technical requirements, by letter dated November 10, 1981, you committed to meet the technical requirements and incorporated the requirement to meet Section III.G of Appendix R into the approved fire protection program. Implementation of the approved fire protection program is an operating license condition for the facility.

The staff has reviewed the deviation request and found it acceptable. Therefore, the request for deviation from a commitment to meet Section III.G of Appendix R to 10 CFR Part 50, as described in the attached safety evaluation, is granted.

Sincerely,

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Robert A. Gramm, Chief, Section 1
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Office of Nuclear Reactor Regulation

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SAFETY EVALUATION BY THE
OFFICE OF NUCLEAR REACTOR REGULATION
LICENSEE REQUEST FOR DEVIATION FROM CERTAIN REQUIREMENTS OF
SECTION III.G OF APPENDIX R TO 10 CFR PART 50

1.0 INTRODUCTION

Appendix R, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979," to Title 10 of the *Code of Federal Regulations*, Part 50 (10 CFR Part 50), establishes fire protection features required to satisfy General Design Criterion 3, "Fire Protection," of Appendix A to 10 CFR Part 50 with respect to certain generic issues for nuclear power plants licensed to operate prior to January 1, 1979. While Waterford Steam Electric Station, Unit 3 (Waterford 3) was licensed to operate on March 31, 1989, and therefore excluded from meeting the Appendix R technical requirements, by letter dated November 10, 1981, Entergy Operations, Inc. (Entergy or the licensee), committed to meet the technical requirements of Appendix R to 10 CFR Part 50 for Waterford 3. The licensee incorporated the commitment to meet Section III.G of Appendix R into the approved fire protection program. Implementation of the approved fire protection program is an operating license condition for the facility.

By letter dated November 9, 2001, Entergy requested a deviation from certain technical requirements of Appendix R for Waterford 3. Specifically, the licensee requested a deviation from the required circuit separation requirements specified in 10 CFR Part 50, Appendix R, Section III.G, for three cables located above the refueling water storage pool (RWSP).

2.0 DEVIATION REQUESTED

The licensee requested a deviation from the technical requirements of Section III.G of Appendix R to 10 CFR Part 50, to the extent that it requires that redundant trains of cables within a fire area be separated by 1) a three-hour rated fire barrier, 2) a one-hour rated fire barrier with fire detection and an automatic fire suppression system, or 3) 20 feet (ft) with no intervening combustibles with fire detectors and an automatic fire suppression system. The deviation would apply to three essential plant cables, 32562B, 32562F, and 32561D, located within fire area RAB31 where the cables transverse above the RWSP.

3.0 DISCUSSION

Cables 32562B, 32562F, and 32561D are located in dedicated conduit in the fire area where they transverse the RWSP. The cables are located near the top of the RWSP, approximately

5 ft above the top of the water and 3 ft below the top of the tank. Cables 32562B and 32562F are B Train-required direct current (DC) cables. Cable 32561D is a AB Train-required DC cable. The cables are not separated from the redundant A Train cables by 20 ft, with no intervening combustibles. The RWSP has no fire detector or automatic fire suppression system.

4.0 EVALUATION

The cables are in dedicated conduit, where they transverse through a concrete tank approximately 5 ft above the level of the water and 3 ft below the ceiling. The tank contains only water. The RWSP is inaccessible during normal plant operation. Technical Specifications require that 475,500 gallons of borated water be maintained in the tank during operation. There is no possibility of a transient combustible fire in this tank during plant operation. A self-induced cable fire, in a dedicated conduit, would be confined to the affected cable in the conduit and would not affect the redundant safe shutdown cables. Since redundant trains of cables are not susceptible to fire damage inside of the tank where the deviation was requested, the installed configuration provides a level of fire protection equivalent to literal compliance with the regulations.

5.0 CONCLUSION

On the basis of its evaluation, the staff concludes that not meeting the fire protection features specified in Section III.G.2 of Appendix R for Cables 32562B, 32562F, and 32561D inside of the RWSP is an acceptable deviation from the technical requirements of Section III.G.2 of Appendix R to 10 CFR 50. The licensee's request for deviation is, therefore, granted.

Principal contributor: Phil Qualls

Date: September 11, 2002

Waterford Generating Station 3

cc:

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