Entergy

Entergy Nuclear South
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066
Tel 504 739 6440
Fax 504 739 6698
kpeters@entergy.com

Ken Peters
Director, Nuclear Safety Assurance
Waterford 3

W3F1-2004-0059

July 8, 2004

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Reactor Coolant System Leakage Detection
Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

Reference: Entergy Letter dated May 7, 2004, "License Amendment Request NPF-38-254 Reactor Coolant System Leakage Detection

Dear Sir or Madam:

The purpose of this letter is to request that the License Amendment Request regarding the Reactor Coolant System Leakage Detection Technical Specification (Reference 1) be reviewed on an exigent basis as allowed by 10 CFR 50.91(a)(6). This request was discussed during a conference call between Entergy Operations, Inc. (Entergy) and members of the NRC staff on July 8, 2004. The circumstances that necessitate this exigent request are the following.

Technical Specification (TS) 3/4.4.5.1 requires the following to be operable:

a. A containment atmosphere particulate radioactivity monitoring system, and
b. a containment sump level and flow monitoring system, and
c. either the containment air cooler condensate flow switches on at least three coolers or a containment atmosphere gaseous radioactivity monitoring system.

In the event that one leakage detection system is inoperable, the TS action requires that the inoperable leakage detection system be restored to operable within 30 days. In the event that two leak detection systems are inoperable, the TS require that the plant be shutdown (i.e. Hot Standby).

The containment sump monitor is currently inoperable (declared inoperable at approximately 11:15 on July 7, 2004) because of an apparent zero shift in indicated level. The preliminary apparent cause for this condition is a malfunctioning transmitter. The

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transmitter can only be repaired during plant shutdown conditions due to personnel hazardous conditions in the containment sump with the reactor at power. These conditions include very high radiation area and high ambient temperature in the containment sump area. The containment atmosphere gaseous radioactivity monitoring system is currently inoperable because of uncertainty whether the system can detect a one gpm leakage in one hour in accordance with Regulatory Guide 1.45. Thus, in the event that either the particulate monitor or the containment fan cooler condensate flow switches become inoperable, Waterford Steam Electric Station, Unit 3 (Waterford 3) would be in a six hour shutdown action statement.

The failure of the containment sump monitor was detected on July 7, 2004 and, based on troubleshooting to date, may not be able to be repaired without a unit shutdown. TS actions currently require that the containment sump monitor be repaired within 30 days before requiring Waterford 3 to shutdown.

The filter paper on the particulate radioactivity monitor is replaced approximately every two weeks, requiring that monitor to be declared inoperable. With the containment sump inoperable, Waterford 3 is required to enter the six hour shutdown action whenever the filter paper is replaced. The replacement of filter paper normally takes approximately 30 minutes. The filter paper was replaced last on July 8, 2004. The potential exists that during this replacement unforeseen problems could occur, such as damage to the paper drive assembly or other installation difficulties during the replenishment of paper. Also, there is the potential for other malfunctions of the particulate monitor or containment air cooler flow switches to occur while the containment flow and level sump monitor remains inoperable.

The License Amendment Request (Reference 1), if approved, would allow two of the three required leakage detection systems to be inoperable for up to 30 days. This would alleviate the need to place Waterford 3 in a six hour shutdown action if either the particulate monitor or containment fan cooler condensate flow switches become inoperable. The approval of the referenced License Amendment Request may also obviate the need for other immediate measures by the NRC staff and Entergy, such as a request for a Notice of Enforcement Discretion (NOED), if an additional leakage detection system became inoperable. Therefore, Entergy requests that the referenced License Amendment Request be reviewed and approved on an exigent bases in accordance with 10 CFR 50.91(a)(6).

This letter does not contain any commitments.

Sincerely,

K. J. Peters
Director, Nuclear Safety Assurance

KJP/RJM

cc: Mr. Bruce S. Mallett
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

NRC Senior Resident Inspector
Waterford Steam Electric Station Unit 3
P.O. Box 822
Killona, LA 70066-0751

U. S. Nuclear Regulatory Commission
Attn: Mr. N. Kalyanam
Mail Stop O-07D1
Washington, DC 20555-0001

Wise, Carter, Child & Caraway
ATTN: J. Smith
P.O. Box 651
Jackson, MS 39205

Winston & Strawn
ATTN: N.S. Reynolds
1400 L Street, NW
Washington, DC 20005-3502