



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

January 4, 1990

Packet No. 50-382

Mr. J. G. Dewease  
Senior Vice President - Nuclear Operations  
Louisiana Power and Light Company  
Post Office Box 60340  
New Orleans, Louisiana 70160

Dear Mr. Dewease:

SUBJECT: INSERVICE TESTING (IST) PROGRAM FOR PUMPS AND VALVES, WATERFORD  
STEAM ELECTRIC STATION, UNIT NO. 3, LOUISIANA POWER AND LIGHT  
COMPANY - CHANGE 2 TO REVISION 6 (TAC NO. 69819)

This letter provides the results of the staff's review of the Waterford 3 inservice testing program for pumps and valves, specifically, amendment to Revision 5 which was approved by letter to Louisiana Power and Light Company (LP&L) dated February 7, 1989.

By letter dated October 31, 1989, LP&L submitted a Change 2 to Revision 6. We are still in the process of reviewing the Revision 6 and Change 1. Nothing in this letter should be construed to imply approval of Revision 6 or Change 1 to Revision 6. However, the relief requested by the October 31, 1989 letter is needed in the near future as discussed in the request. The new reliefs are as follows.

1. Relief 3.1.57 -

It is requested that relief from full or partial stroke testing of gate valves, ACC-116A and ACC-116B, be granted from the requirements of ASME Code Section XI. These valves are being added to the IST program. They prevent the water from the auxiliary component cooling water (ACCW) system from entering the emergency feedwater system or condensate storage pool. They allow the ACCW to be used as a backup water supply to the steam generators upon the complete loss of the condensate system. The water in the ACCW is not suitable for use as the normal water source for the steam generators or steam supply system and any attempt to full or partial stroke the valves during normal operation (once every three months per Section XI) would unduly contaminate interconnecting systems with a decreasing benefit to safety. The contaminate would attack the high quality material integrity of the steam generators which serve as a principal boundary to reactor coolant and could necessitate the early replacement of vital secondary side components such as the steam generators and turbine. The proposed alternative is to full stroke the valves during refueling and can be accomplished by isolating the valves, stroke testing, draining and flushing to prevent cross-contamination. This alternative provides an acceptable level of confidence of valve operability without the potential for a decreasing benefit to safety.

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2. Relief 3.1.58 -

It is requested that relief from exercising check valves, ACC-114A and ACC-114B, be granted from the requirements of IWV-3520 of ASME Code Section XI. The code requires the check valves be operated at least once every three months. These check valves are in the same lines as the gate valves discussed in the first change above.

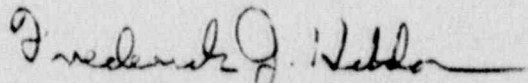
Operation of the check valve during normal operation would result in injecting ACCW contaminated water into the steam generators via the emergency feedwater system or into the condensate system. As above, this operation would have a decreasing benefit to safety and with possible early replacement of components. The proposed alternative is to disassemble and manually exercise the valves by hand to their fully open position at each refueling outage. This alternative provides an acceptable level of confidence of valve operability without the potential for a decreasing benefit to safety.

The staff has reviewed your analysis and agrees that a potential for degrading the quality of the water in the EFW system would exist if the required tests were conducted. The staff has also reviewed your alternatives, and we conclude that they provide an acceptable level of confidence of valve operability without the inherent risk of degrading the water quality in the EFW system. Thus, we have determined that the Change 2 proposed revision is acceptable for implementation provided the guidance on grouping and sampling in Generic Letter 89-04, Position 2, is followed. We have also determined that testing requirements are impractical for the items for which relief is being granted, and pursuant to 10 CFR 55.55a(g)(6)(i), that the granting of relief is authorized by law, will not endanger life or property or the common defense and security, and is otherwise in the public interest. In making this determination, we have given due consideration to the burden that could result if this requirement is imposed on your facility. This letter grants the relief identified above.

Program changes such as revisions or additional relief requests or deletion of any components from the IST program should be submitted for our review but should not be implemented prior to review or approval.

Please contact your Project Manager, David L. Wigginton at (301) 492-3027, if you need any clarification.

Sincerely,

  
Frederick J. Hebdon, Director  
Project Directorate IV  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

cc: See next page

Mr. Jerrold G. Dewease  
Louisiana Power & Light Company

Waterford 3

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2. Relief 3.1.58 -

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Original Signed By  
Frederick J. Hebdon

Frederick J. Hebdon, Director  
Project Directorate IV  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

cc: See next page

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OFC : *PD4/LA	*See previous concurrence	: OGC <i>caj</i>	: PD4/D <i>caj</i> :
NAME : PNoonan	: *PD4/PM	: <i>Moyes</i>	: FHebdon :
DATE : 12/11/89	: DWigginton	: 12/11/89	: 12/14/89 :
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