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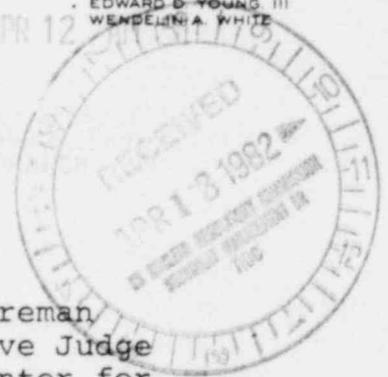
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April 8, 1982



Sheldon J. Wolfe, Esquire  
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In the Matter of  
Louisiana Power & Light Company  
(Waterford Steam Electric Station, Unit 3)  
Docket No. 50-382

Dear Administrative Judges:

During the hearing session on April 1, 1982, the Board asked to be provided with copies of any ACRS action taken as a result of the April 2, 1982 ACRS meeting which was related to the Emergency Feedwater System sua sponte issue. Tr. 1815-16. Applicant has just received a copy of the ACRS letter dated April 5, 1982 which reports on its meeting held April 1-2, 1982. A copy is attached for the Board's information.

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SHAW, PITTMAN, POTTS & TROWBRIDGE

Administrative Judges

Page Two

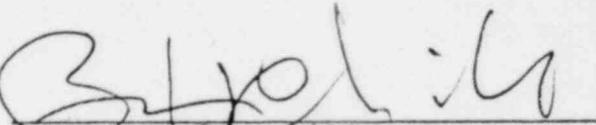
April 8, 1982

The ACRS concurred in the Staff's proposal to address the question of the need for rapid depressurization, but concluded that resolution "should not now be a condition for operation of System 80 plants at full power, or of plants having similar features." This conclusion of the ACRS is consistent with the Applicant's position that the issue is appropriate for generic resolution, rather than determination in an individual licensing proceeding, and that it is not a "serious safety matter" requiring urgent resolution via sua sponte consideration in the Waterford 3 proceeding.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By



Bruce W. Churchill  
Counsel for Applicant

Enclosure

cc: Service List



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555

April 5, 1982

Mr. William J. Dircks  
Executive Director for Operations  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Dircks:

Subject: RELIABILITY OF THE SHUTDOWN HEAT REMOVAL SYSTEM ON THE  
SYSTEM 80 DESIGN

The ACRS in its December 15, 1981 report to Chairman Palladino on the Combustion Engineering, Inc. Standard Reference System 80 commented on the reliability of the decay heat removal system. These comments addressed the lack of a capability for rapid, direct depressurization of the primary system to allow feed and bleed operations and the reliance placed upon the secondary system for heat removal capability. The ACRS Subcommittee on Decay Heat Removal Systems met with representatives of Combustion Engineering, Inc. and the NRC Staff on March 16, 1982 to discuss these issues. The ACRS discussed these issues further during its 264th meeting, April 1-2, 1982.

Representatives of Combustion Engineering have defended their design, stating that:

1. The System 80 NSSS will be coupled with highly reliable emergency feedwater systems (EFWS) by addition of an interface requirement, that the EFWS have an unavailability in the range of  $10^{-4}$  to  $10^{-5}$  per demand.
2. The System 80 NSSS is capable of achieving cold shutdown conditions using only safety grade systems even without offsite power and with an added single failure.
3. The System 80 steam generator design includes many features that will assure adequate tube integrity, minimizing concerns associated with operating reactors.
4. Even if all auxiliary feedwater supply were somehow lost, the secondary side of the steam generators could be depressurized to allow use of low head pumps which might be aligned to provide water to the steam generators from a number of sources.
5. Probabilistic analyses have not shown that installing PORVs will result in a significant improvement in safety. The added costs are not justified.

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*Has not  
designated*

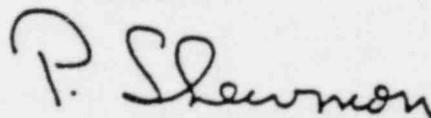
April 5, 1982

Combustion Engineering has proposed that the issues associated with the Committee's comments on the System 80 design be resolved in a continuing dialogue among the ACRS, the NRC Staff, and Combustion Engineering. It is the NRC Staff's intention to address these issues on an expeditious schedule with all applicants requesting licenses for Combustion Engineering NSSS designs which do not have capability for rapid depressurization independent of the steam generator. We concur with this approach and wish to be kept informed.

The Combustion Engineering response to the Committee's comments on the System 80 design emphasizes the expected very high reliability of the feedwater systems and the integrity of the steam generators. We believe that these are necessary goals but note that past operating experience indicates that these goals are difficult to achieve. We believe that for this reason Combustion Engineering and the NRC Staff should consider further the addition of valves of a size to facilitate rapid depressurization of the System 80 primary coolant system as stated in the Committee's December 15, 1981 letter on the System 80 design. We believe that a plan for addressing this issue should be formulated in the near future. We wish to be kept informed and to discuss this further with Combustion Engineering and the NRC Staff.

We believe that, while this evaluation should be conducted expeditiously, its resolution should not now be a condition for operation of System 80 plants at full power, or of plants having similar features. The need for future hardware or procedural changes should be contingent upon results of this evaluation.

Sincerely,



P. Shewmon  
Chairman

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of )  
 )  
LOUISIANA POWER & LIGHT COMPANY ) Docket No. 50-382  
 )  
(Waterford Steam Electric )  
Station, Unit 3) )

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