



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

October 2, 1990

Docket No. 50-382

Mr. Ross P. Barkhurst  
Vice President Operations  
Entergy Operations, Inc.  
Post Office Box B  
Killona, Louisiana 70066

Dear Mr. Barkhurst:

SUBJECT: LOUISIANA POWER & LIGHT RESPONSE TO GENERIC LETTER 89-19, "REQUEST FOR ACTION RELATED TO RESOLUTION OF UNRESOLVED SAFETY ISSUE A-47 'SAFETY IMPLICATION OF CONTROL SYSTEMS IN LWR NUCLEAR POWER PLANTS' PURSUANT TO 10 CFR 50.54(f)" (TAC 75016)

By letter dated March 14, 1990, Louisiana Power & Light (LP&L) Company responded to Generic Letter 89-19, "Request for Action Related to Resolution of Unresolved Safety Issue A-47, 'Safety Implications of Control Systems in LWR Nuclear Power Plants' Pursuant to 10 CFR 50.54(f)." In that letter, LP&L stated that more detailed design studies and safety assessments must be completed before a decision can be made regarding implementation of a steam generator overfill protection system (SGOPS) at Waterford Generating Station, Unit No. 3. This conclusion is based upon inherent plant-specific differences and the implication that SGOPS may increase the probability of loss of feedwater events due to inadvertent SGOPS actuation. Moreover, the LP&L letter stated that the appropriate framework to evaluate steam generator overfill events and the safety impact of implementing a steam generator overfill protection system is the Individual Plant Examination (IPE).

We do not agree with the LP&L position that a more detailed design and safety assessment using the IPE is an appropriate framework to continue the evaluation of steam generator overfill safety impacts. Previous NRC analyses performed to evaluate alternatives to resolve USI A-47, "Safety Implications of Control Systems," provided insight with respect to the safety benefits, impacts, and costs of modifications for the overfill protection. Plant-specific differences were considered in the development of NUREG-1218, "Regulatory Analysis for Resolution of USI A-47," and in preparation of the Generic Letter. Ample opportunity was provided for comments on this issue when the Federal Register notice was published in May 1989.

Combustion Engineering (CE) plants, as a class, do not provide steam generator overfill protection. Overfill events have occurred at CE plants and other LWRs. The consequences resulting from such events depend largely on piping system integrity, are difficult to model accurately and have large uncertainties. It is for these reasons that IPE evaluation will not add significant information to close this issue. Further, we believe that the potential negative impacts of inadvertent isolation of feedwater can be made insignificant through sound design, with reliable equipment, and with implementation of a reasonable test strategy.

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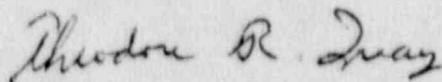
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Mr. Ross R. Barkhurst

- 2 -

Implementation of steam generator overflow protection for Waterford 3 should be achieved at your earliest convenience. We request you respond with an appropriate schedule within 45 days from receipt of this letter.

Sincerely,



Theodore R. Quay, Acting Director  
Project Directorate IV-1  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

cc: See next page

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Sincerely,

Original signed by:

Theodore R. Quay, Acting Director  
Project Directorate IV-1  
Division of Reactor Projects - III  
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