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Waterford 3

W3F1-94-0042

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PR

April 7, 1994

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Delay of Enhancement Modification Implementation for
Containment Spray Pumps Starting Time

Gentlemen:

The purpose of this letter is to inform you of a delay that has been experienced in the implementation of a planned enhancement modification for the Containment Spray Pumps starting circuitry.

As you know, during this refueling outage a modification to the Containment Spray Pumps starting circuitry was planned. The purpose of this modification is to delay pump start approximately 2 seconds upon receipt of a Containment Spray Actuation Signal (CSAS). This time delay would allow Containment Spray Isolation valves CS-125 A(B) to start opening before pump pressure is developed. To fully implement this modification, a change to Technical Specification Response Time Tables, specifically table 3.3-5, is necessary. As such, Waterford 3 submitted Technical Specification Change Request (TSCR) NPF-38-151 on February 14, 1994. As discussed with members of the NRC, due to an unforeseen delay in the approval of this TSCR, the subject modification, although installed, cannot be utilized when Waterford 3 makes its entry into the applicability mode for Containment Spray. The applicability of the Technical Specification LCO for Containment Spray is Mode 4 3, 2 and 1, with Mode 4 requirements beginning when the Reactor Coolant system pressure is greater than or equal to 400 psia.

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As discussed with your staff, Containment Spray Isolation Valves CS-125 A and B have undergone extensive refurbishment and subsequent retesting to restore them to original design conditions this outage. CS-125A has had its valve stem, valve gate, and seat rings replaced as well as its "soft goods". CS-125B has had its valve gate and seat rings replaced along with its "soft goods". In addition to its physical refurbishment, CS-125B has had an additional solenoid vent valve installed on its actuator to provide the same venting capacity as was installed on CS-125A during the previous cycle. Retesting of these valves has been very successful with indications of significant improvement in valve performance.

The valves' retest conditions were established at system design pressure. To prove operability, the valves were stroke tested with design differential pressure of 300 psid across the valves. The retest stroke times were 3.15 seconds for CS-125A and 3.3 seconds for CS-125B. These stroke times are significantly improved from those observed during previous IST surveillances and tests. Normal IST surveillance valve strokes are done with only static riser head differential across the valves. Additionally, "Flowsanner" data taken during valve stroke testing indicated that the valves operated smoothly and quickly.

Due to the delay in TSCR NPF-38-151 approval, the installed time delay will be temporarily removed from the Containment Spray Pump start circuitry and additional system dynamic testing may be performed. Pump start peak pressures upstream of CS-125 A and B will be measured after the system is filled and vented. Should these pressures result in valve differential pressures greater than the design differential pressure of 300 psid, CS-125 A and B would then be stroke tested at the greater differential pressure. Pending successful completion of this test the Containment Spray system will be declared OPERABLE base upon demonstrated system performance (i.e., improved stroke times and venting methods) and currently approved Technical Specifications. Upon approval of the TSCR, Waterford 3 will place the time delay back into the Containment Spray pump's start circuitry and perform appropriate retesting.

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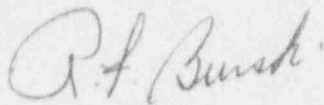
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If you have any further questions you may contact W. Pendergrass at phone
number (504) 739-6254.

Very truly yours,



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cc: L.J. Callan, NRC Region IV
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NRC Resident Inspectors Office