



Entergy Operations

Entergy Operations, Inc.
312 Baronne St.
New Orleans, LA 70112
Tel 504-595-2800
Tel 504-739-6774

Raymond F. Burski
Manager
Safety & Regulatory Affairs

W3P90-1914
A4.05
QA

December 27, 1990

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
Planned Implementation of Generic Letter 90-06

Gentlemen:

On June 25, 1990, the Nuclear Regulatory Commission (NRC) published the subject generic letter (GL) to advise licensees of their position on two pressurized water reactor (PWR) issues. Two enclosures to the GL document the staff position resulting from the resolution of Generic Issue 70 (GI-70, "Power-Operated Relief Valve and Block Valve Reliability"), and Generic Issue 94 (GI-94, "Additional Low-Temperature Overpressure Protection for Light-Water Reactors"). The staff requests certain actions to be taken by Entergy to enhance safety at Waterford 3. The purpose of this letter is to document Entergy's plan of implementation of GL 90-06 relating the PORVs and block valves and to low-temperature overpressure protection.

The GL contains two enclosures, each addressing one of the two generic issues. Enclosure A to the GL describes the staff's position on the resolution of GI-70 addressing PORVs and block valves. Waterford 3 does not have PORVs nor block valves. Therefore, no actions are necessary to meet requirements identified in Enclosure A.

Enclosure B to the GL identifies the staff position on low-temperature overpressure protection. It describes changes made to Technical Specification (TS) 3.4.8.3, Overpressure Protection Systems. Entergy intends to submit a license amendment request to modify the TS consistent with the text supplied with the GL enclosure. Two exceptions already identified are described below.

9101030270 901227
PDR ADDCK 05000382
P PDR

A019
/10

W3P90-1914

Planned Implementation of Generic Letter 90-06

December 27, 1990

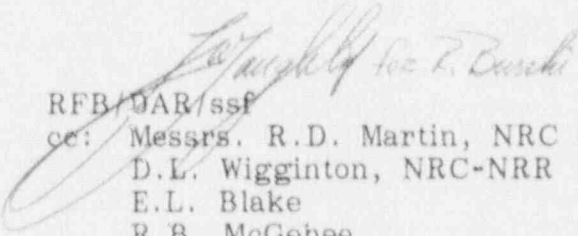
Page 2

- 1) A footnote to Waterford 3 TS 3.4.8.3 will be retained specifying its applicability in Mode 4 to temperatures less than or equal to 260°F during inservice leak and hydrostatic testing with the Reactor Coolant System temperature changes restricted in accordance with TS 3.4.8.1g. This was an amendment granted by the NRC on May 30, 1986, to allow compliance with TS requirements to establish the integrity of all ASME Code Class 1, 2 and 3 components.
- 2) The text of the GL TS Surveillance Requirement requires operability of the PORVs to be demonstrated. Waterford 3 does not have PORVS. Therefore, the required analog channel operation tests and channel calibrations will be unnecessary. However, operability of the Shutdown Cooling System suction line relief valves should be demonstrated. Therefore, the modification will require each valve in the suction path between the Reactor Coolant System and the shutdown cooling relief valve to be verified as open at least once every 72 hours.

Additionally, Enclosure B is under consideration by both Entergy and the Combustion Engineering Owners Group. Other exceptions may be identified as a result of this review.

The request to modify the TS for low-temperature overpressure protection will be made in accordance with the schedule specified in the GL. If there are any questions or comments on this, please direct them to David Rothrock on (504) 739-6693.

Very truly yours,


RFB/DAR/ssf

cc: Messrs. R.D. Martin, NRC Region IV
D.L. Wigginton, NRC-NRR
E.L. Blake
R.B. McGehee
NRC Resident Inspectors Office