



Entergy
Operations

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QA

February 6, 1991

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

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPP-38
Inservice Inspection Program

Gentlemen:

At the staff's request, Entergy Operations, Inc. submits the following information to clarify our position, relative to our upcoming refueling outage, concerning ASME Section XI inspection requirements (Table IWB-2500-1, Examination Category B-L-1, Item B12.10) for the volumetric examination of the reactor coolant pump casing welds.

Waterford 3's first ten-year inservice inspection interval covers the period from September 24, 1985 to September 24, 1995. Louisiana Power & Light submitted the original inspection program in letter W3P85-1298 dated May 28, 1985, and updates per letter W3P85-3273 dated November 26, 1985 (Revision 1), letter W3P86-0099 dated June 16, 1986 (Revision 2), and letter W3P87-1731 dated October 15, 1987 (Revision 3). In a letter dated June 6, 1989, the Nuclear Regulatory Commission provided Safety Evaluations resulting from the staff's review of the Waterford 3 Inservice Inspection Program for all submittals through Revision 3.

Waterford 3's original Inservice Inspection Program (and subsequent three revisions) included Relief Request number ISI-004 which addressed the volumetric examination of pump casing welds and the visual examination of the interior pump casing surfaces. The relief request offered proposed alternatives to the required Section XI volumetric and visual exams. These alternatives were to conduct visual examinations of the external weld surfaces and accessible internal surfaces if the pump were disassembled for maintenance.

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The NRC Safety Evaluation granted Relief Request ISI-004 with conditions that Waterford 3 perform the proposed alternate visual examinations. In addition, the safety evaluation stated that Waterford 3 must perform the volumetric exam if the pump were disassembled to the extent that the welds were accessible, or perform a state-of-the-art ultrasonic test from the exterior surface if the pump is not disassembled during the interval.

In March 1990, ASME approved Section XI Code Case N-481 concerning "Alternate Examination Requirements for Cast Austenitic Pump Casings". Code Case N-481 allows additional flexibility for possible alternatives to the volumetric exam. Existing code requirements allow exam deferral and the ability to pursue code case alternatives. Based on these factors, Waterford 3 believed that the conditions contained in the NRC's safety evaluation were more stringent than the requirements currently stipulated in the code. As such, Waterford 3 decided to withdraw Relief Request ISI-004 and revert back to the original code requirements. Revised relief requests, in conjunction with Revision 4 of the Waterford 3 Inservice Inspection Program, were submitted to the NRC per Entergy letter W3P90-1163 dated September 6, 1990, and included the deletion of Relief Request number ISI-004.

Since the submittal of Revision 4, Waterford 3 has identified some specific concerns with Reactor Coolant Pump 2A. These concerns include gasket leakage in the casing flange area. As a result, planned Refuel 4 outage activities include the disassembly of Reactor Coolant Pump 2A. The pump will be disassembled to replace gaskets, inspect and repair seating surfaces as required, and verify stud integrity. In addition, a VT-3 visual examination will be conducted in accordance with the ASME Section XI inspection requirements (Table IWB-2500-1, Examination Category B-L-2, Item B12.20) for the visual examination of internal pump casing surfaces.

Upon consideration of the radiological, manpower and scheduling impacts associated with the performance of the volumetric examination during this outage, Waterford 3 has elected to defer the volumetric examination of pump casing welds. Waterford 3 does not anticipate any safety significant problems with the reactor coolant pump casings or casing welds. Industry operating experience with cast stainless steel pressure vessels and pump casings has been good. Generic concerns to date have not indicated a specific need for a volumetric exam of the Waterford 3 reactor coolant pumps at this time during our inspection interval. The visual inspection planned for Refuel 4 will provide a general assessment of the internal casing surfaces which is expected to support these expectations. For these reasons, we believe that the deferral of the volumetric exam is adequately supported, without sacrifice to quality and safety assurance.

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If you have any questions concerning this response, please contact
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Very truly yours,



R.F. Burski
Director, Nuclear Safety

RFB/BRL/esf
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