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Docket File (50-382)

LB #3 Rdg

Docket No. 50-382

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NSIC  
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GKnighton  
JLee  
JWilson  
OELD  
ACRS (16)  
ELJordan  
JMTaylor

Mr. L. V. Maurin  
Vice President Nuclear Operations  
Louisiana Power & Light Company  
142 DeLaronde Street  
New Orleans, Louisiana 70174

Dear Mr. Maurin:

The deficiency described in your September 3, 1982 letter (Ref. 1) regarding the failure of the Waterford-3 CPC software to apply the failed - CEAC penalty factor to the local power density (LPD) as required by the functional specification has caused staff concern. In Question 10 of "Request for Additional Information Regarding Waterford-3 CPC" of our February 10, 1983 letter (Ref. 2), we have indicated that the deficiency should be corrected.

Your "Supplement to Waterford-3, Cycle 1 CPC/CEAC PHASE II Software Verification Test Report" submitted with your January 27, 1983, letter (Ref. 3) provided a quality assurance analysis result regarding the LPD PF deficiency and concluded that the current CPC software is acceptable for operation without the application of the penalty factor to the LPD calculation. However, the staff believes that the nature of the CPC software protection logic is not amenable to an evaluation or test program which can provide complete assurance that all circumstances requiring LPD trip protection have been adequately analyzed. Even if your conclusion is valid, the staff believes that the error degrades the protection provided by the CPCs by effectively eliminating one software trip path to the protection circuit. We therefore conclude that the current Waterford-3 CPC software is unacceptable with the LPD PF deficiency uncorrected. The postponement, expressed in your January 27, 1983 letter, of the correction of the CPC software error until the next planned CPC software modification prior to first reload is not acceptable.

We will require that the CPC software be corrected to conform to its design specifications prior to issuing an operating license. Alternatively, if the software correction cannot be implemented prior to fuel load, we will accept a commitment from you to complete this correction prior to operation above the 5 percent power level and will condition your license to reflect your commitment.

Sincerely,

Original signed by:  
Thomas M. Novak

Thomas M. Novak, Assistant Director  
for Licensing

Division of Licensing  
Office of Nuclear Reactor Regulation

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DATE	3/3/83	3/31/83	4/9/83			

References:

1. Letter from L. V. Maurin (LP&L) to R. L. Tedesco (NRC), "Waterford Steam Electric Station - Unit No. 3, Docket No. 50-382, CPC Software Functional Inconsistency," September 3, 1982.
2. Letter from G. Knighton (NRC) to L. V. Maurin (LP&L), "Request for Additional Information Concerning CPC/RPCS at Waterford 3," February 10, 1983.
3. Letter from L. V. Maurin (LP&L) to G. Knighton (NRC), "Waterford SES Unit 3 Test Report Supplement, CPC/CEAC PHASE II Software Verification, CPC Software Functional Inconsistency," January 27, 1983.

OFFICE ▶	.....	.....	.....	.....	.....	.....	.....
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