LOUISIANA POWER & LIGHT / 142 DELARONDE STREET • P. O. BOX 6008
NEW ORLEANS, LOUISIANA 70174-6008 • (504) 366-2345

MIDDLE SOUTH UTILITIES SYSTEM

February 10, 1984

W3P84-0318
Q-3-N77.07
Q-3-A29.20

Director of Nuclear Reactor Regulation
Attention: Mr. G. W. Knighton
Licensing Branch No. 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Waterford 3 SES
Docket No. 50-382
Preservice Inspection Program

REFERENCE: LP&L Letter W3I83-0252 dated 8/11/83

Dear Sir:

SSER #5 Section 5.2.4 requires that LP&L submit requests for relief from impractical examination requirements. Attached for your review are relief requests resulting from the PSI hanger/hanger support visual examinations. These are the final relief requests we expect to have prior to fuel load.

Also attached for your information is a signed NIS-1 form for the Eddy Current Test Report submitted via the referenced letter. As discussed with your Mr. Martin Hum, the PSI final report will be submitted to the NRC 90 days following the last inspection.

Yours very truly,

K W Cook

K. W. Cook
Nuclear Support & Licensing Manager

KWC/RMF/cb

cc: E. L. Blake, W. M. Stevenson, J. Wilson, G. L. Constable, M. Hum

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1/1

ATTACHMENT 1

RELIEF REQUESTS

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

REQUEST FOR RELIEF

LOUISIANA POWER & LIGHT

MIDDLE SOUTH UTILITIES SYSTEM

RELIEF REQUEST NO: PSI-07

COMPONENT/ITEM/SYSTEM:	CODE CLASS:	CODE CATEGORY:	ITEM NO:	SUBARTICLE
Component Supports listed on Attach A supporting system(s) as noted.	Component Supports	F-A F-B F-C	F-1 F-2 F-3 F-4	IWF-1300 IWF-2200 IWF-2400

CODE REQUIREMENT: ASME XI, 1980 ed. w/81 addenda, identifies examination boundaries for compenent supports (IWF-1300), requires that all exams be performed completely once as a preservice examination (IWF-2200), and requires that inservice examinations be completed per the component inservice inspection schedule (IWF-2400).

BASIS/JUSTIFICATION: Component supports are in penetrations such that supports are completely inaccessible for examination.

ALTERNATIVE EXAMINATION(S): Construction examinations were conducted to verify acceptability of component support installations in accordance with the applicable construction code(s). Examination records are on file by support number.

SCHEDULE FOR IMPLEMENTATION:

Preservice and Inservice Inspection.

COMMENTS/SKETCHES:

ATTACHMENT(S): ____YES ____NO

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

LOUISIANA POWER & LIGHT REQUEST FOR RELIEF

MIDDLE SOUTH UTILITIES SYSTEM

RELIEF REQ. NO. PSI-07
ATTACH. A
PAGE 1 OF 1

Component(s) - Supports listed below.
System(s) - Chilled Water (AC), Component Cooling (CC), and Fuel Pool Cooling (FS) piping.
Category I - Geometric Inaccessibility - Restraint in penetration.

Support No.	Line No.	Code Class
ACR-586	3AC6-41A	3
ACR-587	3AC6-42A	3
CCRR-715 (east/west)	3CC20-2B	3
CCRR-526	3CC20-107A	3
CCRR-445	3CC20-201B	3
FSRR-3010	3FS12-51A/B	3

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

REQUEST FOR RELIEF

LOUISIANA POWER & LIGHT

MIDDLE SOUTH UTILITIES SYSTEM

RELIEF REQUEST NO:

PSI-08

COMPONENT/ITEM/SYSTEM:	CODE CLASS:	CODE CATEGORY:	ITEM NO:	SUBARTICLE
Component Supports listed on Attach A supporting system(s) as noted.	Component Supports	F-A F-B F-C	F-1 F-2 F-3 F-4	IWF-1300 IWF-2200 IWF-2400

CODE REQUIREMENT: ASME XI, 1980 ed. w/81 addenda, identifies examination boundaries for component supports (IWF-1300), requires that all exams be performed completely once as a preservice examination (IWF-2200), and requires that inservice examinations be completed per the component inservice inspection schedule (IWF-2400).

BASIS/JUSTIFICATION: Component support access is partially blocked in area of integrally welded attachment(s) by adjacent U-bolt(s). U-bolts are not easily removable. PSI relief is requested based on recent PSI dye penetrant examination which included the currently inaccessible areas. Note: During ISI, VT will be conducted concurrent with the required surface inspection.

ALTERNATIVE EXAMINATION(S): Construction examinations were conducted to verify acceptability of component support installations in accordance with the applicable construction code(s). Examination records are on file by support number. See also Comment 1 below.

SCHEDULE FOR IMPLEMENTATION:

Preservice Inspection.

COMMENTS/SKETCHES:

1. During pre-service surface examination, inaccessible areas were subject to 100% surface inspection. Records are available in the LP&L PSI file.

ATTACHMENT(S): ____YES ____NO

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

LOUISIANA POWER & LIGHT REQUEST FOR RELIEF

MIDDLE SOUTH UTILITIES SYSTEM

RELIEF REQ. NO. PSI-08
ATTACH. A
PAGE 1 OF 1

Component(s) - Supports listed below.
System(s) - Mainsteam (MS)
Category II - Geometric Inaccessibility - Restraint access partially blocked by other restraint.

Support No.	Line No.	Code Class
MSRR-243 (east/west)	2MS40-5A	2
MSRR-247	2MS40-39B	2
MSRR-248 (east/west)	"	"

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

REQUEST FOR RELIEF

LOUISIANA POWER & LIGHT

MIDDLE SOUTH UTILITIES SYSTEM

RELIEF REQUEST NO:

PSI-09

COMPONENT/ITEM/SYSTEM:	CODE CLASS:	CODE CATEGORY:	ITEM NO:	SUBARTICLE
Component Supports listed on Attach A supporting system(s) as noted.	Component Supports	F-A F-B F-C	F-1 F-2 F-3 F-4	IWF-1300 IWF-2200 IWF-2400

CODE REQUIREMENT: ASME XI, 1980 ed. w/81 addenda, identifies examination boundaries for compenent supports (IWF-1300), requires that all exams be performed completely once as a preservice examination (IWF-2200), and requires that inservice examinations be completed per the component inservice inspection schedule (IWF-2400).

BASIS/JUSTIFICATION: Component support access is partially blocked by fire/heat resistant insulation applied to protect supporting structural steel. The insulation is applied by spraying Flamastic or Pyrocrete over a wire mesh support. The insulation solidifies into a non-removable mass approximately 3"-5" thick. Fire barrier integrity is a Limiting Condition for Operation as identified in W-3 Technical Specification paragraph 3.7.11. This creates undue hardship in conducting examinations. Accessible (uninsulated) areas of supports are examined.

ALTERNATIVE EXAMINATION(S): Construction examinations were conducted to verify acceptability of component support installations in accordance with the applicable construction code(s). Examination records are on file by support number.

SCHEDULE FOR IMPLEMENTATION:

Preservice and Inservice Inspection.

COMMENTS/SKETCHES:

ATTACHMENT(S): ___YES ___NO

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

LOUISIANA POWER & LIGHT

MIDDLE SOUTH UTILITIES SYSTEM

REQUEST FOR RELIEF

RELIEF REQ. NO. PSI-09
ATTACH. A
PAGE 1 OF 1

Component(s) - Supports listed below
System(s) - Component Cooling (CC)
Category III - Inaccessibility - Restraint access partially blocked by permanent fire/heat insulation.

Support No.	Line No.	Code Class
CCRR-468	3CC6-71A	3
CCRR-469	"	"
CCRR-470	"	"
CCRR-1068	"	"
CCRR-529	3CC6-71B	3
CCRR-530	"	"
CCRR-531	"	"
CCRR-461	3CC16-202A	3

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

REQUEST FOR RELIEF

LOUISIANA POWER & LIGHT

MIDDLE SOUTH UTILITIES SYSTEM

RELIEF REQUEST NO:

PSI-10

COMPONENT/ITEM/SYSTEM:	CODE CLASS:	CODE CATEGORY:	ITEM NO:	SUBARTICLE
Component Supports listed on Attach A supporting system(s) as noted.	Component Supports	F-A F-B F-C	F-1 F-2 F-3 F-4	IWF-1300 IWF-2200 IWF-2400

CODE REQUIREMENT: ASME XI, 1980 ed. w/81 addenda, identifies examination boundaries for compenent supports (IWF-1300), requires that all exams be performed completely once as a preservice examination (IWF-2200), and requires that inservice examinations be completed per the component inservice inspection schedule (IWF-2400).

BASIS/JUSTIFICATION: Component supports are in penetrations which are closed off by permanently installed fire seals. Fire seal material is pumped into the penetration in semi-liquid state and solidifies into a non-removable mass. Fire seal integrity is a Limiting Condition for Operation as identified in W-3 Technical Specification paragraph 3.7.11. This creates undue hardship in conducting examinations.

ALTERNATIVE EXAMINATION(S): Construction examinations were conducted to verify acceptability of component support installations in accordance with the applicable construction code(s). Examination records are on file by support number.

SCHEDULE FOR IMPLEMENTATION:

Preservice and Inservice Inspection.

COMMENTS/SKETCHES:

ATTACHMENT(S): ____YES ____NO

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

LOUISIANA POWER & LIGHT REQUEST FOR RELIEF

MIDDLE SOUTH UTILITIES SYSTEM

RELIEF REQ. NO. PSI-10
ATTACH. A
PAGE 1 OF 1

Component(s) - Supports listed below.
System(s) - Chilled Water (AC), Component Cooling (CC), Containment Spray (CS), Safety Injection (SI)
Category IV - Inaccessibility - Restraint in penetration with permanent fire Seal.

Support No.	Line No.	Code Class
ACR-413	3AC6-41A	3
ACR-600	3AC6-41B	3
ACR-412	3AC6-42A	3
ACR-601	3AC6-42B	3
CCRR- 781	3CC20-2B	3
CCRR-712	3CC20-3B	3
CCRR-932	3CC6-6A	3
CCRR-465	3CC6-71A	3
CCRR-471	"	"
CCRR-119	3CC10-83A	3
CCRR-1072	3CC6-106A	3
CCRR-1111	"	"
CCRR-1091	3CC6-106B	3
CCRR-913	3CC8-139A/B	3
CCRR-37	3CC6-144A/B	3
CCRR-420	3CC16-202B	3
CCRR-1121	3CC10-289A	3
CCRR-1122	3CC10-290B	3
CSRR-361	2CS10-7B	2
CSRR-372	2CS10-9B	2
CSRR-334	2CS10-11A	2
SIRR-200	3SI6-48A/B	3
SIRR-391	2SI8-113RL1A	2
SIRR-939	2SI8-130RL2A	2
SIRR-996	3SI6-180A	3

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

REQUEST FOR RELIEF

LOUISIANA POWER & LIGHT

MIDDLE SOUTH UTILITIES SYSTEM

RELIEF REQUEST NO:

PSI-11

COMPONENT/ITEM/SYSTEM:	CODE CLASS:	CODE CATEGORY:	ITEM NO:	SUBARTICLE
Component Supports listed on Attach A supporting system(s) as noted.	Component Supports	F-A F-B F-C	F-1 F-2 F-3 F-4	IWF-1300 IWF-2200 IWF-2400

CODE REQUIREMENT: ASME XI, 1980 ed. w/81 addenda, identifies examination boundaries for compenent supports (IWF-1300), requires that all exams be performed completely once as a preservice examination (IWF-2200), and requires that inservice examinations be completed per the component inservice inspection schedule (IWF-2400).

BASIS/JUSTIFICATION: Component support access is partially blocked by permanent (non-removable) insulation. Supported lines operate at temperatures substantially below ambient and are, therefore, subject to severe condensation. The type insulation used has a permanently sealed vapor barrier to exclude moisture, and removal of the insulation in the support area results in vapor contamination of the surrounding insulation. Possible alternate removable type vapor barrier insulation is not acceptable for use due to high fluoride/chloride content. The requirement for a vapor barrier seal necessitates non-removable insulation. Accessible areas of supports are inspected.

ALTERNATIVE EXAMINATION(S): Construction examinations were conducted to verify acceptability of component support installations in accordance with the applicable construction code(s). Examination records are on file by support number.

SCHEDULE FOR IMPLEMENTATION:

Preservice and Inservice Inspection.

COMMENTS/SKETCHES:

ATTACHMENT(S): ___YES ___NO

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

LOUISIANA POWER & LIGHT REQUEST FOR RELIEF

MIDDLE SOUTH UTILITIES SYSTEM

RELIEF REQ. NO. PSI-11
ATTACH. A
PAGE 1 OF 3

Component(s) - Supports listed below.
System(s) - Chilled Water (AC)
Category V - Inaccessability - Restraint access partially blocked by permanent thermal installation.

Support No.	Line No.	Code Class
ACR-453	3AC6-1A/B	3
ACR-442	3AC6-1A, 7B, 14B	3
ACR-459	3AC6-1A, 1A/B, 2B, 19A, 19B, 19A/B	3
ACR-445	3AC6-1B	3
ACV-446	"	"
ACH-475	"	"
ACR-457	3AC6-2A/B, 19A/B	3
ACR-462	3AC6-2A, 2B, 19B	"
ACR-444	3AC6-2A, 2A/B, 6B, 14B, 19A/B, 19B,	3
"	3AC6-27B, 32B	3
"	3AC10-6A, 15A, 15B	3
ACH-463	3AC6-2B, 19B	3
ACR-1041	3AC10-6A	3
ACR-1042	"	"
ACR-1059	"	"
ACR-1064	3AC10-6B	3
ACR-455	3AC8-7A	3
ACH-639	"	"
ACR-512	3AC8-7A, 14A	3
ACR-514	"	"
ACH-640	"	"
ACR-534	3AC6-7B	3
ACR-476	3AC8-7B, 14B	3
ACR-497	"	"
ACR-499*	"	"
ACR-535	"	"
ACR-536	"	"
ACR-454	3AC8-14A	3
ACR-533	3AC6-14B	3
ACR-1040	3AC10-15A	3
ACH-460	3AC6-19A/B	3
ACR-452	3AC6-19A/B, 22A/B	3
ACR-470	3AC6-21A	3
ACR-450	3AC6-21A/B	3
ACR-471	3AC6-21B	3
ACR-440	3AC6-22A	3
ACR-458	"	"
ACV-472	"	"
ACR-480	"	"
ACV-447	3AC6-22A/B	3
ACR-448	"	"
ACR-449	"	"
ACV-451	"	"

Support No.	Line No.	Code Class
ACR-1100	3AC6-22A/B	3
ACR-441	3AC6-22B	3
ACV-473	"	"
ACR-474	"	"
ACR-478	"	"
ACR-479*	"	"
ACR-516	3AC6-28B, 29B	3
ACR-517	"	"
ACR-540	"	"
ACH-541	"	"
ACR-543*	"	"
ACR-544*	"	"
ACR-560	"	"
ACR-562	"	"
ACR-564	"	"
ACR-565	"	"
ACR-566	"	"
ACH-542	3AC6-29B	3
ACR-1093	"	"
ACR-1058	3AC6-40A	3
ACR-550	3AC6-40A, 53A	3
ACR-568	3AC6-40B	3
ACR-1088	"	"
ACR-569	3AC6-40B, 43B, 49B	3
ACR-570	"	"
ACR-406	3AC6-41A, 42A	3
ACR-407	"	"
ACR-409	"	"
ACR-417	"	"
ACR-421	"	"
ACR-435	"	"
ACR-1027	3AC6-41B	3
ACR-425	3AC6-41B, 42B	3
ACR-426	"	"
ACR-427	"	"
ACR-431	"	"
ACH-432	"	"
ACR-422	3AC6-42A	3
ACR-430	"	"
ACH-434	"	"
ACR-1037	"	"
ACR-428	3AC6-42B	3
ACR-429	"	"
ACR-1019	"	"
ACR-1060	"	"
ACR-559	3AC6-43A, 209A	3
ACR-589	"	"
ACH-609	"	"

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

LOUISIANA POWER & LIGHT

MIDDLE SOUTH UTILITIES SYSTEM

REQUEST FOR RELIEF

RELIEF REQ. NO. PSI-11
ATTACH. A
PAGE 3 OF 3

Support No.	Line No.	Code Class
ACH-612	3AC6-43A, 209A	3
ACR-520	3AC6-52A	3
ACR-524	3AC6-52A, 53A	3
ACR-525	"	"
ACR-526	"	"
ACR-552	"	"
ACR-521	3AC6-53A	3
ACR-607	3AC6-209A, 210A	3
ACR-588	3AC6-209A, 210B	3
ACH-573	3AC6-209B	3
ACR-574	"	"
ACR-595	"	"
ACR-596	"	"
ACR-597	"	"
ACR-575	3AC6-209B, 210B	3
ACR-576	3AC6-210B	3
ACR-604	"	"
ACR-605	"	"

* These supports were inspected during PSI and determined to be satisfactory. Permanent insulation was installed subsequent to inspection.

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

REQUEST FOR RELIEF

LOUISIANA POWER & LIGHT

MIDDLE SOUTH UTILITIES SYSTEM

RELIEF REQUEST NO: PSI-12

COMPONENT/ITEM/SYSTEM:	CODE CLASS:	CODE CATEGORY:	ITEM NO:	SUBARTICLE
Component Supports listed on Attach A supporting system(s) as noted.	Component Supports	F-A F-B F-C	F-1 F-2 F-3 F-4	IWF-1300 IWF-2200 IWF-2400

CODE REQUIREMENT: ASME XI, 1980 ed. w/81 addenda, identifies examination boundaries for compenent supports (IWF-1300), requires that all exams be performed completely once as a preservice examination (IWF-2200), and requires that inservice examinations be completed per the component inservice inspection schedule (IWF-2400).

BASIS/JUSTIFICATION: Component support access is completely blocked by permanent (non-removable) insulation. Supported lines operate at temperatures substantially below ambient and are, therefore, subject to severe condensation. The type of insulation used has a permanently sealed vapor barrier to exclude moisture, and removal of the insulation in the support area results in vapor contamination of the surrounding insulation. Possible alternate removable type vapor barrier insulation is not acceptable due to fluoride/chloride content. The requirement for a vapor barrier necessitates permanent non-removable insulation.

ALTERNATIVE EXAMINATION(S): Construction examinations were conducted to verify acceptability of component support installations in accordance with the applicable construction code(s). Examination records are on file by support number.

SCHEDULE FOR IMPLEMENTATION:

Preservice and Inservice Inspection.

COMMENTS/SKETCHES:

ATTACHMENT(S): ___YES ___NO

LOUISIANA POWER & LIGHT
MIDDLE SOUTH UTILITIES SYSTEM

WATERFORD 3 SES

INSERVICE INSPECTION PROGRAM

REQUEST FOR RELIEF

RELIEF REQ. NO. PSI-1
ATTACH. A
PAGE 1 OF 1

Component(s) - Supports listed below.
System(s) - Chilled Water (AC).
Category VI - Inaccessibility - Restraint access completely blocked by permanent thermal insulation.

Support No.	Line No.	Code Class
ACR-513	3AC8-7A, 14A	3
ACR-515	"	"
ACR-1034	3AC10-15A	3
ACR-561*	3AC6-28B, 29B	3
ACR-563*	"	"
ACR-551	3AC6-40A	3
ACR-408	3AC6-41A, 42A	3
ACR-410	"	"
ACR-419	"	"
ACR-1036	3AC6-42A	3
ACR-1131	3AC6-43B	3
ACR-523	3AC6-52A	3
ACR-522	3AC6-53A	3

* These supports were inspected during PSI and determined to be satisfactory. Permanent insulation was installed subsequent to inspection.

ATTACHMENT II

NIS-1 FORM

PART I

FORM NIS-1 OWNERS' DATA REPORT FOR INSERVICE INSPECTIONS

As required by the Provisions of the ASME Code Rules

1. Owner Louisiana Power & Light, 142 Delaronde St., New Orleans, La. 70174
(Name and Address of Owner)

2. Plant Waterford 3 Steam Electric Station, Taft, Louisiana
(Name and Address of Plant)

3. Plant Unit 3 4. Owner Certificate of Authorization (if required) OWN-122

5. Commercial Service Date N/A 6. National Board Number for Unit See Below

7. Components Inspected

Component or Appurtenance	Manufacturer or Installer	Manufacturer or Installer Serial No.	State or Province No.	National Board No.
Steam Generator #1	Combustion Engineering	74270-1	N/A	22156
Steam Generator #2	Combustion Engineering	74270-2	N/A	22157

Note: Supplemental sheets in form of lists, sketches, or drawings may be used provided (1) size is 8½ in. x 11 in., (2) information in items 1 through 6 on this data report is included on each sheet, and (3) each sheet is numbered and the number of sheets is recorded at the top of this form.

PART II

FORM NIS-1

8. Examination Dates 10/81 to 11/81 9. Inspection Interval from Preservice Inspection

10. Abstract of Examinations. Include a list of examinations and a statement concerning status of work required for current interval.

Eddy Current examinations performed on tubing in steam generators #1 and #2 in accordance with engineering specification LOU-1564.100IE Rev. 3, dated 7/6/81, U. S. Nuclear Regulatory Commission Regulatory Guide 1.83 and Appendix IV of the 1977 Edition of ASME Section XI, including Addenda through Summer 1978.

11. Abstract of Conditions Noted.

One tube in each steam generator had a reportable indication. One tube in steam generator #1 was obstructed and the examination was not completed. Two tubes in steam generator #2 were obstructed and the examination was not completed.

12. Abstract of Corrective Measures Recommended and Taken

All five (5) tubes were plugged. Ref. C-E Traveler No. 99729515-001

We certify that the statements made in this report are correct and the examinations and corrective measures taken conform to the rules of the ASME Code, Section XI.

DATE 1/30 19 84 Signed Louisiana Power & Light By: [signature]

Certificate of Authorization No. (if applicable) OWN-122 Expiration Date 6/25/85

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and/or the State or Province of Louisiana and employed by Factory Mutual System* of Norwood, Mass. have inspected the components described in this Owner's Data Report during the period Oct. 1981 to Nov. 1981, and state that to the best of my knowledge and belief, the Owner has performed examinations and taken corrective measures described in this Owner's Data Report in accordance with the requirements of the ASME Code, Section XI.

By signing this certificate neither the Inspector nor his employer makes any warranty, expressed or implied, concerning the examinations and corrective measures described in this Owners' Data Report. Furthermore, neither the Inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this inspection.

Date 2-4-84 19___

*Arkwright-Boston Manufacturers Mutual Insurance Co.

[signature]
Inspector's Signature

Commissions NB 4122, La. 727, N-I
National Board, State, Province and Co.