

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20666

January 15, 1992

Docket No. 50-382

Mr. Ross P. Barkhurst Vice President Operations Entergy Operations, Inc. Post Office Box B Killona, Louisiana 70066

Dear Mr. Barkhurst:

SUBJECT: STATION BLACKOUT ANALYSIS - WATERFORD STEAM ELECTRIC STATION, UNIT 3 (TAC NO. M68623)

The Station Blackout (SBO) Rule requires licensees to submit information as defined in 10 CFR 50.63 and provide a plan and schedule for conformance to the SBO Rule. Entergy Operations, Inc., provided responses to the SBO Rule for the Waterford Steam Electric Station by letters from R. F. Burski dated April 14, 1989, March 30, 1990, March 21, and August 30, 1991. In addition, a teleconference was held between representatives of Entergy Operations, Inc., and the NRC staff on July 1, 1991.

Entergy's responses were reviewed by the NRC staff and by Science Applications International Corporation (SAIC) under contract to the NRC. The results of the review are documented in the enclosed Safety Evaluation (SE) (Enclosure) and the SAIC Technical Evaluation Report (TER) SAIC-91/1254, "Waterford Steam Electric Station Unit No. 3, Station Blackout Evaluation," dated December 11, 1991 (Attachment of Enclosure).

Entergy calculated a minimum acceptable SBO duration of 4 hours for Waterford Unit 3 and indicated that no modifications will be necessary to attain this coping duration. Entergy submitted its initial response in the SBO generic response format. Based on our review of that response and subsequent submittals, we find, contingent on the satisfactory resolution of the recommendations presented in this SE, that the design of Waterford conforms with the SBO Rule, the guidance of Regulatory Guide (RG) 1.55, Nuclear Management and Resources Council (NUMARC) 87-00, and NUMARC 87-00 Supplemental Questions/Answers and Major Assumptions, dated December 27, 1989 (issued to the industry by NUMARC on January 4, 1990). Entergy should submit, within 30 days of receipt of this SE, confirmation of the resolution of these recommendations and present a schedule for their implementation in accordance with 10 CFR 50.63(c)(4).

In addition, the following areas may require follow-up inspection by the NRC to verify that the implementation of any modifications and the supporting documentation which Entergy may propose as a result of this evaluation are adequate to meet the SBO Rule. The NRC is developing guidance for this follow-up inspection to verify the following:

a. Hardware and procedural modifications;

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- SBO procedures in accordance with RG 1.155, Position 3.4, and b. NUMARC 87-00, Section 4;
- Operator staffing and training to follow the identified actions in C. the procedures:
- d. Emergency Diesel Generator reliability program meets, as a minimum, the guidelines of RG 1.155;
- e. Equipment and components required to cope with an SBO are incorporated in a Quality Assurance program that meets the guidance of RG 1.155, Appendix A; and
- f. Actions taken pertaining to the specific recommendations noted in the SE.

The guidance provided on Technical Specifications (TS) for SBO blates that the TS should be consistent with the Interim Commission Policy Statement on TS. We have taken the position that TS are required for the SBO response equipment. However, the question of how specifications for the SBO equipment will be applied is currently being considered generically by the NRC in the context of the Technical Specification Improvement Program and remains an open item at this time. In the interim, we expect plant procedures to reflect the appropriate testing and surveillance requirements to ensure the operability of the necessary SBO equipment. If the NRC later determines that TS regarding SBO equipment is warranted, Entergy will be notified of the implementation requirements.

The SE contains nine recommendations. Entergy is requested to confirm implementation of these recommendations, including a schedule for their completion, within 30 days. This requirement affects fewer than 10 respondents and, therefore, is not subject to Office of Management and Bur let review under Public Law 96-511. If there are any question, please let us know.

Sincerely,

David L. Wigginton, Senior Project Manager Project Directorate 1/-1

Division of Reactor Projects - III/IV/V Office of Nuclear Reactor Regulation

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- SBO procedures in accordance with RG 1.155, Position 3.4, and NUMARC 87-00, Section 4;
- Operator staffing and training to follow the identified actions in the procedures;
- d. Emergency Diesel Generator reliability program meets, as a minimum, the guidelines of RG 1.155;
- e. Equipment and components required to cope with an SBO are incorporated in a Quality Assurance program that meets the guidance of RG 1.155, Appendix A; and
- f. Actions taken pertaining to the specific recommendations noted in the SE.

The guidance provided on Technical Specifications (TS) for SBO states that the TS should be consistent with the Interim Commission Policy Statement on TS. We have taken the position that TS are required for the SBO response equipment. However, the question of how specifications for the SBO equipment will be applied is currently being considered generically by the NRC in the context of the Technical Specification Improvement Program and remains an open item at this time. In the interim, we expect plant procedures to reflect the appropriate testing and surveillance requirements to ensure the operability of the necessary SBO equipment. If the NRC later determines that TS regarding SBO equipment is warranted, Entergy will be notified of the implementation requirements.

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Sincerely,

SITO BY

David L. Wigginton, Senior Project Manager Project Directorate IV-1 Division of Reactor Projects - III/IV/V Office of Nuclear Reactor Regulation

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