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June 8, 1984

ROTH S. LEDDICK Senior Vice President Nuclear Operations

> W3P84-1590 3-A1.01.04

Mr. Darrell G. Eisenhut, Director Division of Licensing Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

SUBJECT: Waterford SES Unit 3

Docket No. 50-382

Waterford Unit 3 Technical Specifications

Letter of Certification

REFERENCE: USNRC Letter Dated April 19, 1984, D.G. Eisenhut to R.S. Leddick

USNRC Letter Dated May 30, 1984, G.W. Knighton to R.S. Leddick

Dear Mr. Eisenhut:

Your letter of April 19, 1984 forwarded the Final Draft form of the Waterford Unit 3 Technical Specifications to LP&L. Further, your letter requested that the draft be reviewed and that LP&L submit a letter certifying the accuracy of the draft in a timely manner to support license issuance. Subsequently, by letter dated May 30, 1984, your staff transmitted revised pages for the Waterford 3 Technical Specifications which reflected editorial and typographical changes as well as resolution of issues in the areas of reactor systems, emergency feedwater system operations and ESFAS relay testing.

The adequacy and accuracy of the Waterford 3 Technical Specifications has been established through the attention, involvement, and interaction of the NRC and LP&L during the preparation process over nearly the last three (3) years. However, to bolster the confidence level of the accuracy of our Technical Specifications and to support the NRC requested certification. LP&L has completed an intensive review/reverification program. Based on the results of this program we are confident that the proposed Technical Specifications adequately validate the accident analyses assumptions and are an accurate reflection of the as-built plant, the FSAR, and the Safety Evaluation Report (SER) as supplemented.

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Page 2 W3P84-1590 D.G. Eisenhut

As directed by your letter of April 19, 1984, this letter affirms and certifies that to the best of my knowledge, the draft Technical Specifications transmitted by the reference letters accurately reflect the plant, the FSAR and the SFR analyses.

As pointed out in your April 19th and May 30th letters, there are issues which remain to be resolved and which may require changes to the Technical Specifications. We will work closely with your staff to reach mutual resolution on these or any other changes necessary to the final draft Technical Specifications through appropriate licensing channels.

A revision to our Technical Specifications transmitted via your May 30, 1984 letter involved a substantive change to the ESFAS Subgroup Relay Channel Functional Test frequency. LP&L does not believe that there is a defined technical basis for the increased test frequency and intends to pursue this matter further with your staff.

Should you require additional information or desire further discussions on the Waterford 3 Technical Specifications, please do not hesitate to contact me.

Very truly yours,

RSL/WAC/ch

cc: E.L. Blake, W.M. Stevenson, G.W. Knighton, J.T. Collins, D.M. Crutchfield, J. Wilson, G.L. Constable

STATE OF LOUISIANA)

SS

PARISH OF ORLEANS )

I, R.S. Leddick, being duly sworn, subscribe to and say that I am the Senior Vice President-Nuclear Operations; that I have full authority to execute this oath; that I have read the foregoing Technical Specifications Certification Letter and know the contents thereof; and that to the best of knowledge, information, and belief the statements made in it are true.

R. S. Leddick

SUBSCRIBED AND SWORN to before me, a Notary Public, in and for the Parish and State above named, this day of JUNE, 1984.

Notary Publ