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November 21, 1984

W3P84-3246 3-A1.01.04 A4.05

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

SUBJECT: Waterford SES Unit 3 Docket No. 50-382 Implementation of Regulatory Guide 1.97 Revision 2

REFERENCE: LP&L Letter W3I83-0177

Dear Sir:

Louisiana Power & Light described in the referenced letter the post-accident instrumentation provided for Waterford 3 in accordance with Regulatory Guide 1.97, Revision 2. LP&L noted in the referenced letter that for the Type B Category I variable, RCS pressure, instrumentation was installed to cover the range 0-3000 psig.

The installed instrument pressure range is sufficient to cover the Waterford 3 FSAR Chapter 15 events. LP&L, as noted in Reference (1), therefore believed that the present RCS pressure range provided for Waterford 3 was adequate pending resolution of the ATWS issue. However, in the recent ATWS rulemaking, ATWS prevention rather than mitigation (which would have defined peak ATWS pressures and, therefore, instrumentation ranges), was addressed. Given the uncertainty over resolution of the ATWS mitigation issue, LP&L at this time provides the following clarification to the deviation from Regulatory Guide 1.97, Revision 2.

Prior to startup following the first refueling outage at Waterford 3, LP&L will either:

 Provide a commitment to install category I instrumentation for RCS pressure range indication consistent with RG 1.97, Revision 2; such a change would be implemented on a schedule consistent with other hardware changes to be made in accordance with the ATWS rulemaking, or

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2. Provide the NRC with an acceptable justification for maintaining RCS pressure indication in the range 0-3000 psig.

Please contact R.J. Murillo if there are any questions on this letter.

Very truly yours,

FW Cook

K. W. Cook Nuclear Support & Licensing Manager

KWC/RJM/ch

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