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Director
Nuclear Safety
Waterford 3

W3F192-0303
A4.05
QA

July 23, 1992

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Technical Specification Change Request NPF-38-122
Additional Information

Gentlemen:

Per your request the following additional information is being provided concerning the subject Technical Specification Change Request.

In accordance with Generic Letter 91-08 "Removal of Component Lists from Technical Specifications" TS 4.8.4.1.a.2 was revised to include a note from table 3.8.1 (note II.6 page 3/4 8-51b) which constitutes an exception to the TS requirement. TS 4.8.4.1.a.2 concerns the functional testing of lower voltage circuit breakers and states that the test "shall consist of injecting a current in excess of the breaker's nominal setpoint and measuring the response time." This test method is not applicable for the General Electric low voltage (480 volt) power circuit breakers as these breakers are equipped with external solid-state overcurrent trip devices. The staff questioned if "Channel Calibration" could be used to describe the test performed on these breakers. The answer is no. These breakers are subjected to a functional test in accordance with General Electric's recommendations rather than a channel calibration. In responding to your question it was observed where the existing TS note is misleading in that it refers to testing in accordance with the "vendor's calibration procedures". Testing of these specific breakers per TS 4.8.4.1.a.2 is actually performed in accordance with Waterford 3 Maintenance Electrical Procedure ME-003-314, "General Electric ECS and SST Programmers" which is based on the manufacturers recommendations. Therefore, the asterisk note on our proposed TS change (page 3/4 8-17) should be clarified by removing the reference to "vendor's calibration procedures" and inserting "manufacturer's recommendations". In

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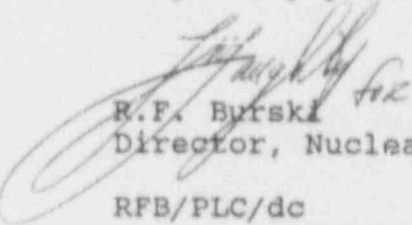
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addition, the exception which states "...external protective relays," should be clarified by stating "...external trip devices," which is consistent with the descriptor used by the manufacturer.

Should you have any additional concerns regarding this issue, please contact Paul Caropino at (504) 739-6692.

Very truly yours,


R.F. Burski
Director, Nuclear Safety

RFB/PLC/dc

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