



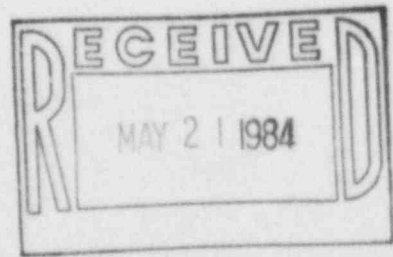
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POWER & LIGHT**

142 DELARONDE STREET
P. O. BOX 6008 • NEW ORLEANS, LOUISIANA 70174 • (504) 386-2345

May 17, 1984

W3P84-1408
3-A1.01.04
3-A1.16.07

Mr. John T. Collins
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011



SUBJECT: Waterford 3 SES
Docket No. 50-382
Inspection Report 83-22 Item 2

Dear Sir:

The subject inspection report open item (382/8322-02) proposes that Waterford 3 complete additional ALARA reviews for the gaseous and liquid radioactive waste systems to the recommendations of ANSI-55.4 - 1979 and ANSI-55.6 - 1979 respectively.

We do not feel that such additional reviews are justified. Note that these two ANSI standards are dated 1979, substantially into the design and construction cycle of the plant. Subsequently, Waterford 3 was not designed and constructed to these standards nor were we ever committed to these standards. As noted in our SER, NUREG-0787, July 1981, Section 11.2.1.6, we have complied with Regulatory Guide 1.143. This regulatory guide refers to the aforementioned ANSI standards and states that they provide more detailed guidance but does not endorse them.

More important is the fact that Waterford 3 has performed extensive ALARA reviews on the gaseous and liquid radwaste systems as well as other systems using the guidance of Regulatory Guide 8.8. These reviews have resulted in significant modifications to plant systems where deemed cost-effective. Additionally, other items have been identified for follow-up evaluation after plant startup. All problems identified during plant operation will be evaluated and design modifications will be implemented where deemed necessary in accordance with our ALARA Program.

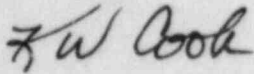
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In summary, although these ANSI standards have not been complied with to the letter, they are not a regulatory design basis for the Waterford 3 Station (both in our view and NRR's) plus adequate measures have already been taken to keep exposures and releases as-low-as-reasonably-achievable. We feel this open item should be closed.

Very truly yours,



K. W. Cook
Nuclear Support & Licensing Manager

KWC/JKS/ch

cc: E.L. Blake, W.M. Stevenson, J.T. Collins, D.M. Crutchfield, J. Wilson,
G.L. Constable, R.E. Baer, NRC Region IV