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November 6, 1984

W3P84-3029
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A4.05

Director of Nuclear Reactor Regulation
Attention: Mr. G.W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

REFERENCE: LP&L Letter W3I83-0177 dated July 6, 1983

Dear Sir:

The above referenced letter describes LP&L's implementation of Regulatory Guide 1.97 Revision 2 at Waterford 3. The purpose of this letter is to inform the NRC of a clarification and exception regarding control room indication information provided in the referenced letter.

In clarification of the reference submittal, indication for two of the variables listed in the referenced report is provided in the control room through display by the plant computer. The monitoring of the respective variables by the plant computer is acceptable since the accomplishment of the component function can be inferred by other variables indicated in the control room should the plant computer be unavailable. Specific details are provided in the attachment to this letter.

If you have any questions, please feel free to contact me or Robert J. Murillo.

K.W. Cook
Nuclear Support & Licensing Manager

KWC/RJM/pcl

Attachment

cc: E.L. Blake, J. Wilson, R.W. Stevens, G.L. Constable

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ATTACHMENT 1

LP&L Clarification and Exception
To Previously Submitted Position
On Regulatory Guide 1.97, Revision 2

1. ITEM 1: Containment Isolation Valve Position

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Applicable Variable: Containment Isolation Valve Position

Clarification: Under the "display" column of the report, it may be implied that qualified control room indication is provided for all containment isolation valve positions. Containment to Annulus DPT containment header valves (CVR-401A (2HV-E634A) and CVR-401B (2HV-E633B) open and closed positions are not independently indicated in the control room but rather are monitored and displayed by the plant computer, as indicated in the "notes" column of the LP&L report.

Discussion: Penetrations 53 and 65 each contain two instrument lines. One instrument line senses differential pressure across the containment vessel and provides a signal to activate the vacuum relief system. The other instrument line monitors this differential pressure and provides an input to the plant computer. One containment to annulus DPT containment header valve is installed in each monitoring instrument line. The valves fail in the safe (closed) position and are actuated closed on a containment isolation signal. Each differential pressure monitoring instrument line is also provided with an excess flow check valve which is designed to close on excess flow and reopen when conditions return to a specified normal state. Both the actuation and monitoring instrument lines form a closed system outside containment, are seismically qualified, and terminate in an area exhausted by the filters of the Controlled Ventilation Area System. Therefore, these valves do not constitute potential breaching of containment, and the valves are not considered isolation valves relative to Regulatory Guide 1.97, Revision 2. This position has been previously provided to the NRC in LP&L's response to FSAR questions numbered 480.36 and 480.37.

2. ITEM 2: Emergency Ventilation Damper Position

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Applicable Variable: Emergency Ventilation Damper Open-Closed Position

Exception: Under the "Display" column of the report, it may be implied that qualified Emergency Ventilation Damper open-closed position is indicated in the control

room. Qualified open-closed indication position is not provided in the control room for Containment Fan Cooler Safety Discharge Dampers A (CCS-102A) D-69 and B (CCS-102B) D-70 and Emergency Filtration Units Recirculation Dampers (D-41) HVC-213A and HVC-213B, but rather open-closed positions for these dampers are monitored and displayed by the plant computer.

2.a. Discussion: Containment Fan Cooler Safety Discharge Dampers.

Containment Fan Cooler Safety Discharge Dampers A and B are each installed in respective completely redundant cooling trains of the ventilation system. The dampers are fail-open dampers, and each damper receives an open signal on a SIAS. The open-not open positions of these dampers are monitored by the plant computer.

Differential pressure indication across each fan cooler is provided in the control room. Thus in the event that one of the dampers had failed to open, the plant computer damper open-not open position indication was not available, and the non-safety related ductwork was also blocked, the operator could determine damper position by noting increased differential pressure across the affected containment fan cooler.

2.b. Discussion: Emergency Filtrations Units Recirculation Dampers.

Emergency Filtration Unit Recirculation Dampers (D-41) - HVC-213A and HVC-213B are installed in each redundant train of the control room emergency air handling units. These dampers receive an open signal on SIAS and fail in the open position. The open or not-open positions of these dampers are monitored by the plant computer.

In the event that damper open or not-open plant computer indication was not available, the damper open or not-open position could be inferred by the following two methods.

The fans (S8(3A-SA) and S8(3B-SB)) which draw flow through the emergency filtration units are interlocked with the close limit switches on the respective damper. Hence unless the damper is at least partially open, the fan will not be able to start. Red or green fan motor status lights are provided in the control room to indicate fan operational status.

Alternatively, differential pressure is monitored in each filter train, and differential pressure is indicated in the control room. In the event that the damper had failed to completely open, a low differential

pressure would exist in the affected train, and indication would be shown in the control room. The respective damper units are in close proximity to the control room on the 46' elevation, and therefore quickly accessible by plant personnel.