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U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

In the Matter of
Louisiana Power & Light Company
(Waterford Steam Electric Station, Unit 3)
Docket No. 50-382-06

Dear Commissioners:

This refers to my letter to you of March 12, 1985 on behalf of Louisiana Power & Light Company concerning the schedule for considering and implementing full-power operating authority for Waterford 3. That letter was prompted by Joint Intervenors' letters to you dated March 8 and 11, 1985, in which they requested that the Commission defer its decision on full-power operation and defer the immediate effectiveness of any such decision in order to allow them time to seek court review.

Attached for your consideration is the affidavit of Ross P. Barkhurst, Waterford 3 Plant Manager. The affidavit describes the power ascension testing program to be performed at levels above 5% of rated power and demonstrates that any delay in the

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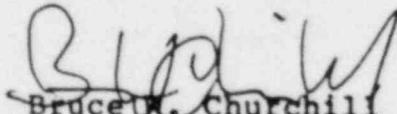
issuance of full-power operating authority will result in a commensurate, day-for-day delay in the commercial operation of Waterford 3. Each day of unnecessary delay results in significant detriment to Applicant and the public it serves. The cost is estimated to be over \$1,000,000 for each day of delay.

With respect to Joint Intervenors' request for a "grace period" within which to seek review in the courts, the description of the power ascension program illustrates that there would be no significant public health and safety consideration resulting from allowing Applicant to begin its power ascension program during the short period of time within which Joint Intervenors might seek court review. The plant successfully completed its low power testing program on March 11, and is ready for power ascension. As shown in Mr. Barkhurst's affidavit, power ascension is gradual and intermittent, and the program is projected to require 104 days to complete. During the first 12 days, power is gradually increased, and does not exceed 20% of full power. Full power is not even reached until 84 days after the start of the program. Considering the care and rigor with which each step is evaluated and problems corrected before proceeding to the next step, these periods could be even longer.

The Waterford 3 safety analysis shows that the plant meets the Commission's requirements under full-power operation and with full-term fission product inventories. As with the previously authorized 5% power operation, the fission product inventory developed during the first 12 days, when power does not exceed 20% of full power, is a very small fraction of the full-term, full-power inventory for which the plant has been successfully evaluated.

Immediate effectiveness of operating authority would not preclude Joint Intervenors from seeking court review. Given a Commission determination that Waterford 3 is ready for safe operation at full-power, there would be no public health and safety reason for delaying such operating authority for even a brief period for Joint Intervenors to seek court review. As noted, any further delay will be severely costly to Applicant and the ratepaying public.

Sincerely yours,


Bruce C. Churchill
Counsel for Applicant

cc: Service List (attached)