

LOUISIANA
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June 6, 1985

ROTH S. LEDDICK
Senior Vice President
Nuclear Operations

W3P85-2105
3-A1.01.04
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.

SUBJECT: Waterford SES Unit 3
Docket No. 50-382
Technical Specification Change Requests
NPF-38-02, NPF-38-03

Dear Sir:

Louisiana Power & Light hereby files an application for two amendments to the Waterford 3 Technical Specifications. The first amendment, NPF-38-02, involves the addition of four smoke detectors in the Reactor Auxiliary Building. The second amendment, NPF-38-03, clarifies the identifying numbers of three containment isolation valves. The enclosed proposed changes do not involve an unreviewed safety question nor a significant hazards consideration.

Should you have any questions or require additional information concerning these requested changes, please contact Mike Meisner at (504) 595-2832.

Yours very truly

R.S. Leddick
Senior Vice President
Nuclear Operations

RSL/MJM/ch

Enclosures: NPF-38-02
NPF-38-03

cc: B.W. Churchill, W.M. Stevenson, R.D. Martin, D.M. Crutchfield,
J. Wilson, T.A. Flippo, Administrator Nuclear Energy Division
(State of Louisiana)

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

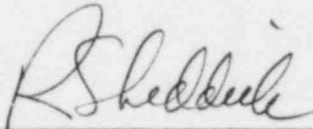
In the matter of)

Louisiana Power & Light Company)
Waterford 3 Steam Electric Station)

Docket No. 50-382

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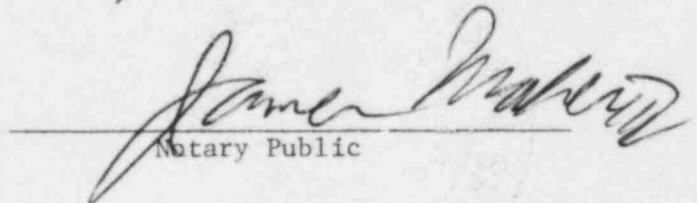
R. S. Leddick, being duly sworn, hereby deposes and says that he is Senior Vice President - Nuclear Operations of Louisiana Power & Light Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.



R.S. Leddick
Senior Vice President
Nuclear Operations

STATE OF LOUISIANA)
) ss
PARISH OF ST. CHARLES)

Subscribed and sworn to before me, a Notary Public in and for the Parish
and State above named this 6th day of June, 1985.


Notary Public

My Commission expires

at death

NPF-38-02

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-02

This is a request to revise Table 3.3-11 "Fire Detection Instruments" of Technical Specification 3.3.3.8 "Fire Detection Instrumentation" to add four Function B smoke detectors.

Existing Specification

See Attachment "A"

Proposed Specification

See Attachment "B"

Description

Technical Specification 3.3.3.8 addresses the operability requirements for fire detection instrumentation provided to ensure adequate warning and prompt fire detection. Table 3.3-11 lists the instrumentation necessary to ensure this function. Of that list, Function B instruments provide actuation of fire suppression systems as well as early warning and notification.

The proposed change will revise the number of Function B smoke detectors in the Reactor Auxiliary Building Zone 27C of Technical Specification Table 3.3-11. The number of detectors will be increased from 2 to 6 as the result of recent station modifications. The modifications arise from two sources:

1. As reported in Licensee Event Report #LER-85-012-00 (W3P85-1241 dated April 30, 1985) one section of fire zone RAB 27C contained pre-action automatic sprinklers without associated Function B detectors. As a corrective action, two Function B detectors have been installed and should be added to Table 3.3-11.
2. Also in fire zone RAB 27C physical modifications have been made creating new barriers that required installation of two new Function B detectors in accordance with the Waterford 3 Fire Protection Program. These detectors should be added to Table 3.3-11.

Safety Analysis

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

Response: NO

The proposed change is consistent with the fire hazards analysis detailed in the Waterford 3 FSAR Section 9.5.1. Therein, fire zone RAB 27C was evaluated to require ionization type detectors to activate the pre-action sprinkler system and alarm locally and in the control room. The proposed change increases the level of fire protection over that existing without detector installation and maintains the level of protection required by the Waterford 3 Fire Protection Program. Therefore, the proposed change will not involve an increase in the probability or consequences of any accident previously evaluated.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: NO

Under the Waterford 3 Fire Protection Program a fire in fire zone RAB 27C has been previously analyzed to require Function B smoke detection. The proposed change supports this analysis through addition of the requisite detectors. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: NO

By adding four new detectors the proposed change will maintain the level of protection specified in Waterford 3 Fire Protection Program. Therefore, the proposed change will not involve a reduction in a margin of safety.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (ii) relates to a change that constitutes an additional limitation, restriction or control not presently included in the Technical Specifications.

In this case, the Waterford 3 Fire Protection Program is consistent with Appendix A to Branch Technical Position APCSB 9.5-1 Revision 0. In order to implement the results of the Fire Protection Program's fire hazards analysis for fire zone RAB 27C it is necessary to increase the Function B detection, which constitutes an additional control not presently included in the Technical Specifications. Therefore, the proposed change is similar to example (ii).

Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10CFR50.91; and (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

ATTACHMENT A