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March 3, 1988

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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
Partial Exemption from 10CFR50, Appendix J

Gentlemen:

In accordance with 10CFR50, Appendix J, Section III.A.1(a) if, during the performance of a Type A Containment leakage test, potentially excessive leakage paths are identified which may interfere with the satisfactory completion of the test, or which may result in the test not meeting the appropriate acceptance criteria, the test shall be terminated and the leakage paths measured, repaired and/or adjusted in accordance with local leakage testing. The Type A test may then be re-performed.

An engineering evaluation of the test method described above indicates that a delay of at least twenty-four (24) hours may result from the termination of the test. The largest part of the delay can be attributed to depressurizing and repressurizing the containment (approximately 16 hours with an additional 4 hours for temperature stabilization). Louisiana Power & Light (LP&L) is proposing to alter the manner in which the above test is performed at Waterford 3. It is our belief that the termination of the test poses an unnecessary delay to the Integrated Leak Rate Test (ILRT) schedule. As an alternative, we propose that the requirement to terminate the test be waived, and that any leaks, should they occur, be isolated, and following the completion of the Type A test, measured, repaired and/or adjusted as appropriate. The leakage rates would then be added such that an "as found" and "as left" Type A leakage could be determined.

The alternate test method proposed above poses no decrease in the margin of safety already assured by current testing, and will not present an undue risk to public health and safety. It would simply remove the requirement to terminate the ILRT, and allow plant personnel to measure, repair and/or adjust the leakage following the completion of the test. The method proposed is the method recommended in ANSI/ANS-56.8-1981 Section 3.2.6(a).

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10CFR50.12, Special Exemptions, allows the Commission to grant exemptions under special circumstances. For this proposal, the special circumstances outlined in 10CFR50.12(a)(2)(ii) and 10CFR50.12(a)(2)(iii) would apply. In 10CFR50.12(a)(2)(ii) an exemption can be granted if application of the regulation is not necessary to achieve the underlying purpose of the rule. In this particular case the specific requirement to terminate the Type A test, measure, repair and/or adjust any leakage, and then re-perform the Type A test is not necessary to reasure integrated containment leakage. In 10CFR50.12(a)(2)(iii) an exemption can be granted if compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted. In this case depressurization, repressurization, and temperature stabilization could unduly delay an outage at Waterford 3 for at least twenty-four hours. The test method proposed above would in no way affect the results of the Type A test and greatly improve the time needed to perform the ILRT. LP&L, therefore, requests an exemption from the requirement to terminate a Type A test for those conditions outlined in Section III.A.1(a) of 10CFR50, Appendix J.

If you have any questions or wish to discuss this matter further please feel free to call me or Mr. Larry Laughlin at (504) 595-2845.



R.F. Burski
Acting Manager
Nuclear Safety & Regulatory Affairs

RFB/LWL/plm

cc: E.L. Blake, W.M. Stevenson, J.A. Calvo, D.L. Wigginton, R.D. Martin,
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