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Early C. Ewing, III  
Director  
Nuclear Safety & Regulatory Affairs  
Waterford 3

W3F1-97-0139  
A4.05  
PR

May 30, 1997

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  
Mode Restraint for RG 1.97 Supplemental Response

Gentlemen:

On May 23, 1997, Waterford 3 submitted a supplemental response to our 1991 RG 1.97 submittal. This supplemental response added position indicators for a number of remotely-operated, non-automatic containment isolation valves (CIVs) to the scope of RG 1.97 instrumentation. These indicators were not previously considered to fall under the scope of RG 1.97 as explained in the supplemental response. As described in the supplemental response, three of the CIVs (MS-116A, MS-116B, and CVC-209) do not possess RG 1.97 qualified position indication in the control room. Waterford 3 has requested the NRC's approval for deviation from RG 1.97 based on the non-qualified indication for these valves, alternate means of indication, and compensatory measures. Waterford 3 is currently in MODE 5, starting up from Refueling Outage 8, and believes that entry into MODE 4 is contingent upon the NRC's approval of these deviations from RG 1.97. This is based on the fact that TS 3.3.3.6, "Accident Monitoring Instrumentation," requires position indication for RG 1.97 Category 1 CIVs. The addition of the position indicators listed in the supplemental response to the scope of RG 1.97 results in the requirements of TS 3.3.3.6 being applicable to these indicators. Without RG 1.97 qualified position indication for the three valves mentioned above, or NRC approval for deviation from the RG, entry into MODE 4 would result in violating TS 3.3.3.6, although there is no shutdown requirement for this TS (Action 29 provides an Allowed Outage Time of 30 days and requires a subsequent 14-day Special Report). Due to the above, Waterford 3 is requesting an expeditious NRC review and approval of the

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supplemental RG 1.97 response submitted on May 23, 1997. The current projected date for MODE 4 entry is June 7, 1997.

Should you have any questions concerning the above please contact me at (504) 739-6242.

Very truly yours,

A handwritten signature in black ink, appearing to be 'E.C. Ewing', with a long horizontal flourish extending to the right.

E.C. Ewing

Director

Nuclear Safety & Regulatory Affairs

ECE/DFL/ssf

cc: E.W. Merschoff, NRC Region IV  
C.P. Patel, NRC-NRR  
J. Smith  
N.S. Reynolds  
NRC Resident Inspectors Office