

#### UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

SUPPLEMENTAL SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

# CONFORMANCE TO REGULATORY GUIDE 1.97

## ENTERGY OPERATIONS, INC.

### WATERFORD STEAM ELECTRIC STATION, UNIT 3

### DOCKET NO. 50-382

### 1.0 INTRODUCTION

On July 12, 1993, the Nuclear Regulatory Commission (NRC) issued a Supplemental Safety Evaluation Report regarding Entergy Operations, Inc.'s conformance to Regulatory Guide (RG) 1.97, Revision 3, for the Waterford Steam Electric Station, Unit 3. The NRC staff accepted the licensee's deviations from the guidance in RG 1.97. In a letter dated May 23, 1997, as supplemented by letter dated May 30, 1997, the licensee requested additional deviations from the RG 1.97 recommendations for containment isolation valve position monitoring.

#### 2.0 EVALUATION

RG 1.97 recommends Category 1 position indication instrumentation for containment isolation valves. The licensee's position indication instrumentation for seven containment isolation valves do not meet the Category 1 criteria.

Containment spray riser check valve bypass valves CVC-129A and CVC-129B are normally closed and fail closed on loss of power. These valves have local position indication, are administratively controlled, and remain closed during accident conditions. Since these valves are normally closed and are administratively controlled, Category 1 position indication is not required, and therefore, this deviation is acceptable.

Steam generator nitrogen supply valves NG-412A and NG-412B are normally locked closed. These valves have Non-Category 1 control room position indication and are administratively controlled. Since these valves are normally locked closed and are administratively controlled, Category 1 position indication is not required, and therefore, this deviation is acceptable.

Main steam atmospheric dump valves MS-116A and MS-1168 are normally closed and fail closed on loss of actuator power. These valves have Non-Category 1 control room indication. The licensee has stated that the accomplishment of

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9706090242 970605 PDR ADOCK 05000382 P PDR the containment isolation function of these valves can be determined by monitoring steam generator pressure and radiation releases on the reactor building roof near these valves. Since the operator has alternative means of determining the accomplishment of the containment isolation function of these valves, Category 1 position indication is not required, and therefore, this deviation is acceptable.

Charging system header containment isolation value CVC-209 has Non-Category 1 control room position indication. The licensee has committed to install Category 1 position indication for this value during Refueling Outage 9. Until this new instrumentation is installed, the licensee has provided administrative controls to manually shut manual isolation value CVC-208 which is in series with CVC-209. CVC-208 has local mechanical position indication and is accessible post-accident. Since administrative controls are in place to be able to manually isolate CVC-208 to provide the containment isolation function, Category 1 position indication is not required, and therefore, this deviation is acceptable until Refueling Outage 9.

#### 3.0 CONCLUSION

Based on staff's review of the licensee's submittal, the staff concludes that the licensee has provided adequate justification for deviations from RG 1.97, Revision 3, for the instrumentation that monitors containment isolation valve position at the Waterford Steam Electric Station, Unit 3. Therefore, the staff finds the licensee's post-accident monitoring instrumentation in conformance with the guidance of RG 1.97, Revision 3.

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