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MIDDLE SOUTH UTILITIES SYSTEM

January 28, 1988

J. G. DEWEASE
SENIOR VICE PRESIDENT
NUCLEAR OPERATIONS

W3P88-0160
A4.05
QA

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

SUBJECT: **Waterford SES Unit 3**
Docket No. 50-382
Technical Specification Change Requests NPF-38-73 and NPF-38-74

Dear Sir:

Louisiana Power & Light hereby files an application for an amendment to the Waterford 3 Technical Specifications regarding the Reactor Protective Instrumentation and Shutdown Cooling Flow.

In NPF-38-73, testing of the log power level trip is clarified as discussed with the Waterford 3 Resident Inspector. The amendment requested in NPF-38-74 would allow reduction of shutdown cooling flow in Mode 6 to minimize the potential for a loss of shutdown cooling due to vortexing. This change is consistent with the guidance of (and Waterford 3 commitments in response to) Generic Letter 87-12. Waterford 3 will enter Mode 6 early in the second refueling outage currently scheduled for the beginning of April, 1988. Your timely review of NPF-38-74 is requested to support this schedule.

The enclosed amendments do not involve an unreviewed safety question nor a significant hazards consideration. Should you have any questions or require additional information concerning the proposed changes, please contact Larry Laughlin at (504) 595-2845.

Yours very truly,

J.G. Dewease
Senior Vice President
Nuclear Operations

JGD/LWL/plm

Enclosures: NPF-38-73
NPF-38-74
Filing Fee - LP&L check for $150.00

cc: E.L. Blake, W.M. Stevenson, J.A. Calvo, J.H. Wilson, R.D. Martin,
NRC Resident Inspector's Office (W3)

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of	)	
	)	
Louisiana Power & Light Company	)	Docket No. 50-382
Waterford 3 Steam Electric Station	)	

AFFIDAVIT

J.G. Dewease, 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 Requests; 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.

J.G. Dewease
Senior Vice President
Nuclear Operations

STATE OF LOUISIANA)
) ss
PARISH OF ORLEANS)

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 28th day of January, 1988.

Notary Public

My Commission expires life.

NPF-38-73

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-73

This is a request to revise Technical Specification 3/4.3.1, Reactor Protection Instrumentation.

Existing Specification

See Attachment A.

Proposed Specification

See Attachment B.

Description

The proposed change would revise a portion of the operabililty and surveillance requirements associated with Technical Specification 3/4.3.1, Reactor Protective Instrumentation. Technical Specification 3/4.3.1 currently, among other things, requires the Logarithmic Power (Log Power) Level - High Channels to be operable in modes 1 and 2. The proposed change would remove the operability as well as surveillance requirements for Log Power Channels when reactor thermal power is above 1.0E-4% of rated thermal power.

The bases for the Log Power Level - High trip is to protect the integrity of the fuel cladding and the Reactor Coolant System pressure boundary in the event of an unplanned criticality from a shutdown condition. In order to operate above 1.0E-4% reactor thermal power, plant operators must bypass the Log Power Level - High trip. Therefore, the requirement for the channels to be operable above 1.0E-4% reactor thermal power is inappropriate.

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 the 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 intent of the Logarithmic Power trip is to protect the integrity of the fuel cladding and the Reactor Coolant System pressure boundary in the event of an unplanned criticality from a shutdown condition. When increasing reactor power following a shutdown, plant operators must bypass the Log Power Trip in order to increase reactor power above 1.0E-4%. By doing this, the Log Power Channels will be removed from the reactor trip logic. The proposed change will remove the operability requirements for the instrumentation when the trip is bypassed (above 1.0E-4% reactor power). The proposed change will not, however, affect the operability and surveillance requirements when reactor power is below 1.0E-4%. Therefore, removing the operability and surveillance requirements above 1.0E-4% reactor thermal power does not increase 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.

   The operability and surveillance requirements will remain in effect below 1.0E-4% reactor thermal power; therefore, the design basis of the instrumentation will not be affected. There has been no physical change to plant structures, systems or components. Thus, 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 the margin of safety?

   Response: No.

   The intent of the Log Power trip is to prevent a power excursion during shutdown conditions as a result of an unplanned criticality. The proposed change will not affect the ability of the instrumentation to perform its intended function. Therefore, the proposed change will not result in a significant reduction in the margin of safety.

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 10 CFR 50.92(c); (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.