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May 11, 1988

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

SUBJECT: **Waterford SES Unit 3**
Docket No. 50-382
Supplemental Response to Generic Letter 83-28, Item 1.2
Post-Trip Review - Data and Information Capability

REFERENCES: (1) NRC Draft Technical Evaluation Report dated 4/06/88 from D.L. Wigginton to J.G. Dewease

(2) LP&L Letter W3P84-0288 dated 2/06/84 from K.W. Cook to G.W. Knighton

(3) LP&L Letter W3P85-2697 dated 10/15/85 from K.W. Cook to G.W. Knighton

Gentlemen:

In response to Reference 1 and the discussions held during a conference call between LP&L and the NRC on 4/18/88, the following information is being provided to supplement the data that was submitted previously with regard to the subject Generic Letter 83-28 Item.

Based on the review criteria that were developed for the requirements of Item 1.2, it was found that six of the recommended minimum set of parameters were not monitored at Waterford 3 by either the Sequence of Events (SOE) or Time History (TH) Recorder Programs. A list of the parameters that are monitored by these Programs was provided in the Reference 2 letter. Additional information for each parameter that was noted as not being monitored is provided in Attachment 1. This information demonstrates that the necessary data for these parameters will be available for subsequent use in post-trip reviews (PTR).

Another area of concern was the minimum performance characteristics of the TH recorders, specifically involving the sample interval and period for recording the data. For Waterford 3 each analog TH recorder data point

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for the minimum set of parameters provided in Reference 1 is recorded on two separate TH directories both of which were provided in Reference 2. The first directory maintains the selected parameter data at a sample interval of 2 seconds for a period of 60 seconds prior to the trip and 60 seconds after the trip (Note: the 60 second periodicity is an increase from the period that was provided previously by Reference 2). The second directory provides the data at a sample interval of 30 seconds for a period of 5 minutes pre-trip and 5 minutes post-trip. In addition to this recording frequency capability, strip chart recorders which are powered by static uninterruptible power supplies are available in the control room for the noted minimum set of TH recorder parameters.

The final concern expressed was that PTRs should be maintained in an accessible manner for the life of the plant. PTRs at Waterford 3 are currently performed in accordance with Operations Group Administrative Procedure OP-100-012, "Post-Trip Review". This procedure, which has been updated since its submittal in Reference 3, is attached for your information. Once the PTR is completed, it is forwarded to the appropriate department for Potential Reportable Event (PRE) initiation. Upon closure, the PRE and its associated PTR is transmitted to the Waterford 3 Records Center under a specific record type number. This number in particular has been assigned a lifetime retention period, thereby guaranteeing that these records will be retained in an accessible manner for the life of the plant.

It is our understanding that the information provided in this letter is sufficient to resolve your concerns on the PTR data and information capability for Waterford 3. Should you require additional information, please contact Tim Gaudet at (504) 595-2835.

Yours very truly,

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

RFB/TJG/plm

Attachments

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

ATTACHMENT 1

PTR PARAMETERS NOTED AS NOT BEING RECORDED AT WATERFORD 3

1. Containment Isolation

At Waterford 3, the Emergency Operating Procedures (EOP) require that a checklist be completed to verify that all containment isolation actuations have occurred for any CIAS (containment isolation actuation signal). The operator must check and verify that each valve is closed using control board indication. Actuation of the CIAS Train occurs by the receipt of either high containment pressure or low pressurizer pressure signals on any 2 of 4 channels, or manual actuation, and is monitored by the SOE Program. Therefore data for this parameter would be available for PTR.

2. Control Rod Position

When hitting the rod bottom contact (a digital point), a Control Element Drive Mechanism Control System alarm message would appear on the Alarm Printout. The Alarm Printout lists various digital and analog points when the point exceeds its alarm setpoint or when it resets (returns to normal). This computer printout, which continually runs in the Control Room, lists data points that are time stamped to the nearest second with a resolution of 1 to 1.5 seconds. It should be noted that the points monitored by the SOE Program are a subset of the Alarm Printout.

Additionally, control rod position is provided, as applicable, on the Core Protection Calculator (CPC) Buffer Report. This report is available for PTR if requested by the shift supervisor.

Consequently, recording capability for this parameter is available.

3. Primary System Flow

This parameter is monitored by the SOE program as the Low Primary Flow Trip. Additionally, the CPC Buffer Report lists the Reactor Coolant Pumps' speeds which are used to calculate Primary System Flow. Hence, this parameter is available for PTR.

4. Main Steam Isolation Valve (MSIV) Position

In accordance with EOP OP-902-000, "Emergency Entry Procedure," one of the operator's immediate actions following any trip is to verify MSIV closure by control board indication if a Main Steam Isolation Signal (MSIS) has, or should have, occurred. A MSIS should occur if containment pressure is $\geq$ 17.1 psia on 2 out of 4 channels or if, for either steam generator, pressure is $\leq$ 764 psia on 2 out of 4 channels. Actuation of either MSI signal train, by the receipt of either low steam generator (SG) pressure (2 out of 4 per SG) or high containment pressure signals on 2 out of 4 channels, would be monitored by the SOE Program. Therefore, data for this parameter would be available for PTR.

5. Steam Flow

Waterford 3 is not equipped with a steam flow trip. The steam flow rate may be used as an indication that heat is being removed from the reactor coolant system by the SGs. However, in the Waterford 3 EOPs, heat removal is verified by checking SG water level, saturation margin, and hot and cold leg temperature. All of these parameters are monitored by the TH directory, alarms of which are monitored on the SOE Program.

In addition to both TH directories, each steam line flow is available on a strip chart recorder.

Consequently, recording capability for this parameter is available.

6. PORV Position

Waterford 3 does not have pressurizer PORVs. Therefore, this parameter is not applicable.

ATTACHMENT 2

POST-TRIP REVIEW PROCEDURE