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September 20, 1988

J. G. DEWEASE
SENIOR VICE PRESIDENT
NUCLEAR OPERATIONS

W3P88-1299
A4.05
QA

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

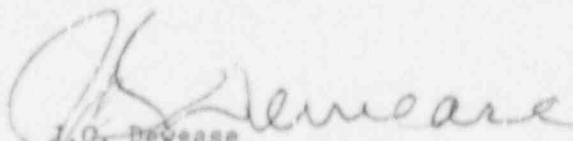
Subject: Waterford Steam Electric Station - Unit Number 3
Docket Number 50-382
Technical Specification Change Request NPF-38-87

Gentlemen:

Louisiana Power & Light Company hereby files an application for amendments to the Waterford 3 Technical Specifications and Operating License Number NPF-38. The proposed changes are requested pursuant to the guidance of Generic Letters 86-10 and 88-12 for removal of certain fire protection requirements from the Technical Specifications and adoption of the standard fire protection license condition. The Technical Specifications which would be deleted by the proposed amendment will be relocated to a plant administrative procedure.

The proposed changes do not involve an unreviewed safety question nor a significant hazards consideration. Should you have any questions or require additional information regarding the proposed changes, please contact Chad D. Groome at (504) 595-2846.

Very truly yours,


J.G. Dewease
Senior Vice President -
Nuclear Operations

JGD:CDG:ssf

Attachments: Proposed Change NPF-38-87, Affidavit,
LP&L Check #07-6409 - \$150.00

cc: R.D. Martin, J.A. Calvo, D.L. Wigginton, NRC Resident Inspectors
Office, E.L. Blake, W.M. Stevenson, Administrator Nuclear Energy
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"AN EQUAL OPPORTUNITY EMPLOYER"

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

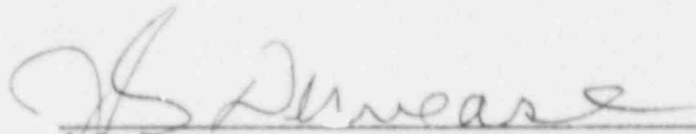
In the matter of)

Louisiana Power & Light Company)
Waterford 3 Steam Electric Station)

) Docket No. 50-382
)

AFFIDAVIT

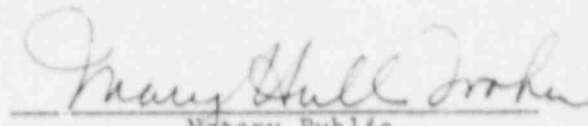
J.G. Dewease, being duly sworn, hereby deposes and says that he is Senior Vice President-Nuclear Operations of Louisiana Power & Light Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request NPF-38-87; that he is 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 29th day of September, 1988.



Notary Public

My Commission expires life.

NPF-38-87

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-87

This request will revise Operating License Condition 2.C.9, and revise or delete the following Technical Specifications (TS) and associated bases:

- 3/4.3.3.8 "Fire Detection Instrumentation", and bases
- 3/4.7.10 "Fire Suppression Systems", and bases
- 3/4.7.11 "Fire Rated Assemblies", and bases
- 6.2.2 "Unit Staff" (Fire Brigade Staffing)
- 6.5.1.6 "Responsibilities" (Plant Operations Review Committee).

Existing Specification

See Attachment A.

Proposed Specification

See Attachment B.

Description

The proposed changes are requested pursuant to the general guidance of Generic Letter (GL) 86-10 and the specific guidance of GL 88-12 for relocation of requirements for fire protection systems and fire brigade staffing from the Technical Specifications. GL 86-10 encouraged licenses, upon completion of appropriate compensatory action, to apply for a license amendment to relocate certain fire protection requirements from the Technical Specifications to a controlled document, and adopt a standard fire protection license condition in lieu of any existing fire protection license condition. GL 88-12 provides specific instructions for licensees who choose to do so.

This license amendment request is consistent with the guidance of GL 88-12. Specifically, this proposed change deletes fire protection Technical Specifications for fire detection systems (TS 3/4.3.3.8), fire suppression systems (TS 3/4.7.10), fire rated assemblies (TS 3/4.7.11) and associated bases, and fire brigade staffing (TS 6.2.2.e); augments the administrative controls over the fire protection program by requiring the Plant Operations Review Committee (PORC) to submit recommended changes to the fire protection program to the Safety Review Committee (SRC) (TS 6.5.1.6); and replaces the existing fire protection license condition (2.C.9) with the standard license condition presented in GL 86-10. Technical Specification 6.2.1 currently requires written procedures to be established, implemented and maintained for the fire protection program, therefore, this requirement (described in GL 88-12) need not be added to the Waterford 3 Technical Specifications. Administrative controls related to fire protection audits (TS 6.5.2.8) are being retained in the Technical Specifications. The deleted Technical Specifications are being moved, in toto, to a new plant administrative procedure, UNT-5-013, "Fire Protection Program".

The generic letters specify that in order to relocate fire protection requirements from the Technical Specifications, the approved fire protection program must be included in the Final Safety Analysis Report (FSAR), at least by

reference. GL 88-12 specifies that unless the program has previously been incorporated into the FSAR, the updated pages should be included with the license amendment request. The Waterford 3 FSAR contains a detailed description of the fire protection program including the fire hazards analysis, personnel qualification and training, comparison of plant design to applicable NRC guidelines, post-fire safe shutdown systems and methodology and quality assurance requirements. An FSAR revision will be required in conjunction with this license amendment request to identify the new procedure as part of the approved fire protection program. In accordance with 10CFR50.71(e), the updated FSAR incorporating this revision will be docketed in December 1989. However, this procedure (UNT-5-013) will become effective concurrent with implementation of the license amendment effecting this proposed change, and will be considered part of the approved fire protection program under the jurisdiction of the license condition and administrative control Technical Specifications upon becoming effective.

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.

Removal of fire protection surveillance requirements and limiting conditions for operation (LCO) from the TS will not involve a significant increase in the probability or consequences of any accident previously evaluated. No changes to the requirements of TS 3/4.3.3.8, 3/4.7.10, 3/4.7.11 nor 6.2.2.e are being made. The existing Technical Specification requirements are being moved from the Technical Specifications to plant administrative procedure UNT-5-013 and incorporated by reference into the FSAR. UNT-5-013 will become part of the approved fire protection program, changes to which are governed by License Condition 2.C.9 and TS 6.5.1.6. Changes to the approved fire protection program will require a safety evaluation in accordance with 10 CFR 50.59 and, if necessary, an FSAR change submitted with the certification required by 10 CFR 50.71(e). The additional Technical Specification requirement that PORC forward recommended changes to the SRC is an enhancement to the existing fire protection program.

The change in License Condition 2.C.9 is essentially administrative in nature, to be consistent with NRC standard language as provided in GL 86-10. The change in the license condition clarifies the basis of the evaluations which are required to make program changes without prior NRC approval by placing these evaluations solely under 10 CFR 50.59. This change also eliminates the Annual Fire Protection Report, as applicable changes in the fire protection program will be included in the Annual Report of Facility Changes, Tests and Experiments submitted in accordance with 10 CFR 50.59.

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 proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The requirements which are being removed from the Technical Specifications are being incorporated into a plant administrative procedure. Evaluation criteria for the fire protection program will remain essentially unchanged and equally applicable whether the operational elements of the program reside in the Technical Specifications or the Plant Operating Manual. Any changes to those requirements can be made only in accordance with the license condition and will require a 10 CFR 50.59 evaluation and PORC approval. The addition of the requirement for PORC to forward recommended changes to the SRC provides a level of oversight that is currently not required for most fire protection program changes.

Administratively modifying the license condition to be consistent with GL 86-10 will not create a new or different kind of accident from any accident previously evaluated. Rather, this change clarifies the evaluation criteria for making changes in the approved fire protection program to be consistent with the requirements of 10 CFR 50.59.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in the margin of safety?

Response: No.

Since the requirements of the approved fire protection program will remain unchanged, there will be no reduction in the margin of safety; any changes to the approved fire protection program will be governed by the license condition, administrative Technical Specifications and 10 CFR 50.59, the latter which will require demonstration on a case by case basis that changes to the program will not reduce the margin of safety.

The change in the license condition is administrative, to be consistent with the standard license condition presented in GL 86-10, and therefore will not involve a significant reduction in the margin of safety. Evaluations for proposed changes to the approved fire protection program will be performed under the criteria of 10 CFR 50.59, consistent with other plant changes, rather than as a separate, albeit similar evaluation as required by the current fire protection license condition.

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; (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.

NPF-38-87

ATTACHMENT A

Existing

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9. Fire Protection (Section 9.5.1, SSER 8)

- a. The licensee shall maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility through Amendment 36 and as approved in the SER through Supplement 9, subject to provisions b & c below.
- b. The licensee may make no change to features of the approved fire protection program which would decrease the level of fire protection in the plant without prior approval of the Commission. To make such a change the licensee must submit an application for license amendment pursuant to 10 CFR 50.90.
- c. The licensee may make changes to features of the approved fire protection program which do not decrease the level of fire protection without prior Commission approval, provided:
 - (1) such changes do not otherwise involve a change in a license condition or technical specification or result in an unreviewed safety question (see 10 CFR 50.59).
 - (2) such changes do not result in failure to complete the fire protection program approved by the Commission prior to license issuance.

The licensee shall maintain, in an auditable form, a current record of all such changes including an analysis of the effects of the change on the fire protection program and shall make such records available to NRC inspectors upon request. All changes to the approved program made without prior Commission approval shall be reported annually to the Director of the Office of Nuclear Reactor Regulation, together with supporting analyses.

- d. The licensee shall provide smoke detectors in the Control Room main control panels, which are installed in accordance with NFPA 72E, prior to startup following the first refueling outage.
- e. The licensee shall complete modifications resulting from its spurious signal analysis prior to startup following the first refueling outage, but in any case not later than June 1, 1987.

Existing

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- f. The licensee shall provide neutron flux indication at LCP-43 which is electrically independent of the control room and cable vault prior to start-up following the first refueling outage, but in any case not later than June 1, 1987.
- g. The licensee shall provide a continuous fire watch in the relay room at the isolation panel from initial criticality until acceptable resolution of adverse effects, if any, of the loss of this panel on safe shutdown.

10. Post-Fuel-Loading Initial Test Program (Section 14, SSER 10)

Any changes to the Initial Test Program described in Section 14 of the FSAR made in accordance with the provisions of 10 CFR 50.59 shall be reported in accordance with 50.59(b) within one month of such change.

11. Emergency Response Capabilities (Section 22, SSER 8)

The licensee shall comply with the requirements of Supplement 1 to NUREG-0737 for the conduct of a Detailed Control Room Design Review (DCRDR). Prior to May 1, 1985, the licensee shall submit for staff review and approval the DCRDR Summary Report, including a description of the process used in carrying out the function and task analysis performed as a part of both the DCRDR and the Procedures Generation Package efforts.

12. Reactor Coolant System (RCS) Depressurization Capability (Section 5.4.3, SSER 8)

By June 18, 1985, the licensee shall submit the results of confirmatory tests regarding the depressurization capability of the auxiliary pressurizer spray (APS) system. This information must demonstrate that the APS system can perform the necessary depressurization to meet the steam generator single-tube rupture accident acceptance criteria (SRP 15.6.3) with loop charging isolation valve failed open. Should the test results fail to demonstrate that the acceptance criteria are met, the licensee must provide for staff review and approval, justification for interim operation, and a schedule for corrective actions.

13. Response to Salem ATWS Event (Section 7.2.9, SSER 8)

The licensee shall submit responses and implement the requirements of Generic Letter 83-28 on a schedule which is consistent with that given in the licensee's letter of May 30, 1984.