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J. G. DEWEASE
SENIOR VICE PRESIDENT
NUCLEAR OPERATIONS

June 7, 1988

W3P88-0995
A4.05
QA

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

SUBJECT: Waterford 3 SES
Docket No. 50-382
Technical Specification Change Request NPF-38-82

Gentlemen:

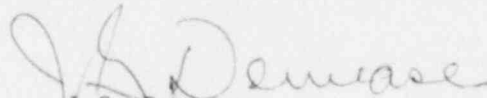
Please find attached proposed Technical Specification Change Request NPF-38-82. The proposed change would revise Table 3.3-1, Reactor Protective Instrumentation.

The proposed change would allow plant operators to bypass the Reactor Coolant Flow-Low trip below 10⁻⁴% of Rated Thermal Power.

The enclosed amendment does not involve an unreviewed safety question nor a significant hazards consideration. Should you have any questions or require additional information concerning the proposed change, please contact Larry Laughlin at (504) 464-3499.

Enclosed with this submittal is the application fee of \$150 pursuant to the requirements of 10CFR170.

Yours very truly,


J.G. Dewease
Senior Vice President
Nuclear Operations

JGD:LWL:ssf

Attachment

cc: R.D. Martin, J.A. Calvo, D.L. Wigginton, NRC Resident Inspectors Office,
E.L. Blake, W.M. Stevenson

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“EQUAL OPPORTUNITY EMPLOYER”

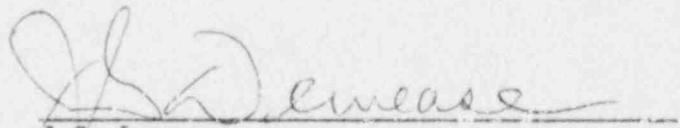
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

AFFIDAVIT

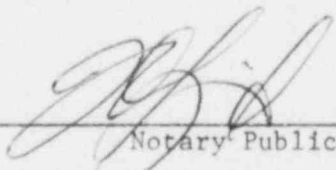
J.G. Dewease, being duly sworn, hereby deposes and says that he is Senior Vice President-Nuclear Operations of Louisiana Power & Light Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request NPF-38-82; that he is 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)) 33
PARISH OF ORLEANS)

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 7th day of JUNE, 1988.



Notary Public
THOMAS O. LIND, NOTARY PUBLIC
MY commission is issued for life.
PARISH of ORLEANS, STATE of LOUISIANA

My Commission expires _____.

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-82

This is a request to revise Technical Specification Table 3.3-1, Reactor Protective Instrumentation, to allow bypassing the Reactor Coolant Flow-Low trip below 10^{-4} % of Rated Thermal Power.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Description

The proposed Technical Specification change would allow plant operators to bypass the Reactor Coolant Flow-Low trip below 10^{-4} % of Rated Thermal Power. Presently, Table 3.3-1 requires the subject trip to be operable in Modes 1 and 2.

Design Change (DC) 3012 will install a bypass for the Reactor Coolant Flow-Low trip. Presently, this is accomplished by installing jumpers across the trip bistables. Although this procedure is performed under strict administrative controls, LP&L feels this operation is subject to human error. The design change will allow plant operators to bypass the trip using a key switch mounted on Control Panel (CP) -7. The design change will also include a feature which will automatically remove the bypass when reactor power exceeds 10^{-4} % of Rated Thermal Power. The proposed change, therefore, is requested to facilitate the design change.

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 Reactor Coolant Flow-Low trip is designed to ensure no safety limits are reached in the event of a reactor coolant pump sheared shaft.

For the sheared shaft event, the primary concern is the potential to exceed the Departure from Nucleate Boiling Ratio (DNBR) limits and possible fuel failure. As reactor power decreases, the potential for exceeding the DNBR limit also decreases. Below 10^{-4} % of Rated Thermal Power, the sheared shaft event no longer poses the potential for exceeding DNBR.

The bypass and automatic override will be designed in accordance with IEEE-279 and -388.

The proposed change, therefore, will not significantly increase the probability or consequences of an accident.

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.

As mentioned above, the Reactor Coolant Flow-Low trip is designed to minimize the amount of fuel failure in the event of a sheared shaft. Should a shaft for a RCP shear below 10^{-4} % of Rated Thermal Power, sufficient flow would be maintained to prevent the DNBR limit from being exceeded. The low flow trip, therefore, is not required below 10^{-4} %.

Bypassing the Reactor Coolant Flow-Low trip below 10^{-4} % of Rated Thermal Power will not create a new or different accident.

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

Response: No.

As previously mentioned, the sheared shaft event does not pose a safety concern below 10^{-4} % of Rated Thermal Power. The design and operation of the bypass is in accordance with IEEE-279 and -388.

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.