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October 7, 1988

W3P88-1916
A4.05
QA

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

SUBJECT: **Waterford SES Unit No. 3**
Docket No. 50-382
Compliance with 10CFR50.62
Reduction of Risk From Anticipated
Transients Without Scram Events

REFERENCES: 1) W3P85-2696, dated October 10, 1985
2) CEN-380, dated September, 1988
3) CEN-380 Supplement 1, dated September, 1988
4) W3P87-0916, dated March 17, 1987

Gentlemen:

By References 1 and 4, LP&L committed to the installation of a diverse scram system (DSS) and turbine trip (TT) in accordance with 10CFR50.62 (the ATWS Rule) by the end of the 3rd refueling outage at Waterford 3.

This report describes the design and function of the DSS and TT, including a detailed comparison with the requirements of the ATWS Rule and its underlying regulatory guidance, in order to establish Waterford 3 compliance with 10CFR50.62 for the DSS and TT.

The ATWS Rule also requires equipment diverse from the reactor trip system (RTS) to automatically initiate the emergency feedwater actuation system (EFAS) under conditions indicative of an ATWS. As you know, Waterford 3 and several other CE plants have consistently taken the position that diversity already exists between the RTS and the present EFAS sufficient to meet the requirements of the ATWS Rule. Several years of technical discussions on this issue between the CE Owners Group and the NRC Staff culminated in a Staff decision that certain of the EFAS relays for Waterford 3 do not meet the diversity requirements of the ATWS Rule. At the same time, the Staff suggested that submittal of a request for exemption to the EFAS requirements of 10CFR50.62 was an acceptable alternative to EFAS hardware changes.

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Consequently, based on References 2 and 3 included in the attached report, LY&L requests an exemption to the ATWS Rule EFAS diversity requirements. Our original position on the adequacy of EFAS diversity remains unchanged, however, and is reiterated for completeness.

We recognize that there is some potential for an exemption review to delay issuance of a safety evaluation report. Therefore, we request your timely review of the DSS and TT design (separately from the exemption request) in order to support design finalization, procurement and construction of the DSS/TT during the 3rd refueling outage (tentatively scheduled to begin in September, 1989).

Should we be able to provide you with additional information to assist in your review, please do not hesitate to contact Roy Prados at (504) 595-2806.

Yours very truly,



R.F. Burski
Manager
Nuclear Safety & Regulatory Affairs

RFB/MJM/plm

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