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November 1, 1988

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

SUBJECT: Waterford 3 SES
Docket No. 50-382
License No. NP7-38
Generic Letter 88-11

REFERENCE: LP&L Letter W3P86-0251, dated February 20, 1986

On July 12, 1988, the NRC issued Generic Letter 88-11 which apprised Licensees of the NRC's intent to use Regulatory Guide 1.99, Revision 2, in reviewing submittals regarding pressure-temperature limits and for analyses of the embrittlement of reactor vessel belt line materials. LP&L has applied the methodology of Regulatory Guide 1.99, Revision 2, and LP&L has concluded there is no change required for the analysis of record for Waterford 3 for the pressure-temperature technical specification limits, 10 CFR Part 50, Appendix G, estimate of embrittlement, or pressurized thermal shock, 10 CFR 50.61.

The reactor vessel belt line consists of six plates and three weld materials, reference FSAR Table 5.3-13. The material which resulted in the maximum calculated value of the adjusted reference temperature was plate M-1004-2. An adjusted reference temperature of 88°F was calculated using the methodology of Regulatory Guide 1.99, Revision 2, for plate M-1004-2.

The temperature and pressure limits in technical specification 3.4.8.1 for heatup and cooldown, reference figures 3.4-2 and 3.4-3, were based on an adjusted reference temperature of 97°F, reference FSAR section 5.3.2.1. Thus, the temperature and pressure limits in technical specification 3.4.8.1 are limiting since a higher value of the adjusted reference temperature

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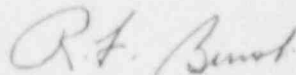
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was used in the development of the pressure temperature limits. Also, the Low-Temperature Overpressure Protection (LTO) setpoints and enable temperatures do not have to be revised since the pressure temperature limits do not have to be revised.

The adjusted reference temperature of 88°F, calculated using the methodology of Regulatory Guide 1.99, Revision 2, also satisfies the screening criterion of 270°F for the evaluation of Pressurized Thermal Shock (PTS) pursuant to 10CFR 10 CFR 50.61. The adjusted reference temperature of record for Waterford 3 for PTS is 85°F, see referenced letter. The analysis of record for the PTS Rule, see referenced letter, is therefore not affected by Regulatory Guide 1.99, Revision 2.

Please contact me or Robert J. Murillo should there be any questions concerning this letter.



R. F. Burski
Nuclear Safety and
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RFB/RJM/jkl

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