



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 21, 1999

50-382

Mr. Charles M. Dugger
Vice President Operations
Entergy Operations, Inc.
P. O. Box B
Killona, LA 70066

SUBJECT: SAFETY CLASSIFICATION OF INSTRUMENT AIR TUBING AND
COMPONENTS FOR SAFETY RELATED VALVE TOP WORKS AT
WATERFORD STEAM ELECTRIC STATION, UNIT 3 (TAC NO. M99161)

Dear Mr. Dugger:

The staff has reviewed the Entergy Operations, Inc. (EOI), letter dated July 3, 1997, as supplemented by letter dated November 13, 1998, for an exception to Nuclear Regulatory Commission Regulatory Guide (RG) 1.26, "Quality Group Classifications and Standards for Water, Steam and Radioactive Waste-Containing Components of Nuclear Power Plants," regarding the safety classification of Instrument Air (IA) tubing and components of safety-related valve top assemblies at Waterford Steam Electric Station, Unit 3 (Waterford 3). Based on the enclosed Safety Evaluation, the staff has concluded that your request is acceptable for the IA tubing and components of safety-related valve top assemblies currently installed at Waterford 3. However, the staff has also determined that your request is not justifiable for future installation of similar components at Waterford 3. Therefore, for future installation or replacement of IA tubing and components of safety-related valve top assemblies at Waterford 3, the request for exception from the RG 1.26 classification is acceptable, provided the new IA tubing and components of safety-related valve top assemblies at Waterford 3 satisfy all Division 1 construction requirements, defined in American Society of Mechanical Engineers (ASME) Code Section III, Subarticle NCA-1110, Article NCA-9000, and Subsection ND, with the following exceptions:

1. The design may be based on the rules of ANSI B31.1, except that the tubing supports should be designed as Seismic Category 1.
2. The tubing and components may be exempted from the Authorized Nuclear Inspection requirement.

The exception from RG 1.26 for installed components represents a non-conformance with the ASME Code and therefore, constitutes a deviation from the plant licensing commitments. The staff therefore, recommends that EOI revise its licensing basis for Waterford 3, to permit incorporation of the change summarized above.

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Mr. Charles M. Dugger

-2-

This completes our review of your request. If you have any questions regarding this response please contact me at (301) 415-3025.

Sincerely,

ORIGINAL SIGNED BY:
Chandu P. Patel, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure: As stated

cc w/encl: See next page

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Mr. Charles M. Dugger

-2-

This completes our review of your request. If you have any questions regarding this response please contact me at (301) 415-3025.

Sincerely,

Chandu P. Patel

Chandu P. Patel, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

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Enclosure: As stated

cc w/encl: See next page

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Waterford 3

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