

January 29, 2002

Mr. John T. Herron
Vice President Operations
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - REQUEST FOR
ADDITIONAL INFORMATION RELATED TO REQUEST FOR REVIEW AND
APPROVAL OF DESIGN BASIS CHANGE REGARDING REALIGNMENT OF
REFUELING WATER STORAGE POOL (RWSP) BOUNDARY ISOLATION
VALVES TO THE RWSP PURIFICATION SYSTEM (TAC NO. MB1688).

Dear Mr. Herron:

By letter dated April 2, 2001, Entergy Operations, Inc. requested review and approval, pursuant to 10 CFR 50.59, of changes to the Waterford Steam Electric Station, Unit 3, design basis as described in the Final Safety Analysis Report for which it has been determined an unreviewed safety question exists. The change concerns design requirements for the alignment of the RWSP boundary isolation valves to the RWSP Purification System.

After reviewing your request, the Nuclear Regulatory Commission staff has determined that additional information is required to complete the review. On January 22, 2002, we discussed this information with your staff by telephone and they agreed to provide the additional information requested in the enclosure within 30 days of receipt of this letter.

If you have any questions, please call me at (301) 415-1480.

Sincerely,

/RA/

N. Kalyanam, Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure: Request for Additional Information

cc: See next page

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REQUEST FOR ADDITIONAL INFORMATION
RELATED TO REQUEST FOR REVIEW AND APPROVAL OF
DESIGN BASIS CHANGE REGARDING REALIGNMENT OF
REFUELING WATER STORAGE POOL (RWSP) BOUNDARY ISOLATION VALVES
TO THE RWSP PURIFICATION SYSTEM
ENTERGY OPERATIONS, INC.
WATERFORD STEAM ELECTRIC STATION, UNIT 3

1. Page 4 of 17, Attachment 1 - please explain what is meant by, "...stationing a dedicated operator in the vicinity of the isolation valves who is in communication with the control room and available to secure the system lineup." Specifically, where is this operator located in relation to the valves? Per figure 6.2-35, how far are valves FS423 and FS404 from one another? In the walkdown and American National Standards Institute (ANSI) 58.8 calculation, did the times specified (i.e., 11 minutes and 54 minutes, respectively) include securing both valves?
2. Page 10 of 17, Attachment 1 - ANSI 58.8 calculations. The calculated time of 54 minutes does not appear to take into consideration the "fixed sub-interval" time of 30 minutes that is specified by ANSI 58.8, "... If safety-related operator actions are performed outside of the control room, the fixed sub-interval shall be extended to 30 minutes to allow the operator sufficient time to make the necessary preparations and to reach the location at which the action is to be performed." Per paragraph 4.2 of ANSI 58.8 (1984), "...each safety-related and required operator action..." shall have a $TI_{operator}$ calculated for it (this includes a value for the fixed sub-interval). Please explain how the times associated with the various actions on page 10 of 17 were derived, with respect to ANSI 58.8 guidance.
3. Page 11 of 17, Attachment 1 - please describe how the "actual plant walkdown" was conducted, e.g., who participated in the walkdown - Were they qualified remote operator(s) or training staff? How many times was the walkdown conducted and how many qualified operators participated? Were there any failures? Were both valves "isolated" in a total of 11 minutes as part of the walkdown? What is involved with actually isolating the valves, i.e., are any tools required, ladders for access, chains to be removed/manipulated, etc? Was the walkdown accomplished by personnel with prior knowledge of what they were being asked to accomplish or were they "naive" to the scenario?

Waterford Generating Station 3

cc:

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and State Liaison Officer
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