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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. NPF-38
Withdrawal of Licensee Event Report 2002-004-00

Gentlemen:

On April 26, 2002, Entergy submitted Licensee Event Report (LER) 2002-004-00 for Waterford Steam Electric Station Unit 3. The LER documented that valves used to isolate the Containment Spray System from the Low Pressure Safety Injection System had a potential to leak. The potential leakage could occur during operation of the Containment Spray Pump and when the Low Pressure Safety Injection System was open to the atmosphere for maintenance activities. This condition was reported per 10CFR50.73(a)(2)(v)(C) as an event or condition that could have prevented the fulfillment of a safety function required to control the release of radioactive material.

This event should not have been reported based on the fact that the potential leakage and potential radiological release would not exceed 10CFR100 limits. This information was contained in the LER. However, personnel did not integrate this information in the decision making process, and Entergy incorrectly dispositioned this event as a reportable condition.

In LER 2002-004-00, Entergy evaluated the potential condition for flooding and radiological dose impact, Refueling Water Storage Pool (RWSP) inventory loss, and Containment Spray diversion. Based on the evaluation, there was no condition that could have prevented the fulfillment of a safety function required to control the release of radioactive material and no potential for a radiological release beyond 10CFR100 limits. A summary of the evaluation is attached.

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Therefore, this event did not represent a reportable condition, and this LER is being withdrawn.

There are no commitments contained in this submittal.

Should you have any questions regarding this letter, please contact Greg Scott at (504) 739-6703.

Very truly yours,

G. Sen
Manager, Licensing

GS/GCS/cbh
Attachment

cc: T.P. Gwynn (NRC Region IV), N. Kalyanam (NRC-NRR),
R.K. West, lerevents@inpo.org - INPO Records Center,
J. Smith, N.S. Reynolds, NRC Resident Inspectors Office,
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Evaluation Summary

Flooding Impact

Entergy determined that the maximum expected leakage into the Controlled Ventilation Areas System (CVAS) due to bonnet bypass leakage would be 46 gpm. This leak rate poses no significant flooding impact and is bounded by the flooding analysis outside containment per Calculation MN(Q)-3-5.

Dose Impact

Entergy's Root Cause Determination (RCD) Report CR-W3-2002-0322, "Flooding Alarm Volumes", provided an estimated flooding volume for the potentially impacted Safeguard Rooms and the -35 Reactor Auxiliary Building Wing Area. Based on these volumes, operators would be alerted to flooding in the affected area by a Control Room Alarm. Operator action was assumed to isolate the leakage, conservatively one hour after the alarm. The additional dose impact of potential leakage from Containment Spray through the Low Pressure Safety Injection system, as documented in attachment 2 of the RCD, was determined not to exceed 10CFR100 limits.

RWSP Inventory

The potential RWSP inventory loss, as documented in RCD CR-W3-2002-0322 was determined to be 14,609 gallons into the CVAS areas. The available RWSP margin was determined to be 28,877 gallons. Accordingly, sufficient RWSP inventory is available after accounting for the potential leakage.

Containment Spray Diversion

RCD CR-W3-2002-0322 evaluated the impact of the Containment Spray (CS) flow leakage on the post-LOCA and Main Steam Line Break containment pressure response. LOCA Peak Pressure, LOCA Worst 24 Hour Pressure, and Main Steam Line Break Peak Pressure were reviewed. The following limiting cases were evaluated as provided below:

- LOCA Peak Pressure

  Hot leg break is the limiting LOCA for containment peak pressure. The peak pressure for this event occurs very early into the event (during the blowdown phase of the LOCA), about 13 seconds. Since containment spray flow reaches containment after 32 seconds, the peak pressure is not impacted by the CS flow rate.

- LOCA Worst 24 Hour Pressure

  This event was analyzed with 50 gpm reduction in CS flow for a 24 hour period. Per Standard Review Plan 6.2.1.1.A, containment pressure after 24 hours must be less than one half of the peak calculated pressure. The calculated pressure after 24 hours increased by 0.20 psi and the resultant 24 hour pressure was found to be less than one half of the peak pressure for this event in accordance with Standard Review Plan 6.2.1.1.A.

- MSLB Peak Pressure

  This event was analyzed with 50 gpm reduction in CS flow. The increase in the containment pressure due to the reduction in containment spray flow was found to be negligible (0.07 psi), and the peak pressure was found to be within the acceptance limit (less than 44 psig).