



ENTERGY

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Waterford 3

W3F1-93-0202
A4.05
QA

February 25, 1993

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
Reporting Reactor Power Cutback System Actuation

Gentlemen:

Entergy Operations, Incorporated requests relief from reporting Reactor Power Cutback System (RPCS) malfunctions as described in the Waterford 3 Safety Evaluation Report (SER).

The SER states that since this was a first-of-a-kind system, the inadvertent or spurious operation or malfunction of the RPCS should be reported in Licensee Event Reports (LER) for at least the first two fuel cycles of operation. The SER also stated that the operating experience gained with this system may be reviewed and relief requested from the reporting requirement. Waterford 3 committed to submitting the LERs in a letter dated June 1, 1984.

As described in the Final Safety Analysis Report (FSAR), the RPCS is a control system designed to accommodate certain types of imbalances by providing a "step" reduction in reactor power. The step reduction in reactor power is accomplished by the simultaneous dropping of one or more preselected groups of full length regulating Control Element Assemblies (CEA) into the core. The CEA groups are dropped in their normal sequence of insertion. The RPCS also provides control signals to the turbine to rebalance turbine and reactor power following the initial reduction in reactor power as well as to restore steam

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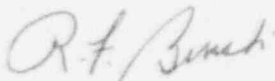
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generator water level and pressure to their normal controlled values. The system is designed to accommodate the loss of one feedwater pump.

A search was conducted and only one LER was found to have been generated as a result of the inadvertent or spurious operation or malfunction of the RPCS. LER-87-020 was submitted on August 31, 1987. As described in this LER, the actuation of the RPCS was due to a main feedwater pump trip. The RPCS acted properly to reduce turbine load, but failed to drop Control Element Assemblies to reduce reactor power because of a loose connection on a semiconductor. Waterford 3 feels that lack of incidents involving the RPCS is justification for requesting relief from this requirement. In addition, a 10CFR50.59 safety evaluation was performed to confirm that no unreviewed safety question exists as a result of deleting this commitment.

Should you have any questions, please contact B.G. Morrison at (504) 739-6682.

Very truly yours,



R.F. Burski

Director, Nuclear Safety

RFB/BGM/stf

cc:

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