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W3F1-93-0041  
A4.05  
PR

May 7, 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  
Request For Exemption to 10 CFR Part 50 Appendix J Section  
III.D.1(a)

Gentlemen:

Entergy Operations Incorporated, holder of Facility Operating License NPF-38 which authorizes operation of the Waterford 3 Steam Electric Station hereby requests a one-time exemption to the Commission's regulations. The exemption request is submitted in accordance with the provisions of 10 CFR 50.12 and facilitates our proposed Technical Specification Change Request (TSCR) NPF-38-135, submitted as a separate licensing action via letter W3F1-93-0034 dated May 7, 1993.

The subject exemption is from a requirement in Appendix J to 10 CFR part 50 which requires a set of three Type A tests ( Containment Integrated Leakage Rate Tests or CILRT ) be performed at approximately equal intervals during each 10-year service period. The exemption would allow the third Type A test interval of the first 10-year service period to be slightly greater than that required by existing criteria and is necessary to avoid the performance of an additional CILRT within this time frame. The NRC has previously approved a similar exemption request as indicated in the Federal Register (58 FR 12602) dated March 5, 1993.

#### DESCRIPTION

Type A tests are defined in 10 CFR Part 50 Appendix J Section II.F as "tests intended to measure the primary reactor containment overall integrated leakage rate (1) after the containment has been completed and is ready for operation, and (2) at periodic intervals thereafter." The periodic retest schedule for Type A tests is prescribed by 10 CFR Part 50 Appendix J Section III.D.1(a): "After the preoperational leakage rate tests, a set of three

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Type A tests shall be performed, at approximately equal intervals during each 10-year service period. The third tests of each set shall be conducted when the plant is shutdown for the 10-year plant inservice inspections."

The Waterford 3 Technical Specifications (TS) 4.6.1.2.a requires that three Type A test be conducted at  $40 \pm 10$  month intervals. This Surveillance incorporates the requirements of Appendix J Section III.D.1(a). The time required to perform the CILRTs necessitates that they be performed during refueling outages. The time interval between CILRTs should be about 40 months based on performing three such tests at approximately equal intervals during each 10-year service period. Since refueling outages do not necessarily occur coincident with a 40 month interval, a permissible variation of 10 months (i.e., a 25 percent variation) is authorized in the TS to permit flexibility in scheduling.

Per ASME Section XI IWA-2400(a), the 10-year service period begins with the inservice date. The first and second CILRTs of the first 10-year service period for Waterford 3, were conducted in May 1988 and May 1991 respectively. This represents testing intervals of 32 and 36 months based on an inservice date of September 1985. This would indicate that the third of the first set of three CILRTs be performed during Refuel 6 (scheduled for March 1994) which will be 34 months after the preceding test. However, this would not meet the TS and CFR requirement to perform the third CILRT during shutdown for the 10-year inservice inspection interval. ASME Section XI IWA-2400(c) allows the 10-year inspection interval to be decreased or extended by as much as one year. Thus, performing the third CILRT during Refuel 6 would not meet this criteria while the Refuel 7 projected start date of October 1995 is well within these bounds. In order to comply with the TS criteria and CFR requirements Waterford 3 would be forced to perform an extra CILRT within the first 10-year service period.

To avoid performing a fourth CILRT, we are proposing that the third CILRT for the first 10-year service period be scheduled for November 1995 during Refuel 7 which is currently projected to begin in October 1995. This will allow compliance with all other criteria and represents a one-time extension of approximately four months beyond the maximum permitted TS CILRT test interval which is based on the Appendix J requirement.

The benefit of not performing an additional CILRT is a reduction in personnel radiation exposure. A dose savings will be realized from eliminating contamination, reducing exposure for venting and draining, and from setup and restoration of instrumentation required to perform the test.

Data from the first (May 1988) and second (May 1991) CILRTs at Waterford 3 indicates that most of the measured leakage is from the containment penetrations and not from the containment barrier. Penetration and valve leakage, is measured by the performance of Type B and C tests (Local Leakage Rate Test or LLRT).

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The LLRT program is not altered by this request, therefore, containment integrity will continue to be verified by LLRTs. In addition, the data from the previous CILRTs illustrates that the "as-left" leakage rate was well below the acceptance limits established in 10 CFR Part 50 Appendix J, and Technical Specifications. The allowable leakage rate,  $L_a$ , is 0.5 wt. %/day, however, Appendix J and TS require that the leakage rate be less than 75% of  $L_a$  to allow for deterioration in leakage paths between tests. Therefore, the acceptance limit is <0.375 wt. %/day. The "as left" leakage rates for the first two CILRTs were 0.116 and 0.0731 wt. %/day which is well below the acceptance limit.

Additionally, there have been no modifications made to the containment structure since the last CILRT that could adversely affect the test results.

#### ENVIRONMENTAL CONSIDERATIONS

This exemption request involves the use of facility components located within the restricted area, as defined in 10 CFR part 20, and changes a surveillance requirement. Entergy Operations Incorporated, has determined that this request does not involve:

- (1) A significant hazard consideration, as described in our amendment application TSCR NPF-38-135, dated May 7, 1993;
- (2) A significant change in the types or significant increase in the amounts of any effluents that may be released offsite;
- (3) A significant increase in individual or cumulative occupational radiation exposure.

Accordingly, this request meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c) (9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with this exemption request.

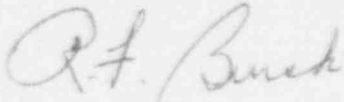
#### CONCLUSION

Due to the leaktight integrity of the containment as justified by previous leakage test results, a one-time extension of approximately 4 months beyond the maximum permitted CILRT test interval will not have a significant safety impact. Based on the reasons set forth above, we believe that the subject exemption meets the underlying purpose of the rule which requires three Type A tests be performed in a 10-year period, and therefore may be authorized in accordance with 10 CFR 50.12(a)(2)(ii).

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Should you have any questions or comments concerning this request, please  
contact Paul Caropino at (504) 739-6692.

Very truly yours,



R.F. Burski  
Director  
Nuclear Safety

RFB/PLC/dc

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