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**POWER & LIGHT**

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MIDDLE SOUTH  
UTILITIES SYSTEM

July 1, 1982

L. V. MAURIN  
Vice President  
Nuclear Operations

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Mr. R. L. Tedesco  
Assistant Director of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Waterford-3 SES  
Docket No. 50-382  
NUREG-0737  
Safety Valve Functionability

Dear Mr. Tedesco:

The purpose of this letter is to provide the Louisiana Power & Light response to the July 1, 1982, NRC request for a submittal that addresses the functionability of the pressurizer safety valves that are installed in the Waterford 3 system. Item II.D.1.A of NUREG-0737 required that utilities operating and/or constructing Pressurized Water Reactor (PWR) power plants provide evidence, supported by test, of safety valve functionability. In response to these requirements, the Electric Power Research Institute (EPRI) implemented a generic test program on behalf of the PWR utilities. Louisiana Power & Light has been a participant in the EPRI program. The NRC Generic Letter 81-36 dated September 19, 1981, contains a schedule for the submittal of test results and the submittal of plant-specific reports. In accordance with this schedule, results of the EPRI program, summarized in various EPRI reports, were forwarded to the NRC on April 1, 1982, in parallel with distribution to the participating utilities.

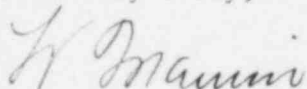
In order to facilitate an expeditious evaluation of the test data, Louisiana Power & Light, in conjunction with other utilities operating and constructing Combustion Engineering (C-E) designed plants, has, through the C-E Owners Group, requested that C-E implement a program to evaluate and apply the EPRI test results. The C-E Owners Group program was subsequently initiated in April, 1982, and is currently in progress. Louisiana Power & Light is a participant in this program. The approach

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being applied by the C-E Owners Group is to show that particular EPRI tests were directly representative of plant-specific safety valve models and valve installations, and that acceptable valve operation was demonstrated.

With regard to the evaluation of safety valves, the safety valve used at Waterford-3 is the Dresser Safety Valve Model 31709NA with a "short inlet pipe configuration". This valve model and inlet pipe configuration was tested in the EPRI program and the test conditions enveloped the range of fluid conditions recommended by NUREG 0737. The results of the testing on the Dresser Safety Valve Model 31709NA are contained in section 3.2 of the EPRI Safety and Relief Valve Test Report dated April, 1982. The valve discharge for Waterford is limited to steam conditions, and the valves are installed on short inlet pipes extending from the pressurizer. This type of arrangement and the steam condition has been shown in the EPRI program to be the most optimum for the valves to perform their function. Although there is no safety concern, future valve adjustments may be beneficial to assure optimal performance. Currently, detailed plant-specific evaluation and application of the EPRI data is being performed as part of the Owners Group program. In addition, input from the valve manufacturers is being requested. That information is expected to be received during the third quarter of 1982, and will then be incorporated into the C-E evaluation. If valve adjustments are necessary, they will be identified in the C-E evaluation based on performance demonstrated by the EPRI tests. The results will be presented in a C-E Owners Group report that is scheduled for completion in December, 1982. Since Louisiana Power & Light is a participant in the program, the operability of safety valves in the Waterford system will be addressed by this report. Currently, our intent is to provide you with the final report, which will serve as our final submittal, by December 31, 1982.

Yours very truly,



L. V. Maurin

LVM/REW/pco

cc: S. Black, E. Blake, W. M. Stevenson