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July 19, 1982

L. V. MAURIN
Vice President
Nuclear Operations

W3P82-1928
3-A45

50-382

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

SUBJECT: Waterford 3
Emergency Planning

Reference: Letter from NRC to LP&L dated June 22, 1982

Dear Mr. Tedesco:

We have reviewed the referenced letter and understand that your comments on the Emergency Classification Scheme are based on Revision 3 to the subject plan.

It should be noted that we submitted Revision 4 to the Waterford 3 Emergency Plan in June, 1982 which revised the Emergency Action Levels EALs) in Table 4-1. We have also submitted draft Emergency Plan Implementing Procedures in June, 1982. In order to completely review the revised EALs, one should review Table 4-1 (Revision 4) and EP-1-001 (Revision 0).

We would also like to inform you that the emergency plan exercise for NRC and FEMA evaluation that was scheduled for August, 1982 has been postponed until later on this year. A revised emergency planning schedule should be complete within the next several weeks and we will provide you with the information as soon as it is available.

If there are any questions please contact Mr. R. G. Azzarello of my staff.

Yours very truly,

L. V. Maurin

LVM/RGA/pco

Attachment

cc: E. Blake, M. Stevenson, F. J. Miraglia, S. Black, D. Perrotti,
L. Constable



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Docket No. 50-382

JUN 22 1982

RECEIVED
NUCLEAR REGULATORY COMMISSION

Mr. L. V. Maurin
Vice President - Nuclear Operations
Louisiana Power & Light Company
142 Delaronde Street
New Orleans, Louisiana 70174

JUN 28 1982

W.P. 82-3712

Dear Mr. Maurin:

Subject: Review of the Emergency Classification Scheme

The staff has completed its review of the Emergency Classification Scheme contained in Section 4 of the Waterford 3 Radiological Emergency Plan, Revision 3. As a result of our review we find that additional information/clarification is required on the Emergency Action Levels (EALs) listed in Table 4-1 of Section 4 of the Plan before we can conclude that the EALs conform to the guidelines expressed in Appendix 1 to NUREG-0654.

Please provide your response to the enclosed staff comments within sixty days. If you desire any discussion or clarification on the information requested, please contact the Project Manager Suzanne Black on (301) 492-7702 or Mr. D. J. Perrotti, EPLB on (301) 492-4871.

Sincerely,

Frank J. Miraglia, Chief
Licensing Branch No. 3
Division of Licensing

Enclosure:
Comments on
EAL's

cc w/enclosure:
See next page

I J Drummond *ADVANCE COPY* *L Sabre*
R W Prados *Licensing Library*
L V Maurin *A B Lester* *L R Fife*
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REVIEW OF WATERFORD NUCLEAR STATION EALS

GENERAL COMMENTS

The licensee has taken the position that except for those that have been so noted the initiating conditions do not apply unless the plant is in Mod 1, (operating at high power). This is unacceptable. Many of the nonannotated initiating conditions are serious events even at low power, hot standby or even cold shutdown. The licensee should drop this approach. If there are a few instances where the emergency criteria can be loosened because of plant status, they should be individually addressed and justified.

The Initiating Conditions relating to security (Unusual Event-12, Alert-16, Site Area-14, General-3) do not follow the recommendations in NUREG-0818. The licensee's EAL for an Unusual Event requires reaching security condition level "Yellow". The EAL for an Alert in addition to condition Yellow requires assistance from the local Law Enforcement Agency. A Site Area Emergency is declared if condition "Red" is reached and a General Emergency is declared if a physical attack on the plant has resulted in occupation of the control room, or local shutdown stations by unauthorized persons. The EALs cannot be evaluated because the licensee has failed to provide information on the precise activities that would create a Yellow or Red condition. The possibility that the licensee's approach is nonconservative is indicated by the requirement that the control and shutdown panels must be occupied before declaring a General Emergency. NUREG-0818 calls for a General Emergency if any vital area is occupied.

UNUSUAL EVENT

The licensee has presented a number of the initiating conditions without EALs, probably because the event itself is an EAL. These include 9, 11 and 15. It is suggested that the phrase "observation of event" or "shift supervisor's opinion" be used as EALs for these initiating conditions.

The licensee has not addressed Initiating Conditions No. 1, (ECCS initiated), 14e (turbine rotating component failure) and 15 (catch-all). As regards to No. 15, the text in section 4.1.1 does state that the shift supervisor can declare an Unusual Event if in his judgement the plant status warrants such a declaration. This should also be stated as an EAL in Table 4-1.

Initiating Condition No. 2 (radiological effluents). The relevant alarms and monitors should be listed. Back up sampling should not take more than 15 minutes.

Initiating Condition No. 3 (fuel damage indication). An EAL for rate of fuel failure is needed.

Initiating Condition No. 4 (abnormal coolant temperature or pressure or abnormal fuel temperatures). An EAL for high fuel temperature should be added.

Initiating Condition No. 10 (fire within the plant lasting more than 10 minutes). The licensee's EAL is nonconservative as it requires the fire be in a vital area and require offsite support.

Initiating Condition No. 13b (high and low water). The low water level should be specified.

ALERT

A number of the initiating conditions were listed without accompanying EALs; this might have been done because, in many cases, observation of the event suffices. In these cases acceptable EALs are "observation of event" or "shift supervisor's opinion". The initiating conditions that this applies to are 10, 11, 15, 18b, and 20.

Initiating Condition No. 1 (severe loss of fuel cladding). An EAL for rate of fuel failures should be added.

Initiating Condition No. 4 (steam line break with significant primary to secondary leakage). The licensee failed to give detailed EALs for a steam line break. The suggestions of NUREG-0818 should be considered in developing an acceptable set of EALs.

Initiating Condition No. 6 (1000 times normal radiation). The requirement for a confirming survey should be dropped unless it can be done in 15 minutes. The relevant alarms and monitors should be listed.

Initiating Condition No. 12 (fuel handling accident). The requirement for visual confirmation should be dropped as this may not be possible during accident conditions.

Initiating Condition No. 13 (fire potentially affecting safety systems). The licensee's version of this initiating condition is nonconservative as it requires offsite support before declaration of an Alert.

Initiating Condition No. 14 (most or all alarms lost). The licensee's version of this initiating condition may be nonconservative as it also requires the loss of the station computer in addition to the alarms. Whether or not a plant can be brought to a safe shutdown with only information from the plant computer is not known to the reviewer.

Initiating Condition No. 17b (high and low water). An EAL for low water is required.

SITE EMERGENCY

Initiating conditions No. 3, 9, 16b, 17, and 18 were not addressed.

Initiating Condition No. 1 (LOCA). The licensee's EAL set is acceptable except that it is missing a subset (low subcooling margin concurrent

with decrease in reactor coolant pressure) useful in diagnosing TMI-2 type small LOCAs. The suggestions in NUREG-0818 should be considered in developing an acceptable EAL set.

Initiating Condition No. 5 (steam line break with primary to secondary leakage). The licensee did not give EALs for the steam line break. Secondly confirmation of radiation alarms by sample analysis is required. The suggestions of NUREG-0818 should be considered in developing an acceptable set of EALs for the steam line break. The declaration of the emergency should not be delayed more than a few minutes for sample analysis.

Initiating Condition No. 8 (loss of hot shutdown capability). The licensee did not prepare EALs for this Initiating Condition. The suggestions of NUREG-0818 should be considered in developing an acceptable EAL set.

Initiating Condition No. 11 (fire). No EALs were provided probably because observation of the event suffices. In this case, either "observation of the event" or "shift supervisors opinion" would be suitable EALs.

Initiating Condition No. 12 (all alarms lost for over 15 minutes). The licensee's EAL set may be nonconservative because loss of the station computer is also required.

Initiating Condition No. 15b (low water) and 15c (high winds). An EAL is needed for low water. The requirement for observed damage to a vital structure from high winds should be eliminated as it conflicts with the intent of the NUREG-0654 version of the Initiating Condition.

Initiating Condition No. 16a (aircrash affecting vital plant structures by impact or fire). The licensee's EAL requires that instrument readings indicate equipment problems. This is nonconservative as instrumentation may not indicate damage. For example a fire may not have reached vital equipment or some of the damaged equipment may not be called upon to operate (e.g. ECCS).

Initiating Condition No. 16c (toxic or flammable gas). Gas concentrations do not have to be at the toxic or flammable level. Concentrations need only be enough to make it difficult or dangerous to enter vital areas where lack of entry constitutes a safety problem.

GENERAL EMERGENCY

The licensee did not address Initiating Conditions 5 and 7. The recommendations of NUREG-0818 should be considered in arriving at acceptable EAL sets.

Initiating Condition No. 2 (loss of 2 out of 3 fission product barriers with potential loss of the third). The licensee's EAL set is incomplete. The suggestions of NUREG-0818 should be considered in arriving at a more complete EAL set.

Initiating Condition No. 4 (possible release of large amounts of radioactivity). The licensee's EALs are acceptable; however a "shift supervisors opinion" EAL should be added.