



ENTERGY

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R. F. Burski
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Nuclear Safety
Waterford 3

W3F1-93-0169
A4.05
PR

August 19, 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
Inservice Testing (IST) Plan - Pumps and Valves,
Revision 7, Change 4

Gentlemen:

Revision 7, Change 1 of the Waterford 3 Inservice Testing (IST) Plan - Pumps and Valves was submitted to the NRC by Entergy Operations, Inc. via letter no. W3F1-91-0468, dated September 3, 1991. This letter provides, by attachment, Revision 7, Change 4 of the IST Plan with revised relief requests in response to the staff's Safety Evaluation of Revision 7, Change 1 of the IST Plan, dated August 19, 1992. A summary of our responses to the staff's individual review of each relief request is also provided by attachment to this submittal.

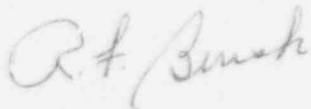
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If you have any questions concerning this submittal, please contact
B. R. Loetzerich at (504) 739-6636.

Very truly yours,



R.F. Burski
Director
Nuclear Safety

RFB/BRL/ssf
Attachment

cc: (w/Attachment 1) (w/o Attachment 2)
J.L. Milhoan, NRC Region IV
D.L. Wigginton, NRC-NRR
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office

Summary of Revised Relief Requests (Revision 7, Change 4 of the IST Plan)
in Response to NRR Safety Evaluation dated August 19, 1992

Relief Request 2.1.6-

Provisional relief was granted provided the pump vibration testing program complies with all the vibration testing requirements of ASME OM-6. The relief request was revised to include the given provision for compliance with ASME OM-6, for the granting of the relief.

Relief Requests 2.1.7, 2.1.8 and 2.1.9-

Interim relief for one year was granted for these three requests, until flow instrumentation could be installed on the emergency diesel fuel oil pumps or the testing methods could be evaluated. The flow instrumentation was installed during the past refueling outage and these relief requests are withdrawn. It is important to note that a Licensee Event Report was written prior to the last submittal of these relief requests, to document the identified non-compliance with applicable code requirements.

Relief Request 3.1.60-

This relief request was granted per NRC Generic Letter 89-04.

Relief Request 3.1.61-

Provisional relief was granted, provided the subject valves were identified in the IST plan as having a safety function in both the open and closed directions, and declares both valves in the pair as inoperable if a pair fails the backflow testing. The IST Plan was revised according to the requirements of this provision.

Relief Request 3.1.62-

Relief was denied and a revised relief request with additional justification was submitted to the NRC on November 17, 1992, via Entergy Operations, Inc. letter no. W3F1-92-0446. The NRC issued a safety evaluation on January 11, 1993, and concluded that the licensee proposal was in compliance with a later edition of the Code, and as such was acceptable and no relief was required.

Summary of Revised Relief Requests (Revision 7, Change 4 of the IST Plan)
in Response to NRR Safety Evaluation dated August 19, 1992

Relief Request 3.1.63-

Interim relief for one year was granted until the relief request could be revised or withdrawn, and full-stroke exercising of the valves at cold shutdown and refueling outages could be evaluated. This relief request was withdrawn and Clarification 3.2.28 was added with cold shutdown justification. The clarification delineates partial stroke exercising quarterly and full stroke exercising during cold shutdown, rather than disassembly during refueling outages.

Relief Request 3.1.64-

Provisional relief was granted provided the relief request was revised to indicate compliance with ASME PTC 25.3 -1976. The relief request was revised accordingly for the granting of the relief.

Relief Request 3.1.65-

Interim relief for one year was granted for evaluation of testing the reactor coolant system pressure isolation valves, until the relief request could be revised or withdrawn. This relief request has been expanded into three separate relief requests; 3.1.65, 3.1.75 and 3.1.76. Additional justification has been added to the basis for relief, and approved relief requests 3.1.16, 3.1.18 and 3.1.71 are referenced.

Relief Request 3.1.66-

Interim relief for one year was granted until the relief request could be revised or withdrawn. The relief request was withdrawn.

Relief Request 3.1.67-

Interim relief for one year was granted until the relief request could be revised or withdrawn. The relief request was revised to add verification of valve closure to be performed during local leak rate testing at cold shutdown frequency.

Relief Request 3.1.68-

Interim relief for one year was granted until the relief request could be revised or withdrawn. The relief request was revised to include additional justification in the basis for relief.

Summary of Revised Relief Requests (Revision 7, Change 4 of the IST Plan)
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Relief Request 3.1.69-

Provisional relief was granted. The relief request was revised to include the given provision for compliance with ASME OM-10, for the granting of the relief.

Relief Request 3.1.70-

Relief was denied. This relief request was withdrawn and reinstated as previous relief request 3.1.29.

Relief requests 3.1.71 and 3.1.72-

These relief requests were granted.