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April 4, 1983

L. V. MAURIN  
Vice President Nuclear Operations

W3183-0098

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

SUBJECT: Waterford 3 SES  
Docket No. 50-382  
Preservice Inspection Program

Dear Sir:

In a telephone conversation on March 15, 1983, we provided Mr. Martin Hum of your Materials Engineering Branch with information regarding the current status of Preservice Inspection (PSI) activities, including requests for relief. At his request, we have prepared this letter to advise you of same.

The Reactor Vessel and Head, the two (2) Steam Generators, and the Pressurizer were examined at the manufacturer's shop prior to shipment in accordance with the 1974 Edition through Summer 1974 Addenda of ASME Section XI. Information regarding these examinations, including requests for relief, has been submitted.

The volumetric (UT) and surface (PT and MT) examinations on the balance of items in the PSI Program were performed by the Virginia Corporation of Richmond in accordance with the 1977 Edition through Summer 1978 Addenda of Section XI, modified as required by 10CFR50.55(a). Preparation of plans and procedures for this portion of the program began in July, 1981; examinations commenced in February, 1982 and were completed in January, 1983. The Final Report for these examinations is currently being prepared and will include all requests for relief applicable to this part of the program. We anticipate that this report will be ready for submittal by July 1, 1983. As we indicated to Mr. Hum, we will attempt to provide a draft copy for his information by May 1, 1983. Requests for relief will be submitted for the following:

1. Partial examinations - a full listing of items which could not be completely examined to the extent required by Code will be provided, including the approximate percentage missed and a description of steps taken to minimize unexamined areas.
2. No examinations - requests in this category will include welds inside containment penetration assemblies, which are totally

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enclosed in guard pipes and thus are completely inaccessible, and one (1) twelve-inch, Schedule 160 surge line weld which is located approximately halfway through a four-foot concrete wall and is also inaccessible. No others are known at this time.

3. Alternative examinations - requests in this category will address areas where examinations other than those required by Code were performed with the intent of more adequately addressing generic problems which have developed (e.g. IGSCC). The most significant request in this area involves a 10-percent volumetric sampling of safety injection and containment spray suction piping in lieu of the surface examinations required by Code.

Other requests in this category may include the use of manufacturers' Section III NDE reports to satisfy PSI requirements. Examples are RC Pump Casing Welds and surface examinations for some bolting materials.

We do not anticipate any additional relief requests for this portion of the PSI Program. Furthermore, no conditions were observed during the performance of the examinations which would indicate that any requests will be generated which are not standard throughout the industry.

The eddy current examinations of the two (2) Waterford 3 Steam Generators were performed by Conam inspection in October and November, 1981. No relief requests are anticipated in this area for PSI.

The Visual Inspection Program is being conducted by LP&L examiners in accordance with the 1980 Edition through Winter, 1980 Addenda of Section XI. Examinations began in March, 1983 after the initiation of Hot Functional Testing and are expected to be complete by fuel load. We do not anticipate that any requests for relief will be submitted for this portion of the PSI Program, with the possible exception of pump and valve internals. Consideration is being given, however, to filing a request for relief from the VT-4 requirement for snubbers during ISI, since the surveillance testing required by Plant Technical Specifications is more stringent and more thorough than Section XI requirements.

In another telephone conversation with Mr. Hum on March 22, 1983, two questions were asked, the answers to which are provided below.

1. Line numbers 1SI4-37 and 1SI4-38 which appeared in an earlier submittal have been deleted. Is this a typographical error?

Line numbers 1SI4-37 and 1SI4-38 were deleted from the Nuclear Piping Line List because they were deleted from the design and

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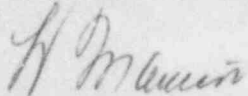
do not appear in the as-built system.

2. Does LP&L intend to request exclusion under IWA-3000(f) of the 1980 Section XI ASME Code?

IWA-3000(f) has been removed from the Waterford 3 Program. It was replaced by the applicable Pressure and Temperature Exemptions of subsection IWC.

We hope the information contained in this letter provides you with sufficient detail. Please advise if we can be of assistance.

Very truly yours,



L. V. Maurin

LVM/DEB:keh

cc: E. L. Blake, W. M. Stevenson, J. Wilson (NRC), M. Hum (NRC),  
Tom Taylor (Battelle)