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Director
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Waterford 3

W3F1-94-0166

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November 22, 1994

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
Generic Letter 89-19 "Safety Implication of Control
Systems in LWR Nuclear Power Plants"

Gentlemen:

The NRC on January 28, 1991 issued a memorandum from the NRC Chief, Instrumentation and Control Systems Branch, to the NRC Director, Division of Systems Technology, summarizing a presentation made by the Combustion Engineering Owners Group (CEOG) on November 20, 1990, on Generic Letter 89-19. The CEOG presented an analysis to show that the safety benefits of implementing the Steam Generator Overfill Protection System (SGOPS) are not significant. The CEOG presentation focused on operator failure probability, steam generator tube rupture probability, the main steam line break (MSLB) location, operator action, and the negative impact of overfill protection. Paragraphs A through E of the January 28, 1991 NRC letter discussed these items.

Waterford 3 was instrumental in developing the CEOG position, and the November 20, 1990 presentation was made by Waterford 3 personnel. We endorse the CEOG position, and the analysis presented by the CEOG and summarized in the January 28, 1991 NRC letter is applicable to Waterford 3.

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Waterford 3 will complete a documented assessment by December 31, 1994 to determine whether emergency procedures and operator training need to be enhanced to provide additional protection for prevention of steam generator overfill. If necessary, appropriate procedural or training enhancements will be implemented by December 31, 1995.

On a separate issue, Enclosure 2 of Generic Letter 89-19, paragraph (4)(c), recommends a reassessment of emergency procedures and operator training for small-break loss of coolant accidents for plants designed with high-pressure-injection pump-discharge pressures less than or equal to 1275 psi. This recommendation is not applicable to Waterford 3. The Waterford 3 high-pressure-injection pump-discharge-pressure must be greater than or equal to 1429 psid pursuant to Technical Specification Surveillance Requirement 4.5.2.f.1.

Please contact me or Robert J. Murillo (504) 739-6715 should there be any questions regarding this letter.

Very truly yours,



R.F. Burski
Director
Nuclear Safety

RFB/RJM/tmm

cc: L.J. Callan, NRC Region IV
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