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MIDDLE SOUTH UTILITIES SYSTEM

January 11, 1984

W3K84-0064
Q-3-A35.07.136

Mr. John T. Collins
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

REFERENCE: Telecon C. Hooper (LP&L) and W. Crossman (NRC IV) on December 8, 1983

Dear Mr. Collins:

SUBJECT: Waterford SES Unit No. 3
Docket No. 50-382
Potentially Reportable Deficiency No. 136
"Containment Purge Valves, Improper Actuation of"
Final Report

On December 8, 1983, a problem with the actuation of the Containment Purge Valves was reported as Potentially Reportable Deficiency No. 136. Further evaluation of the previously described condition indicates this condition is not considered reportable pursuant to the requirements of 10CFR50.55(e).

EVALUATION

It was determined that the CPV's actuate as follows on CIAS and Hi-Radiation.

CIAS: Upon CIAS the CPV's Makeup (2HV-B150B, 151A, 152A) and Exhaust (2HV-B155A, 154B, 153B) receive a direct emergency signal to close.

Upon SIAS, the RAB Ventilation Exhaust Fans (E-22 (3A), (3B)) trip.

The only combination of events that would lead to the CPV's reopening would be clearing of the emergency signal, and a spurious failure in the non-IE CP-50 PAC logic. (Loss of power to CP-50 would maintain the CPV's closed).

IE-27

Hi-Radiation:

Upon a high radiation from the plant stack or containment area monitors, the CPV's close; the E-22 fans do not receive a signal to trip.

If the Hi-Rad signal clears before the variable inlet valve (VIV) passes thru the normal setting from the purge setting, the valves will reopen.

If the Hi-Rad signal does not clear until after the VIV passing thru the normal setting, the CPV's will only reopen if the operator moves the selector switch to Normal and then to Purge.

The concern is whether the intent of our commitment to NRC IE Bulletin 80-06 (see response to FSAR Question 030.35) which prohibits components from returning to their pre-emergency state upon system level ESFAS reset, is met. In the case of CIAS, the intent of IEB 80-06 is met in that there is no automatic resetting of components unless both the ESFAS signal clears and either the E-22 fans are actuated or there is a spurious failure in the CP-50 logic.

In the case of high-radiation, there is the possibility of the CPV's opening if the high-rad clears prior to the VIV passing thru the normal purge setting. This is mitigated, however, by two important facts. First, a high rad signal from either the containment or the plant stack monitors must clear, drastically reducing the possibility of the signal clearing when not appropriate. Second, Waterford-3 is bound by a Technical Specification which allows only 90 hours per year of purging in Modes 1 thru 5. Under the terms of NRC Branch Technical Position CSB 6-4, a radiological off-site dose analysis is not required for Waterford if subject to such a Tech. Spec. The rationale behind this is that such limited purge time makes the possibility of a radiological accident with the CPV's open very small.

In view of the above, PRD-136 is considered not reportable.

Very truly yours,

T. F. Gerrets

T. F. Gerrets
Quality Assurance Manager

TFG:CNH:JC

cc: Director
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