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September 29, 1983

W3P83-2936
3-A1.01.04

Director of Nuclear Reactor Regulation
Attention: Mr. G.W. Knighton, Chief
Licensing Branch Number 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Waterford SES Unit 3
Docket No. 50-382
Implementation Schedules for SPDS and Regulatory Guide 1.47

REFERENCES: (1) W3P83-2215 dated July 5, 1983, "Revised Response to
NUREG-0737, Supplement 1-SPDS"
(2) W3P83-1542 dated May 23, 1983, "Inadequate Core
Cooling Instrumentation"

Dear Sir:

Implementation of the SPDS and Regulatory Guide 1.47 (Bypassed and Inoperable Status Indication) requirements at Waterford 3 is accomplished mainly through the development of software systems designed to operate on the Plant Monitoring Computer (PMC). The software will be written and functional before loading fuel, however, due to higher priority software systems that must be integrated on the PMC, the SPDS and Regulatory Guide 1.47 software will not be integrated for completion of pre-operational testing prior to licensing. We intend to have both systems operational prior to exceeding the 5% power level.

In the Reference (1) letter LP&L provided the NRC with a schedule for implementing the NUREG-0737 Supplement 1 requirements for SPDS. By this letter we are amending the completion dates for operator training and an operational SPDS from the fuel load schedule of Reference (1) to our present schedule of 5% power.

For the period from fuel load to 5% power Waterford operators will have available the QSPDS - a backup system to the SPDS. The QSPDS, which monitors, processes and displays Inadequate Core Cooling Instrumentation (ICCI) information, is described in detail in Reference (2) and FSAR Appendix 1.9A. In addition to its ICCI function the QSPDS monitors a sufficient subset of the SPDS parameters to provide reliable indication of the status of the five critical safety functions defined in Supplement 1 to NUREG-0737. Included as an attachment to this letter is a listing of the parameters available for display on the Waterford QSPDS.

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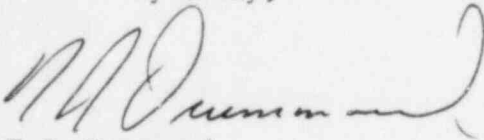
The Bypassed and Inoperable Status Panel (BISP) as required by Regulatory Guide 1.47 is intended as a backup to administrative procedures. For the period from fuel load to 5% power the Waterford operators will have a diversity of information sources as to the inoperable status of safety-related systems. Administrative procedures (such as OP-100-010, "Status Control") require, among other things, a status board maintained by the Nuclear Operations Supervisor (NOS), shift turnover status sheets, and NOS and control room logs. Should the operator determine that additional status indication is necessary the BISP may be used in manual mode without computer support.

In Section 7.5.3 of the Waterford SER it is noted that "prior to plant operation, NRC is to inspect operation" of the BISP. Providing an operable BISP prior to exceeding 5% power is consistent with the inspection schedule presented by the NRC.

Although NRC approval of the 5% power schedule for SPDS and BISP implementation is not strictly required at this time, we request such approval in a timely manner to support evaluation of Waterford's fuel load schedule.

Should you have any questions or comments on this matter please contact Mike Meisner at (504) 363-8938.

Yours very truly,



F.J. Drummond
Manager, Engineering & Technical Services

FJD/MJM/ch
Attachment

cc: W.M. Stevenson, E.L. Blake, J. Wilson (NRC), G.L. Constable (NRC - Resident Inspector)

QSPDS

Critical Safety Function	Parameter
Reactivity Control	-Neutron Flux -Boron Concentration
Reactor Core Cooling and RCS Heat Removal	-PZR Pressure -PZR Level -T-Core Exit -Injection Flows -Pressure and Temperature Saturation Margins -Steam Generator Pressure -Feedwater Flow -Hot and Cold Leg Temperature
Reactor Coolant System Integrity	-Primary to Secondary Pressure -PZR Level -Containment Sump Level -Containment Pressure -Charging/Letdown Flow
Radiation Control	-9 Radiation Monitors
Containment Conditions	-Containment Pressure -Containment Temperature -Containment Hydrogen Concentration -Shutdown Cooling Temperature