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Waterford 3

W3F1-95-0080  
A4.05  
PR

May 12, 1995

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  
Response to NRC Questions on Technical Specification Change  
Request NPF-38-146

Gentlemen:

On December 6, 1993 Waterford 3 submitted Technical Specification Change Request (TSCR) NPF-38-146 to the NRC (letter # W3F1-93-0180) which would allow the installation of tube sleeves as an alternative to plugging defective Steam Generator tubes. The request proposed the use of Combustion Engineering (CE) Leak Tight Sleeving, Westinghouse Laser Welded Sleeves, or Babcock and Wilcox Nuclear Service (BWNS) Kinetic Sleeve Design. The purpose of this letter is to revise TSCR NPF-38-146 to allow the use of the CE Leak Tight Sleeving only, removing the Westinghouse and BWNS sleeving designs from the proposal. This change will affect Technical Specification 4.4.4.4(b) and the associated Bases of the previously submitted TSCR. Waterford 3 requests that the references to the Westinghouse and BWNS sleeving processes be removed from these sections of the TSCR.

Waterford's desire to remove the Westinghouse and BWNS sleeving processes from TSCR NPF-38-146 was informally communicated to the NRC during a conference call on April 12, 1995 with the Waterford 3 Project Manager and members of the Materials Engineering Branch of NRR. During this call the NRC requested additional information in regard to the TSCR. The first item requested was a description of inspection/examination

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methods which will be performed once sleeves are installed. Waterford 3's response to this request is as follows: As described in CEN-605-P, "Waterford 3 Steam Generator Tube Repair Using Leak Tight Sleeves," all sleeve welds will be examined using the ultrasonic (UT) inspection method and acceptance criteria developed by CE. Additionally, a base line eddy current test will be performed on each new sleeve, utilizing suitable tooling and/or processes which have been industry accepted and approved. As for periodic examinations of the installed sleeves subsequent to the post-installation testing, Waterford 3 will examine at a minimum a 20% sample per steam generator each cycle in accordance with EPRI NP-6201, "PWR Steam Generator Examination Guidelines."

The second item requested was a description of the Quality Control measures which will be implemented at Waterford 3 to monitor CE's sleeving activities. Waterford 3 understands that it is our responsibility to provide assurance that vendors perform quality related work in accordance with contractual technical and quality requirements. This is accomplished through Site Procedure W5.601, "Contractor Control," which ensures the following controls are in place: review of inspection/NDE certification personnel records; review and approval of procedures for technical and quality adequacy; performing onsite QA surveillance/audits of vendor processes; and Contractor drawings affecting Waterford 3 configuration submitted to Design Engineering for review.

Additionally, Waterford 3's Design Engineering Programs Engineering will ensure that procedural commitments stated in NOECP-252, "Steam Generator Eddy Current Inservice Testing" specific to tube plugging will also be invoked for the tube sleeving process. This will ensure that tubes to be sleeved are located and position verified by Row/Line numbers utilizing steam generator tubesheet maps and video/photography prior to the installation process utilizing site QA/QC personnel.

This request has no effect on the No Significant Hazards Determination originally submitted.

We respectfully request a timely review in an effort to achieve maximum efficiency during our upcoming refueling outage (September, 1995), in the event that steam generator sleeving should be desired.

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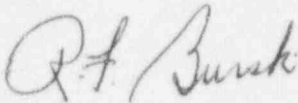
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Should you have any further questions or comments concerning this request, please contact D.F. Litolff at (504) 739-6693.

Very truly yours,



R.F. Burski  
Director  
Nuclear Safety

RFB/DFL/tjs

cc: L.J. Callan, NRC Region IV  
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R.B. McGehee  
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