



**LOUISIANA  
POWER & LIGHT**

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April 12, 1984

W3P84-1009

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3-A20.20

Q-3-B31

Director of Nuclear Reactor Regulation  
Attention: Mr. G.W. Knighton, Chief  
Licensing Branch No. 3  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Waterford SES Unit 3  
Docket No. 50-382  
Auxiliary Pressurizer Spray (APS)

REFERENCE: (1) Letter dated March 30, 1984  
from Knighton (NRC) to Leddick (LP&L)  
(2) W3P84-0505 dated February 29, 1984

Dear Sir:

In your Reference (1) letter you requested that LP&L provide a schedule committing to resolve the Staff concerns in regard to a potential single failure vulnerability in the APS System. Specifically, to address the Staff's concerns you requested justification sufficient to demonstrate that the Waterford APS design meets the criteria of BTP RSB 5-1, and the criteria for systems required for steam generator tube rupture (SGTR) accident mitigation.

As to the criteria of BTP RSB 5-1, Supplement 3 to the Waterford SER (Section 5.4.3) indicates that we meet the BTP requirements. Furthermore, Reference (2) transmitted CEN-259, "An Evaluation of the Natural Circulation Cooldown Test Performed at the San Onofre Nuclear Generating Station; Compliance With the Testing Requirements of Branch Technical Position RSB 5-1". While CEN-259 demonstrated the applicability of the SONGS natural circulation/boron mixing test to Waterford 3, it also reaffirmed our compliance with BTP RSB 5-1. In particular it was demonstrated (in Sections 6.2 and 6.3) that the APS is not necessary for meeting the functional requirements of BTP RSB 5-1; rather, in the unlikely event that the APS is unavailable the final plant depressurization can be accomplished using the safety-grade reactor coolant gas vent system. We feel, therefore, that your request for information on BTP RSB 5-1 has already been adequately met and we have no plans for a further submittal.

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As to the APS/SGTR issue, following discussions with your Mr. T. Marsh, the following schedule was agreed upon:


1. An acceptable justification for interim operation will be submitted to the NRC prior to exceeding 5% power.

2. Resolution of the SGTR issue should be reached within six months of receipt of the low power operating license. Hardware changes, if necessary, will be completed on a schedule to be negotiated at a later time, however, not prior to the first refueling outage.

It is our understanding that these commitments will form the basis for a license condition for Waterford 3. We request that the wording of the license condition be clear insofar as only the APS/SGTR aspect of Reference (1) remaining for LP&L action, and issue "resolution" not requiring backfit implementation.

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

Yours very truly,



K.W. Cook  
Nuclear Support & Licensing Manager

KWC/MJM/pc

cc: E.L. Blake, W.M. Stevenson, J.T. Collins, D. M. Crutchfield,  
J. Wilson, G.L. Constable, T. Marsh, C. Liang