



LOUISIANA
POWER & LIGHT

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April 25, 1984

ROTH S. LEDDICK
Senior Vice President
Nuclear Operations

W3P84-1136
3-A1.16.07

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

SUBJECT: Waterford SES Unit 3
Docket No. 50-382
Plant Readiness for Fuel Load

Dear Mr. Denton:

Louisiana Power and Light is submitting this letter to verify that the design, construction and testing of Waterford SES Unit No. 3 has essentially been completed in accordance with the Final Safety Analysis Report and other licensing documents, and that the unit will be ready to load fuel by May 30, 1984.

The attachments to this letter identify those activities that are incomplete at this time, but do not preclude issuance of an operating license and/or fuel loading. These activities, along with those which remain open but will be completed prior to issuance of an operating license, will continue to be performed and tracked in accordance with established procedures to ensure that licensing requirements are met.

Louisiana Power and Light Company has concluded that the incomplete status of the items included herein at the time of fuel loading and/or low power testing will have no adverse impact to the safe operation of the plant or the health and safety of the general public. Additionally, the Safety Review Committee (SRC) for Waterford 3 has reviewed the attachments for their safety significance.

Louisiana Power and Light Company therefore requests that an operating license be granted for Waterford 3.

Yours very truly,

R. S. Leddick
Sr. Vice President, Nuclear Operations

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Attachments: I - Activities which may not be completed by May 30, 1984.
II - Anticipated Conditions of License.
III - Initial Test Programs/Systems which may not be completed/accepted by core load.
IV - Significant Construction Deficiencies for which corrective action may not be completed by May 30, 1984.
V - I & E findings for which corrective actions may not be completed by May 30, 1984.

cc: Mr. G. W. Knighton, NRC - Bethesda
Mr. D. M. Crutchfield, NRC - Bethesda
Mr. J. T. Collins, NRC - Region IV
Mr. J. Wilson, NRC - Bethesda
Mr. G. L. Constable, NRC - Waterford 3
Mr. E. L. Blake
Mr. W. M. Stevenson

NS20153

ATTACHMENT I

Activities which may not be completed by May 30, 1984

- 1) Anticipated Conditions of License
(Refer to Attachment II).
- 2) All initial test programs/systems required for Fuel Load (LP&L letter W3P84-0735, K. W. Cook to G. W. Knighton, March 20, 1984) shall be under control of the Plant Staff prior to loading fuel. In addition, those systems not required to support fuel loading which may not be accepted by May 30, 1984 are listed in Attachment III.
- 3) Significant Construction Deficiencies (SCD).
(Refer to Attachment II).
- 4) I & E Findings (Refer to Attachment V).
- 5) All open items required for entry into Mode 6 will be completed prior to loading fuel.

ATTACHMENT II

Anticipated Conditions of License

1. Maximum Power Level

Louisiana Power and Light Company is authorized to operate the facility at reactor core power levels not in excess of 3390 megawatts thermal (100%) power.

2. Technical Specifications and Environmental Protection Plan

The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. Antitrust Conditions

Louisiana Power and Light Company shall comply with the antitrust conditions of the license.

4. Fuel Rod Pressure Approval Only Up to 39.1 GWd/t (Section 4.2.2.2, SER)

The licensee shall not exceed 39.1 GWd/t rod-average burnup for its CE 16 x 16 fuel.

5. LER Required on Spurious Operation or Malfunction of Megawatt Demand Setter (MDS) or Reactor Power Cutback System (Section 7.7.3.3, SER)

The licensee shall report inadvertent or spurious operation or malfunction of the MDS or Reactor Power Cutback system for at least the first two fuel cycles of operation. Subsequently, the licensee may review and submit the operating experience gained with these systems and request relief from the reporting requirement.

6. Single Failure of Control System (Section 7.7, SSER 1)

Prior to startup after the first refueling outage, the licensee must conduct a review to identify any power sources or sensors which provide power or signals to two or more control systems and to demonstrate that failure or malfunctions of their power sources or sensors will not result in consequences outside of the bounds of FSAR analyses or beyond the capability of operation of safety systems.

7. Initial Inservice Inspection Program (Section 6.6, SSER 5)

Within 6 months after reaching commercial operation, the licensee must submit an initial inservice inspection program for staff review and approval.

8. Environmental Qualification (Section 3.11, SSER 5)

LP&L shall environmentally qualify all electrical equipment as required by 10 CFR 50.49.

ATTACHMENT II (CONT'D)

Anticipated Conditions of the License

9. Axial Growth (Section 4.2, SSER 5)

The issue of shoulder gap clearance in CE 16 x 16 fuel must be resolved before the second cycle of operation for Waterford 3. Should generic resolution not be reached before the second cycle, the staff will consider favorable visual surveillance results for a representative sample of the assemblies.

10. Heavy Loads (Section 9.1.4, SSER 5)

Prior to startup following the second refueling outage, LP&L shall have made commitments acceptable to the NRC staff regarding any changes and modifications required to fully satisfy the guidelines of Sections 5.1.2 through 5.1.6 of NUREG-0612 (Phase II: nine-month responses to the NRC Generic Letter on control of heavy loads, dated December 22, 1980).

11. PWR Startup or Operating Experience (Section 13, SSER 6)

During the startup test program, the licensee shall have on each shift a licensed individual with previous startup or operating experience on a comparable PWR, or an advisor who meets these experience requirements.

12. Emergency Preparedness (Section 13.3, SSER 5)

- a. Satisfactory FEMA supplemental findings and determinations of offsite preparedness must be submitted before exceeding 5% of rated power.
- b. Before operation above 5% of rated power, the licensee shall comply with the requirements of 10 CFR 50.47(a) (c) and Appendix E, Section IV.F, regarding emergency preparedness exercises.
- c. In the event that the NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's final rule, 44 CFR Part 350, is an indication that a major substantive problem exists in achieving or maintaining an adequate state of preparedness, the provisions of 10 CFR Section 50.54(s)(2) will apply.

13. Fire Protection (Section 9.5.1, SSER 5)

The licensee shall maintain in effect all provisions of the approved fire protection program.

ATTACHMENT II (CONT'D)

Anticipated Conditions of the License

14. Initial Test Program (Section 14, SER)

The licensee shall conduct the post-fuel-loading initial test program described in Chapter 14 of the FSAR, as amended, without making any major modifications unless such modifications have prior NRC approval.

15. Emergency Response Capabilities (Generic Letter 82-33, Supplement 1 to NUREG-0737)

LP&L shall complete the following emergency response capabilities no later than the following dates:

- | | | |
|----|---|------------------|
| a. | Safety Parameter Display System fully operational and operators trained. | 5% Power |
| b. | Detailed Control Room Design Review (Program Plan/Summary Report Submittal) | January 31, 1985 |

ATTACHMENT III

Initial Test Programs/Systems which may not be Completed/Accepted by Core Load

System No.	System Description	Priority
13B	Heat Tracing Non-Safety	Post Fuel Load
15	Start-up Test SPO-120	Post Fuel Load
32	Sump Pumps Drainage	Post Fuel Load
40-08	Turbine Gantry Crane	Post Fuel Load
40-10	SGFP Crane	Post Fuel Load
45	Misc. Area HVAC	Post Fuel Load
46B3	RAB Toxic Chemical Monitors	Post Fuel Load
46H	RAB Misc. HVAC	Post Fuel Load
54-1	Post Accident Sampling System	Post Fuel Load
55G	Solid Waste Mgnt.-Post Startup	Post Fuel Load
55J1	Filter Transfer	Post Fuel Load
55K1	Portable Demin Taps	Post Fuel Load
55K2	Additional Waste Tankage	Post Fuel Load
71C	Condensate Polishing	Post Fuel Load
72C	Auxiliary Feedwater Pump	Post Fuel Load

ATTACHMENT IV

Open Significant Construction Deficiencies which may
not be Completed Prior to May 30, 1984

SCD-37	Temperature Detectors (RTD's) failure. (Post-Core Hot Functional Testing) - ECD-07/15/84.
SCD-57	Inadequate I & C installation and turnover documentation. ECD-05/20/84.*
SCD-60	Turnover Documentation and Inadequate hanger weld problems. ECD-05/25/84.*
SCD-80	Unsatisfactory stroking of EFW pump turbine steam shutoff valve. (Post-Core Hot Functional Testing) - ECD-07/13/84.
SCD-93	Charging and letdown containment isolation valve deficiencies (Post-Core Hot Functional Testing) - ECD-07/01/84.
SCD-105	Electrical Separation Deficiencies. ECD-05/23/84.*

* LP&L Action Complete Prior To May 30, 1984. NRC Closure May Be Pending On May 30, 1984.

ATTACHMENT V

I & E Findings for which Corrective Actions may not be Completed Prior to May 30, 1984

Number	Description	ECD
82-11-09	Air cleaning system incomplete.	05/30/84*
82-11-12	Transportation activities.	Prior to Radwaste Shipment - 12/31/85
82-12-10	Post Accident Sampling System (PASS).	5% Power - 06/15/84
83-08-22	Post Accident Sampling and Analysis Equipment.	06/08/84
83-08-24	Containment air sampling and analysis equipment.	06/08/84
83-08-38	Make provisions and include arrangements for additional telephone service.	12/84
83-08-62	Emergency notification in high noise areas.	08/01/84
83-08-115	Dissemination of Emergency information to the transient population.	07/16/84
83-08-116	Operational testing of siren warning system.	07/16/84
84-02-03	Finalize Lesson Plans for training offsite personnel.	06/15/84
84-02-04	Revise the training lesson plan for dose assessment.	06/15/84
84-02-05	Include hierarchy for the selection of meteorological data into EP-2-050.	06/15/84

* LP&L Action Will Be Complete Prior To Initial Criticality.

ATTACHMENT V (CONT'D)

I & E Findings for which Corrective Actions
may not be Completed Prior to May 30, 1984

Number	Description	ECD
84-02-06	The same units for specifying meteorological tower heights should be used in both the procedures and control room displays.	06/15/84
84-02-07	Additional walkthroughs with control room personnel should be performed for EP-2-050, EP-2-051 and EP-2-052.	06/15/84
84-05-02	NUREG-0737 (Item II.B.3) Post Accident Sampling Capability.	06/15/84