ENTERGY

Entergy Operations, Inc.
P.O. Box B
Killona, LA 70066
Tel 504 739 6774

R. F. Burski
Director
Nuclear Safety
Waterford 3

W3F1-95-0034
A4.05
PR

March 9, 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
Request for Additional Information Regarding
Technical Specification Change Request NPF-38-116

Gentlemen:

By letter dated July 18, 1991, as supplemented by letters dated March 16 and December 2, 1994, Waterford 3 proposed a change to Technical Specification (TS) 3/4.7.6, "Control Room Air Conditioning System."

By letter dated February 7, 1995, the NRC review staff issued a request for additional information (RAI) in order to complete their review. Several modifications to the proposed TS have been incorporated as a result of providing additional clarifications. Where clarification was determined necessary to further define the intent of the proposed Limiting Conditions for Operation (LCOs), the proposed TS were modified conservatively such that the no significant hazards determination provided with the original submittal remains valid. The modifications are described herein and appear in Attachment B.

Waterford's response to the RAI is as follows:

Request Proposed ACTIONs 3.7.6.4.a and 3.7.6.4.b do not clearly specify the valve configurations that would result in entry to these action statements. Clarify these ACTION statements and describe how the isolation function is maintained for the 7 day allowed outage time with no action under the ACTION statement, assuming no additional failures.

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Response **NOTE**: 3.7.6.4 a and b have been changed to 3.7.6.5.a and b due to improvements made to 3.7.6.3. LCO 3.7.6.3 has been divided into two LCOs to address MODES 1-4 and MODES 5 and 6. Refer to the revised "Attachment B" enclosed.

TS 3.7.6.5.a has been changed to include a provision to "maintain at least one isolation valve in the flowpath OPERABLE". This will ensure that an isolation function will be maintained for the 7 day allowed outage time of the ACTION.

TS 3.7.6.5.b has been changed to include a provision to "maintain at least one of the series isolation valves in a flowpath OPERABLE". This will insure that each flowpath will maintain its isolation function for the 7 day allowed outage time of the ACTION. The associated BASES has been revised to reflect the change. Refer to the revised "Attachment B" enclosed.

Request Also, describe how inoperable emergency intake valves under proposed ACTION 3.7.6.4.b would be addressed under proposed Technical Specifications 3.7.6.1 and 3.7.6.2 for the emergency air filtration trains.

Response The Emergency Outside Air Intake Isolation Valves, HVC-201A(B), HVC-202A(B), HVC-203A(B), and HVC-204A(B) are provided to isolate the emergency outside air intake during normal, high radiation or toxic gas operating modes. These valves have no control scheme that affect the emergency filter trains and need not be addressed in TS 3.7.6.1 or 3.7.6.2. However, during a radiological emergency, the accident analysis assumes a positive pressure in the control room to minimize non filtered inleakage. To maintain a positive pressure in the control room envelope, an operator would examine the radiation monitor outputs and open the intake point with the lowest radiation level. FSAR Figure 6.4-2 (See Attachment A) represents the operator option of manually initiated filtered pressurization.

An additional ACTION (3.7.6.5.c) is incorporated in the proposed change to clarify and preserve the LCO operability requirement. The associated BASES provides further clarification. Refer to the revised "Attachment B" enclosed.

Request — Proposed ACTION 3.7.6.3.b would allow 3 hours to restore an inoperable AH-12 cooling unit to OPERABLE status with two units initially inoperable before requiring action to place the unit in HOT STANDBY. This is a relaxation from the currently allowed 1 hour period to restore an inoperable unit to OPERABLE status under Technical Specification 3.0.3. The technical justification provided in amendment request states that this proposed change is supported by the Waterford 3 Station Blackout analysis. However, the control room conditions during station blackout events are not representative of control room conditions during normal operation following design basis events. Therefore, provide technical justification that demonstrates the capability to place the plant in HOT STANDBY in an orderly manner without control room cooling, or propose an alternate action statement.

Response — Waterford agrees that this specification should be consistent with the requirements established by Technical Specification 3.0.3. Therefore, the proposed specification has been modified by combining ACTIONs b and d, and revising the 3 hour requirement to read "within 1 hour". In addition, a temperature requirement has been included into ACTIONs a and b. The LCO is maintained by keeping the control room temperature at less than or equal to 80°F. Action to shutdown within 1 hour will be required when this capability is lost. Refer to the revised "Attachment A" enclosed.

To provide further clarification, a new TS, 3.7.6.4, Control Room Air Temperature, to specifically and separately address MODE 5 and 6 requirements is provided. The MODE 5 and 6 requirements for the control room air conditioning units will be consistent with the MODE 5 and 6 requirements of the control room emergency air filtration train (S-8). The addition of this LCO requires that the previous 3.7.6.4 be renumbered to 3.7.6.5, Control Room Isolation and Pressurization. Refer to the revised "Attachment B" enclosed.

Request — Proposed Action 3.7.6.4.c would implement an allowed outage time for breaches in the control room envelope, which is also a significant relaxation. The technical justification provided in the amendment request is that simple temporary actions can effectively protect control room personnel. This statement appears justified for small penetrations in the envelope (i.e., less than 1 square foot in area) or penetrations with permanent sealing mechanisms (e.g., blocking open or removing doors), but the proposed ACTION does not restrict the size or type of breach in the control room envelope in any way. Consequently, provide justification that demonstrates the capability to effectively seal envelope breaches of any size or type, or propose restrictions on the size and type of identified envelope breaches.

Response — Upon review of Technical Specification (new number) 3.7.6.5 Waterford 3 agrees that the allowable penetrations should be small ($\leq$1 square foot) or limited to penetrations with permanent sealing mechanisms. Therefore, Waterford has revised the LCO to include an asterisk and a note specifying restrictions to size and type of penetration allowed in the control room envelope. Additionally, 3.7.6.5.c.2 has been clarified to separate the MODE 1-4 requirements from the MODE 5 and 6 requirements. Refer to the revised "Attachment B" enclosed.

If you should have any questions concerning the above, please contact Paul Caropino at (504) 739-6692.

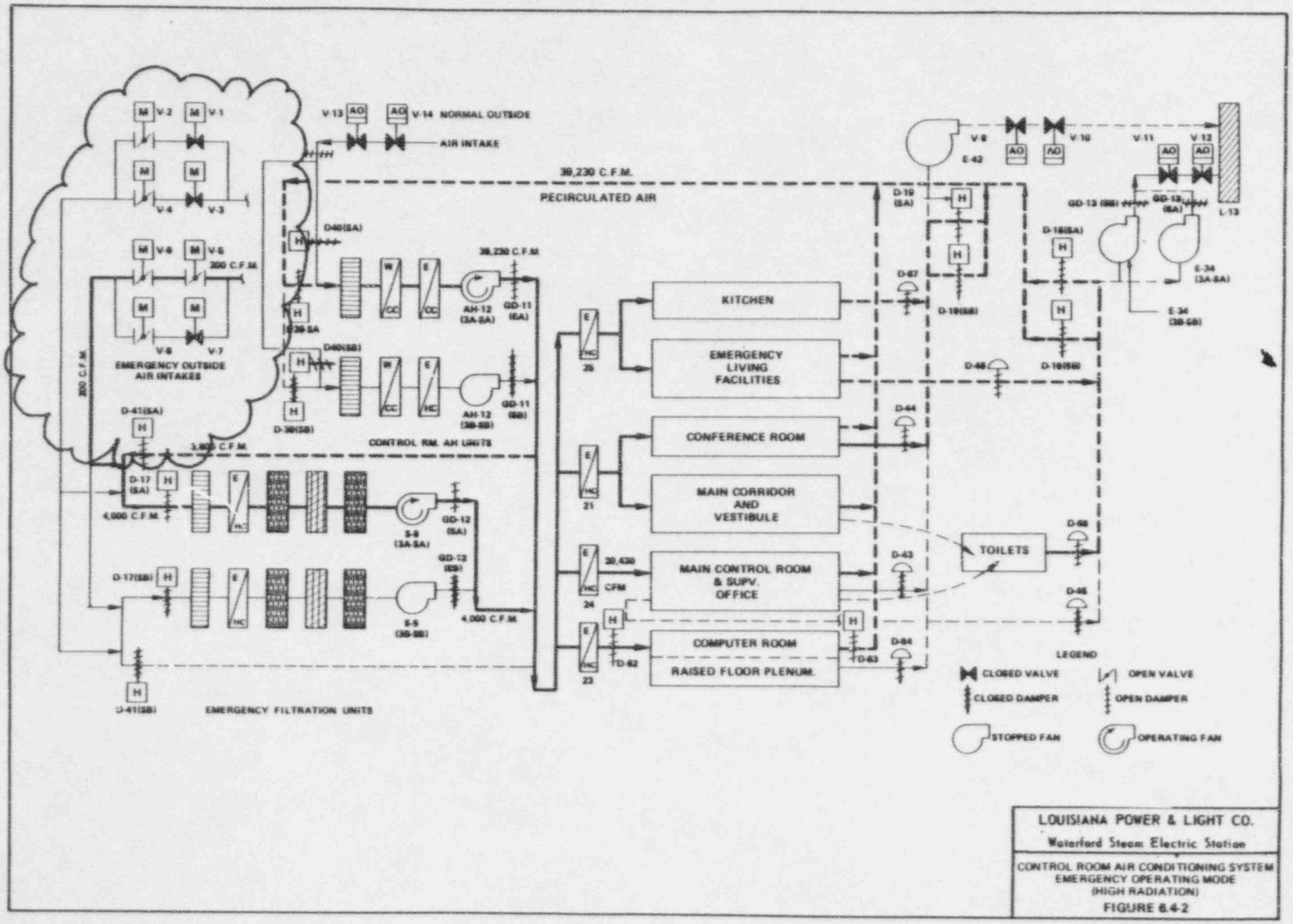
Very truly yours,

R.F. Burski
Director
Nuclear Safety

RFB/PLC/ssf
Attachment

cc: L.J. Callan, NRC Region IV
C.P. Patel, NRC-NRR
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office
Administrator Radiation Protection Division
(State of Louisiana)
American Nuclear Insurers

W3F1-95-0034
ATTACHMENT A



LOUISIANA POWER & LIGHT CO.

Waterford Steam Electric Station

CONTROL ROOM AIR CONDITIONING SYSTEM
EMERGENCY OPERATING MODE
(HIGH RADIATION)

FIGURE 6.4-2