



**LOUISIANA
POWER & LIGHT**

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July 27, 1984

W3P84-1928
3-A1.01.04
Q-3-P43

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

SUBJECT: Request for Relief from the Technical Requirements
of Appendix R, Section III.J. and Completion of
Certain Alternate Shutdown Capability Requirements

REFERENCE: (1) W3P84-1412 dated May 17, 1984

Dear Sir:

The purpose of this letter is twofold; first to request an exception from the requirement for emergency lighting as it relates to the execution of jumpering procedures for the electrical isolation of automatic diesel generator functions from the Control Room and second, to report the completion of open items noted during a recent NRC review and observation of Waterford 3's Safe Shutdown Outside the Control Room procedure.

As previously agreed, LP&L has incorporated jumpering instructions into the above mentioned alternate shutdown procedure as an interim measure until an acceptable means of electrically isolating diesel generator control functions could be effected during the first refueling outage. To provide adequate emergency lighting inside the various panels requiring a jumper, LP&L proposes to use "Streamlight" portable lights described in attachment (1). Accordingly, LP&L requests an exception from the requirements of Appendix R, Section III.J to install 8-hour battery pack lights based on the following:

1. Location of emergency lighting will change upon installation of permanent electrical isolation switches for automatic diesel generator functions.
2. Adjustable arc 20 watt lamp with an intensity of 1,400 candle-power will provide sufficient lighting for an operator to conduct jumper repairs.
3. Rechargeable power supply will illuminate the halogen lamp for approximately 2 hrs. 15 min. which is more than enough time to complete all jumper repairs.

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For the interim jumpering measures, the above factors constitute an equivalent means of meeting the requirements of Section III.J.

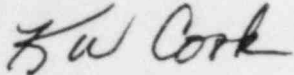
Physical work for the station modifications from reference (1) has been completed as follows:

1. JUMPER MATERIALS - All equipment necessary to effect jumper isolation of CP-1 (diesel generator control) from the Control Room have been provided at pre-designated storage locations. These materials include portable lights, hand held radios, jumper wires, tools and procedure copies.
2. REACTOR COOLANT HOTLEG PRESSURE - RCS hotleg pressure indication at LCP-43 has been rerouted electrically independent of the control room and cable vault.
3. EMERGENCY LIGHTING - As a result of our revised safe shutdown procedure outside the Control Room, 8-hour battery lights have been added to the following areas:
 - a. Emergency Diesel Generator Rooms
 - b. Atmospheric Steam Dump (ADV) local valve operating area
 - c. Emergency Feedwater local valve operating area
 - d. BMT Level local indication
4. ATMOSPHERIC STEAM DUMP VALVES - Local pneumatic control of the ADV's has been installed. Calibration and operational tests have been completed.
5. BORIC ACID M/U TANK GRAVITY FEED VALVES - Conduit for BMT gravity feed valves has been provided with a one hour wrap at E.L. -35.00.
6. SAFE SHUTDOWN COOLING ISOLATION VALVES - Breaker lockout procedures during normal operation are in effect to prevent "spurious" operations of these Hi/Lo pressure boundary valves (ISI-V1504A, ISI-V1502B).
7. SMOKE DETECTION ACCW PUMP - One additional smoke detector has been placed over each ACCW pump.
8. PRESSURIZER LEVEL INDICATION/RCB - At one location inside the reactor containment exists a covered tray containing a pressurizer level circuit which is 10 feet below its redundant pressurizer instrument cabinet. A 30 minute fire wrap has been provided for the subject cable tray out to greater than 20 feet horizontal separation from the redundant cabinet.
9. EMERGENCY FEEDWATER ISOLATION VALVES - The alternate shutdown procedure has been revised to include operator action in the event all four isolation valves of one train shut simultaneously as a result of a fire.

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We trust that the information provided by this letter is sufficient to allow completion of related fire protection safety evaluations. Should you have any further questions concerning this subject please contact our fire protection licensing engineer, Kevin Curley, at (504) 363-8950.

Yours very truly,



K. W. Cook
Nuclear Support and Licensing Manager

KWC/KNC/smb

Attachment

cc: E. L. Blake, W. M. Stevenson, D. M. Crutchfield, J. Wilson,
D. J. Kubicki, J. Weirmiel, N. Fioravante, G. L. Constable, J. Collins

NS10112SEG

DATA SHEET: Streamlight model SL-40 Lantern; The LiteBox.™

LAMPS:

- Par 36 halogen sealed beam, 50hr life.

OPTIONS	ILLUMINATION TIME	CANDLEPOWER
8W Spot	7 hr. 20 min.	25,000
8W Flood	7 hr. 20 min.	550
12W Flood	3 hr. 30 min.	850
20W Flood	2 hr. 15 min.	1,400

BATTERY:

- 6V 8 Amp maintenance free gelled lead acid battery.
- rechargeable 300x's from total discharge.
- 5-7 yr. life in stand-by applications.

LANTERN:

- Body: injection molded, high-impact ABS plastic.
- Storage compartment for DC charger.
- UL APPROVED.
- Neoprene-booted switch.
- LED indicates when charging.
- All hardware nickel-plated.
- Dimensions: 11 1/2" L x 6 15/16" W x 5 1/8" H.
- Weight: without chargers, rack
—6.1 lbs.
with chargers, rack—7.6 lbs.

WARRANTY:

Copy of limited warranty available on request.

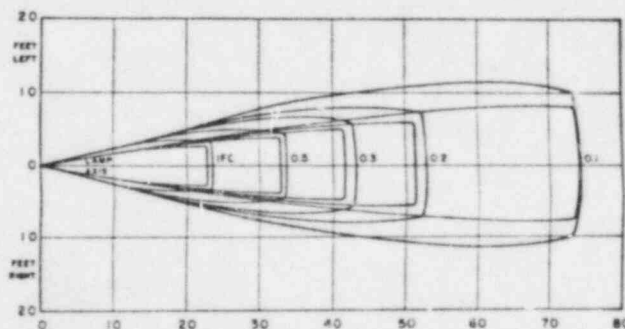
CHARGERS:

- AC or DC multiple rate charging through rack or direct to lantern. **AC charge time: 15 hrs.** DC charge time 24 hrs. DC charger uses an average of 4 amps daily.
- Dimensions—9 3/4" L x 5 1/8" W x 2 11/16" H.

OPTIONS:

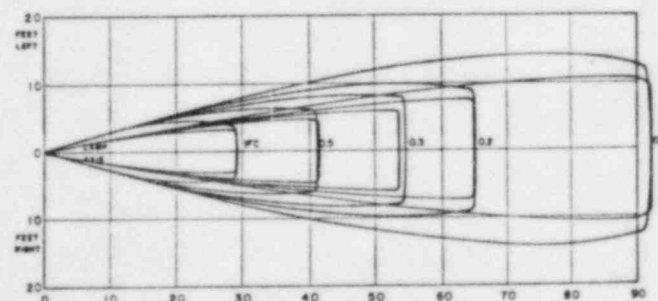
- Power failure charge rack provides automatic and instant operation of lantern when supplied power fails. Restores lantern to charge automatically.
- Carrying strap.
- Hard-wire DC charge rack for mobile installations.
- Locking charge rack.
- Swivel head extension allows 360° rotation of lamp.

FLOOD LAMP PATTERNS:



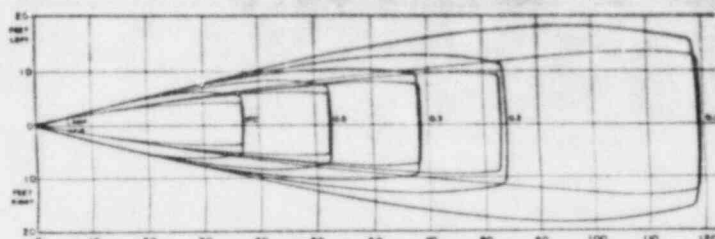
8 watt lamp

Horizontal 30° Vertical 20°
Feet from lamp (measured on axis)



12 watt lamp

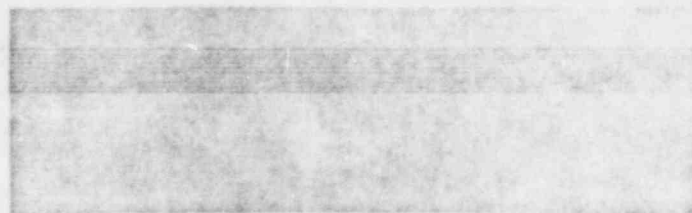
Horizontal 30° Vertical 20°
Feet from lamp (measured on axis)



20 watt lamp

Horizontal 30° Vertical 20°
Feet from lamp (measured on axis)

For more information contact your
local LiteBox™ Dealer:



or write:
Streamlight, Inc.
1030 West Germantown Pike
Norristown, PA 19403
(215) 631-0600 Telex: #846-110