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Nuclear Safety

Waterford 3

W3F1-92-0307

A4.05

QA

July 29, 1992

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  
Technical Specification Temporary Waiver of Compliance

Gentlemen:

As discussed with members of the NRC Staff, Entergy Operations, Incorporated respectfully requests a temporary waiver of compliance from the monthly Channel Functional Test required by Technical Specification 4.3.2.1 and specified by Table 4.3-2, "Engineered Safety Features Actuation System Instrumentation Surveillance Requirements," Automatic Actuation Logic. When testing Automatic Actuation Logic per TS Table 4.3-2, two types of relays are tested; initiation relays and subgroup relays. This waiver, if approved, would allow Waterford 3 to forgo the monthly test on the initiation relays. This request is essential in order to remove a significantly high potential for initiating an inadvertent safety system actuation, and in some cases a resulting reactor trip from full power.

On October 16, 1989, Waterford 3 submitted Technical Specification Change Request (TSCR) NPF-38-103. This request justified a revision of TS Table 4.3-1: Reactor Protective Instrumentation and Table 4.3-2: Engineered Safety Features Actuation System (ESFAS) based on Combustion Engineering Owners Group Topical Report CEN-327, "RPS/ESFAS Extended Test Interval Evaluation." The staff approved TSCR NPF-38-103 via Amendment No. 69 issued August 8, 1991. The staff based its approval of Amendment 69 on the NRC approved CEN-327 and additional information provided by Waterford 3 in submittal dated September 14, 1990, concerning instrument drift and setpoint values.

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On October 11, 1991, Waterford 3 submitted TSCR NPF-38-118 which was essentially a continuation of TSCR NPF-38-103. This request justified extending the surveillance (TS Table 4.3-2) frequency for ESFAS automatic actuation logic from monthly to quarterly for the initiation relays (as recommended in CEN-327) and semi-annually for the subgroup actuation relays (as recommended in CEN-403, "ESFAS Subgroup Test Interval Extension"). At the request of the Staff, TSCR NPF-38-118 was subsequently modified by Waterford 3 submittal dated December 18, 1991. The purpose of this modification was to expedite the review by separating those changes supported by CEN-327, which had received NRC approval, from those changes supported by CEN-403, which had not been approved by the Staff.

Waterford 3 has experienced problems when testing the Plant Protection System (PPS) in accordance with TS Table 4.3-2 ESFAS automated actuation logic initiation relays. These problems have resulted in two plant trips as documented in LER-91-019-00 dated September 24, 1991, and LER-91-022-00 dated December 17, 1991. On July 26, 1992, Waterford 3 experienced a Recirculation Actuation Signal (RAS) while performing surveillance testing on the ESFAS automated actuation logic initiation relays. While this event did not result in a plant trip, it did elevate the concern of continued testing and the potential for inadvertent safety system actuations.

The cause of these events is attributed to a test circuit malfunction. In accordance with Technical Specifications, a functional test of each PPS channel is performed once per month. During the circuit test sequence, a relay hold pushbutton is depressed which initiates a delayed energizing sequence. During this testing problems have centered around the delay function provided by the hold pushbutton. A Design Change (DC) 3371 was prepared and we expect this to resolve the problem. This design change will be implemented during Refuel 05 which is scheduled to begin September 19, 1992. It is important to note that analysis has confined this problem to the PPS test circuitry and not the protective features of the PPS system. Therefore, the subject relays are operable.

Waterford 3 feels that the justification for delaying the monthly surveillance for the ESFAS initiation relays outweighs continued monthly testing. This position is based on information and analysis supplied in CEN-327 (which specifically includes Waterford 3) and the circumstances surrounding this issue as described above. In addition, a review of the ESFAS initiation

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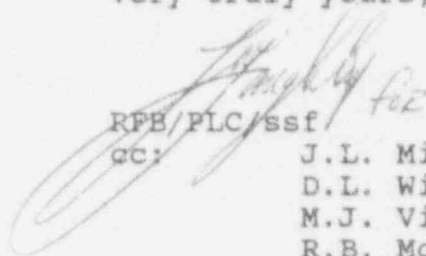
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relay's surveillance history was conducted and the results supported the conclusions made in CEN-327. Therefore, it is requested that a temporary waiver of compliance to the monthly surveillance for ESFAS initiation relays be granted until after Refuel 05, at which time planned corrective action will be complete. We would appreciate an expeditious response because the testing discussed above is due no later than August 2, 1992.

Should you have any questions, please contact P.L. Caropino at (504) 739-6692.

Very truly yours,

  
RFE/PLC/ssf

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