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November 29, 1984

Docket No. 50-382

W3P84-3323
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A4.05

Director of Nuclear Reactor Regulation
Attention: Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: WATERFORD 3 SES
COMMENTS ON DRAFT LICENSE

- References:
- 1) Letter, T.M. Novak to R.S. Leddick, dated November 27, 1984
 - 2) Letter, D.G. Eisenhower to R.S. Leddick, dated April 19, 1984
 - 3) Letter, G.W. Knighton to R.S. Leddick, dated May 30, 1984
 - 4) Letter, W3P84-1590, R.S. Leddick to D.G. Eisenhower dated June 8, 1984
 - 5) Letter W3P84-0825, L.V. Maurin to G.W. Knighton, dated April 15, 1983

The draft license No. NPF-26, transmitted by your letter of November 27, 1984, has been reviewed per your request of Reference 1. The following comments are offered.

License Condition C.1. references Attachment 1 which was not included in Reference 1. LP&L cannot, therefore, comment on the content of this Attachment.

License Condition C.2. references Appendix A - Technical Specifications and Appendix B - Environmental Protection Plan which are not included in Reference 1. However, LP&L has reviewed these documents previously as discussed below.

By letter dated April 19, 1984 the NRC Staff transmitted the "Final Draft" Waterford 3 Technical Specifications to Louisiana Power & Light Co. Subsequently, by the letter dated May 30, 1984, the NRC Staff transmitted new pages for the Waterford 3 Technical Specifications to reflect editorial and typographical changes as well as resolution of issues in the areas of reactor systems, emergency feedwater system operation and ESFAS relay testing. After completion of a thorough review/reverification program to assure the adequacy of these Technical Specifications relative to the FSAR, SER and as-built plant, LP&L certified the accuracy of the Technical Specifications by letter dated June 8, 1984. Since that time LP&L has continued to verify and validate the accuracy of the "Final Draft" Technical Specifications by performing preoperational

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surveillance testing and procedure walk throughs. The result has been that no disparities have been found which would require substantive changes to the "Final Draft" Technical Specifications.

As noted in your November 27, 1984 letter the basemat issues and the resolution of the 23 issues from the June 13, 1984 letter from D.G. Eisenhut to J.M. Cain remain to be resolved. It is LP&L's understanding through discussion with the NRC Project Manager and Branch Technical Reviewer that a requirement for a basemat monitoring and surveillance program, will be included in the Technical Specifications which will accompany the Operating License. LP&L has worked closely with the Project Manager and Branch Technical Reviewer to develop a set of technical specifications which are acceptable to both the NRC and LP&L and these efforts will continue up to the point of license issuance.

The Environmental Protection Plan was submitted to the NRC Staff on April 15, 1983 reflecting changes requested by the Staff subsequent to its review of the plan. LP&L is not aware of any revisions to the plan subsequent to the submittal via Reference 5 and assumes that the proposed Appendix B is consistent with the submittal.

License Condition C.3. references Appendix C - Antitrust Conditions which is not included in Reference 1. LP&L and the NRC Staff have previously negotiated and reached agreement on the text of this appendix and LP&L assumes the proposed Appendix C to be consistent with that agreement.

License Condition C.6.(b) requires LP&L to complete an aging analysis for non-metallic components in safety related equipment located in a harsh environment by December 31, 1984. LP&L has discussed this commitment with the NRC Project Manager and it is our understanding that the condition will be revised to require completion prior to exceeding 5% power.

License Condition C.9.d. requires that installation of battery-operated smoke detectors in the Control Room main control panels prior to initial criticality. This condition has been fulfilled and based upon discussions with the NRC Project Manager, LP&L anticipates deletion of this portion of 9.d.

License Condition C.9.e. requires LP&L to perform a spurious signal analysis for the case of a fire in any plant area (including the control room and cable vault) combined with a loss of offsite power by December 1, 1984. LP&L is currently finalizing the report documenting this analysis and anticipates its submittal on November 30, 1984. Based upon this submittal date the NRC Project Manager has indicated that this portion of the condition will be removed from the license.

License Condition C.12. requires submittal of the results of confirmatory tests of depressurization capability of the auxiliary pressurizer spray (APS) system. The testing referred to will be performed during the post-core load hot functional tests. The required date of March 1, 1985 does not provide a sufficient time frame for LP&L to assure completion of the testing, documentation of test results, comparison with analytical results and development of a schedule for

corrective actions (if required).

It is LP&L's expectation that the next supplement to the SER (SSER 8) will require the above results 6 months after license issuance. LP&L requests that the license condition be revised to be consistent with the SSER schedule.

License Condition C.15. addresses the conditions for Operating Shift Experience Requirements defined in Attachment 2. LP&L's approach has been to license on Waterford 3 sufficient personnel with the prerequisite hot operating experience to preclude the need for advisors. LP&L will assure that an experienced person or an advisor (if advisors should be utilized) will be on-shift at all times when the plant is operating above 5% power.

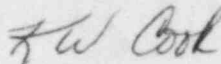
License Condition C.16. relating to modifications to meet R.G. 1.97 has been reviewed with the NRC Project Manager and, based upon the status of completion and commitments made by LP&L, it is our understanding this condition will be deleted.

LP&L has also been informed by the NRC Project Manager that an addition license condition is under consideration for inclusion under C. related to resolution of a potential issue of partial blockage of the containment sump by containment coating material. Resolution is expected to be required prior to exceeding 5% power.

License Condition E. provides a statement as to the approved security related documents whose provisions shall be implemented and maintained. Several revisions are noted for each of the approved plans. LP&L has issued complete revisions for each of the documents such that the latest revision stand alone and reference need not be made to earlier revisions. Only the following revisions will be available for use at Waterford 3.

Site Security Plan - Revision 8
Safeguards Contingency Plan - Revision 3
Guard Training and Qualification Plan - Revision 2

Very Truly yours,



K.W. Cook
Nuclear Support & Licensing Manager

KWC:sms

cc: G.W. Knighton, NRC-NRR
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