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 September 30, 1988

 W3P88-1817
 A4.05
 QA

Mr. Robert D. Martin
 Regional Administrator, Region IV
 U.S. Nuclear Regulatory Commission
 611 Ryan Plaza Drive, Suite 1000
 Arlington, TX 76011

SUBJECT: Waterford 3 SES
 Docket No. 50-382
 License No. NPP-38
Request For Enforcement Discretion

Dear Mr. Martin:

This letter will serve to document LP&L's request for enforcement discretion in the implementation of Technical Specification 3.3.1, Reactor Protective Instrumentation.

On the evening of September 29, 1988, Waterford 3 Duty Plant Manager, John McGaha, reviewed with your Messrs. Callan and Chamberlain, our discovery of missing seismic restraints in the core protection calculator (CPC) cabinets.

Condition Identification (CI)-256700 was generated on June 15, 1988 to document a missing seismic restraint in the rear of the fixed incore amplifier (FICA) drawers located in the upper portion of Bays A, B, C, and D of the CPCs. The CI resulted from a routine review to update design documents following a design change to the FICA drawers during the second refueling outage. The engineer responsible for the update noted that Drawing 1564-5422 had not yet incorporated an old field change request (FCR-2759 Revision 1), unrelated to the outage design change, which would have installed the missing seismic restraints. A walkdown was conducted to verify installation and it was found that the rear FICA drawer seismic restraints had not been installed. As a result, CI-256700 was generated to identify the problem, however no action was taken on the CI at that time.

Recently, Waterford 3 has been conducting a review of outstanding Non-Conformance CIs. During the review, on September 29, 1988, CI-256700 was identified as having a potential impact on plant operations, and brought to the attention of Waterford 3 management.

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Management immediately assessed the impact of the missing seismic restraints on the safe operation of the plant and the Technical Specifications. Technical Specification 3.3.1, Reactor Protective Instrumentation, requires in Table 3.3-1 that a minimum of three CPC channels be operable. An engineering evaluation of the missing CPC cabinet seismic restraints determined that each of the four CPC channels may become inoperable as the result of a seismic event. Consequently, at 6:20 p.m. on September 29, 1988, the CPCs were declared inoperable. Because the Action Statements of Technical Specification 3.3.1 are silent when fewer than two CPC channels are inoperable, Technical Specification 3.0.3 was entered.

As discussed by Mr. McGaha, replacement of the missing seismic restraints was imminent. Appropriate material had been located, leaving only minor machining and installation in order to return the CPC cabinets to a seismically qualified status. We estimated that approximately 6-12 hours would be necessary to complete installation of the restraints.

Enforcement discretion in applying Technical Specification 3.3.1 was requested because the short period of time to restore the CPC cabinets to a qualified state approximated that necessary to shut down Waterford 3.

To support enforcement discretion we noted that the probability of an operating basis earthquake (OBE) was approximately 7×10^{-8} per hour, or approximately 2×10^{-6} in a 24 hour period (FSAR Section 2.5.2.7 calculates an OBE probability of 2.6% during a 40 year plant lifetime). To further reduce the already low probability of a seismic event adversely affecting the CPCs, plant operators were instructed to manually scram the reactor upon receipt of a seismic alarm or other indication of a seismic event in progress, until the CPC cabinets had been restored to a seismically qualified condition. Finally, it should be noted that the CPC design and four channel configuration provide a very high level of confidence that a CPC failure induced by a seismic event would be in the fail-safe (i.e. tripped) direction.

Based upon our discussions, Waterford 3 was verbally granted enforcement discretion from the Limiting Condition For Operation of Technical Specification 3.3.1, for 24 hours. The missing CPC cabinet seismic restraints have since been replaced. Restraints were installed in 3 cabinets by 6:30 a.m. on September 30. Due to minor problems, the remaining restraint was installed by 10:30 a.m.

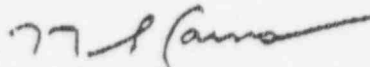
An investigation to determine the cause of the missing seismic restraints is underway and will be completed by October 3. The review of open non-conformance CIs, which led to discovery of the missing seismic restraints has been divided into two phases - the review of safety-related non-conformance CIs which could potentially involve common mode failures or potentially lead to application of Technical Specification 3.0.3 will be completed by October 1, 1988; the remaining safety-related

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non-conformance CIs will be reviewed, and necessary corrective action identified and scheduled by October 7, 1988. To ensure that non-conformance items that could impact safe operation of Waterford 3 are properly addressed in a timely manner in the future, all such items will receive a prompt evaluation and management review, and will be tracked in the plan of the day meeting.

We wish to thank you and your Staff for your prompt and professional assistance in this matter. Please let me know if we may provide you with additional information.

Very truly yours,



N.S. Carne
Plant Manager - Nuclear

MJM/NSC/mtm

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