

**LOUISIANA
POWER & LIGHT**

142 DELARONDE STREET
P. O. BOX 6008 • NEW ORLEANS, LOUISIANA 70174 • (504) 366-2345

May 14, 1985

ROTH S. LEDDICK
Senior Vice President
Nuclear Operations
W3P85-1289
A4.05

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

SUBJECT: Waterford SES Unit 3
Docket No. 50-382
License No. NPF-38
Technical Specification Change Request

Dear Sir:

Louisiana Power & Light hereby files an application for an amendment to the Waterford 3 operating license pursuant to 10 CFR 50.90. The enclosed proposed changes do not involve an unreviewed safety question nor a significant hazards consideration.

These changes, as discussed with your Staff in a meeting on May 9, 1985, are requested in order to provide additional means of secondary chemistry control. Absent the changes, Waterford 3 may be required to shut down to maintain secondary chemistry within specifications. Therefore, it is requested that the changes to the Waterford 3 Technical Specifications, as described herein, be granted on an emergency basis in accordance with 10 CFR 50.91.

Your prompt attention to this request is appreciated.

Yours very truly,

R.S. Leddick
Senior Vice President
Nuclear Operations

RSL/MJM/sms

Enclosure

cc: E.L. Blake, W.M. Stevenson, J.H. Wilson, R.D. Martin, State of
Louisiana, G.L. Constable

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

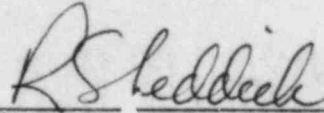
In the matter of

Louisiana Power & Light Company
Waterford 3 Steam Electric Station

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) Docket No. 50-382
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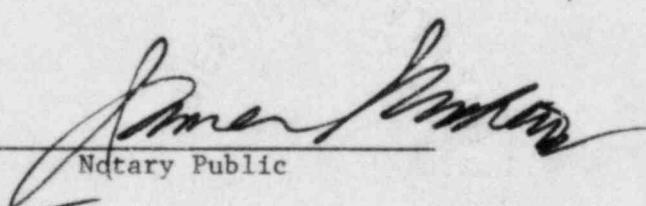
R. S. Leddick, being duly sworn, hereby deposes and says that he is Senior Vice President - Nuclear Operations of Louisiana Power & Light Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.



R. S. Leddick
Senior Vice President
Nuclear Operations

STATE OF LOUISIANA)
) ss
PARISH OF ST. CHARLES)

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 14th day of May, 1985.



Notary Public

My Commission expires

27 April

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-01

This is a request to revise Technical Specification Table 3.3-12 "Radioactive Liquid Effluent Monitoring Instrumentation", Table 4.3-8 "Radioactive Liquid Effluent Monitoring Instrumentation Surveillance Requirements", and Table 4.11-1 "Radioactive Liquid Waste Sampling and Analysis Program" for Waterford SES Unit 3.

Existing Specifications:

See Attachment A

Proposed Specifications:

See Attachment B

Description:

The changes to Technical Specification Tables 3.3-12 and 4.3-8 are being made to provide for automatic termination of steam generator blowdown discharge through the Circulating Water System (CWS) and to add a continuous sampler in the steam generator blowdown effluent line. The change to Technical Specification Table 4.11-1 is being made to define the sampling and analysis program for steam generator blowdown discharges through the CWS or to the Waterford 3 waste pond.

Specifically, in Tables 3.3-12 and 4.3-8 the status of the existing CWS radiation monitor is changed from an alarming function to an alarming and termination function for the new steam generator blowdown discharge line to the CWS. A continuous sampler is added to both tables. This sampler will be used whenever the CWS or waste pond pathways for steam generator blowdown are in use.

The steam generator blowdown discharge pathways to the CWS and waste pond are added to Table 4.11-1 and provided with continuous sampling in accordance with the Standard Technical Specifications. An additional Table 4.11-1 notation (note j) is added to clarify when sampling and analysis is required as well as defining the conditions under which blowdown may be discharged to the waste pond.

Safety Analysis

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

Response: NO

The most limiting accident from the point of view of off-site dose consequence is the SGTR event analyzed in Chapter 15 of the FSAR. In that event, the off-site dose due to the release of steam from the secondary side safeties is greater than 2 orders of magnitude less than the 10CFR100 requirements. The effects on the total off-site dose calculated for this event due to superimposing either a concurrent discharge to the Circulating Water System (CWS) or the Waterford 3 waste pond are minimal. For the CWS and waste pond pathways the most adverse consequences are due to the thyroid dose attributable to inhalation. For both pathways the thyroid dose is a small fraction (one to two orders of magnitude less) of the steam release dose. The additional dose due to the CWS or waste pond pathway thus provides negligible impact on the SGTR event when compared with 10CFR100 requirements. As a result, operation of the facility in accordance with the proposed Technical Specification changes will not involve a significant increase in the consequences of any accident previously evaluated.

The Technical Specification changes are being proposed to provide further means to maintain secondary water chemistry within approved specifications. One purpose for maintaining limits on secondary water chemistry is to preserve to the extent possible the integrity of the steam generator tubes. Therefore the proposed Technical Specification changes will not involve a significant increase in the probability of any accident previously evaluated; rather the proposed changes will assist in maintaining the already low probability of a SGTR event.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: NO

The Steam Generator Blowdown discharge to either the Circulating Water System (CWS) or the waste pond was analyzed in the context of the limiting SGTR event previously analyzed in the FSAR. It was determined that superimposing the additional pathways onto the SGTR event produced a negligible increase in the total off-site dose consequence when compared with 10CFR100 limits. The liquid effluent pathways discussed in Table 4.11-1 are similar to the proposed Steam Generator Blowdown discharge pathways. The existing Table 4.11-1 pathways have been identified in the FSAR and reviewed and approved for inclusion in the Waterford 3 Technical Specifications. Based upon the above, operation of Waterford 3 in accordance with the proposed changes will not create the possibility of a new or different kind of accident from any previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: NO

The SGTR event in combination with Steam Generator Blowdown directed to either the CWS or waste pond result in off-site dose consequences of a small fraction (less than 1%) of the 10CFR100 limits. Inclusion of the Steam Generator Blowdown discharge in Table 4.11-1 requires that concentrations at the point of release to the unrestricted area be maintained within the limits of 10CFR20, Appendix B, Table II, Column 2. Therefore, operation at Waterford 3 in accordance with the proposed changes will not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (vi) related to a change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the changes are clearly within all acceptance criteria with respect to the system or component specified in the Standard Review Plan (SRP).

In the case of the preferred steam generator blowdown path to the CWS the SRP (in Section 11.3) suggests monitoring and isolation capability exist on the discharge line as well as provisions for continuous sampling. The proposed changes are presented in order to provide for such capability in the Technical Specifications. For both the steam generator blowdown paths to the CWS and waste pond, the off-site dose consequences due to the combined steam and liquid releases during a SGTR event are well below the acceptance criteria of 10CFR100. The automatic termination capability for the CWS discharge, and administrative controls on the waste pond discharge ensure that 10CFR20 criteria are met. Therefore, the proposed changes meet the acceptance criteria in the SRP and 10CFR and are similar to example (vi).

Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10CFR50.91; and (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.