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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
Preliminary Action Plan for Air-Operated
Isolation Valves

Gentlemen:

On October 25, 1996, a conference call was held between Waterford 3 Management personnel and the NRC to discuss the results of the Special Inspection on containment penetrations for the Containment Spray (CS) System and Component Cooling Water (CCW) to the Containment Fan Coolers (CFCs) (10 penetrations total). Based on this call, an agreement was reached to submit this letter to the NRC. The purpose of this letter is to: 1) Summarize current licensing position, 2) Provide conservative interim measures with respect to isolation of the subject penetrations, 3) Document testing results to date, and 4) Outline actions being taken to obtain and review all design basis information in support of a submittal to the NRC by November 8, 1996.

Waterford 3 has provided the position that the subject penetrations do meet the General Design Criteria and that past correspondence indicates approval of the current design. Important points are:

- In a letter to the NRC on Appendix J Leakrate Testing and Containment Isolation Valves dated March 16, 1984, Waterford 3 informed the NRC that the Containment Spray System is normally water filled and in operation under post accident conditions. The letter also indicated that CS-125 was located at the system low point and water is maintained around the valve even if the CS pump

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fails to start. Because this system is maintained water filled, that portion of the system outside containment is considered closed.

- In 1993 the NRC staff approved a temporary TS change to maintain CS-125 in the open position. The associated SER for this change acknowledges that CS-125A(B) is a remote manual valve that cannot be closed when a CSAS is in effect and that the design configuration and classification is consistent with the SRP containment penetration isolation criteria. The staff also indicated that should an event occur requiring containment isolation but not requiring containment spray, then check valves CS-128A(B) would provide one isolation barrier and the CS system piping water seal would provide a second barrier.

- In NRC Inspection Report 96-09, NRC inspectors noted that since some containment isolation valves do not have a designated closed safety function, ASME Code Section XI inservice test requirements do not require these valves to be tested. Based on the inspectors' review of meeting minutes, commitment letters, the UFSAR, and the Technical Specifications, the practice of not testing the subject valves for the purpose of containment isolation was determined to be in accordance with the designed licensing bases of the plant.

Although Waterford 3 believes the design of the subject penetrations meets regulatory requirements, conservative actions are being taken to further ensure the ability to isolate these penetrations if required. The following is a list of actions currently being taken to further ensure the safety function is being maintained:

- Waterford 3 is in the process of providing guidance for actions to close these containment isolation valves (i.e., overriding of ESFAS actuating signals) if deemed necessary post accident should multiple failures occur. This guidance is expected to be in place by November 1, 1996. Should this date not be met, Waterford 3 will inform the NRC.

- Testing of the accumulators for six of the ten valves in question has been performed. The testing results are as follows:
  - ⇒ Change 1 to Revision 2 of STA-001-005, "Leakage Testing of Air and Nitrogen Accumulators for Safety Related Valves," incorporated testing of CS-125A(B) accumulators based on maintaining the valves closed for six hours. Both valves were tested with acceptable results (acceptance criteria is $\leq$ 2.4 psid/hour):
    - CS-125A: 1.59 psid/hour
    - CS-125B: 0.81 psid/hour

⇒ Change 2 to Revision 2 of STA-001-005 incorporated testing of the accumulators for CCW to the Containment Fan Coolers based on maintaining the valves closed for ten hours. It should be noted that satisfactory testing of one CFC in each train of Containment Cooling has been completed. This is the minimum number of CFC's required by TS. The following test results have been obtained (acceptance criteria is $\leq$ 2.26 psid/hour):

Containment Fan Cooler A
- CC-808A: 0.64 psid/hour
- CC-822A: 1.20 psid/hour

Containment Fan Cooler D
- CC-808B: 1.19 psid/hour
- CC-822B: 1.91 psid/hour

⇒ Efforts to test the accumulators associated with Containment Fan Coolers B and C are in progress. This testing is expected to be completed by November 1, 1996. Should this date not be met, Waterford 3 will inform the NRC.

The following is a list of actions currently being taken to review the original design basis of the subject containment penetrations:

- Waterford 3 is currently in communication with the architect engineer, Raytheon, to obtain further insight on the original design and acceptance of the subject penetrations. This review may provide a better understanding of the description of these penetrations in the FSAR.
- Based on the above review it will be determined if all design basis requirements are being met.
- Waterford 3 will submit a letter to tne NRC by November 8, 1996 to provide the results of this review.

Waterford 3 is confident that the containment isolation safety function is being met with regard to the subject penetrations and is further investigating the original design basis. Waterford 3 will also evaluate other containment penetrations which are supplied with air-operated isolation valves to determine if similar actions are necessary.

Should you have any questions or require additional information, please contact me at (504) 739-6242 or Tim Gaudet at (504) 739-6666.

Very truly yours,

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