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Waterford 3

W3F1-97-0155
A4.05
PR

June 16, 1997

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
Inservice Inspection (ISI) First Interval Extension

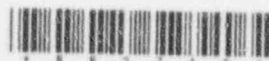
Gentlemen:

In a letter dated April 14, 1994, Entergy requested an extension of the 120 month Inservice Inspection (ISI) and Inservice Testing (IST) period for ANO Unit 1, Grand Gulf and Waterford 3 while the NRC was considering proposed alternatives to 10CFR50.55a(f) and (g) submitted by Entergy on October 21, 1993. This request was made under 10CFR50.55a(a)3 which allows NRC to authorize alternatives to selected requirements contained in 10CFR50.55a.

The intent of the extension was to extend the current interval to include an additional refueling outage. The requested extension for Waterford 3 was to July 1, 1997. This date, as established in 1994, was based on the assumption that Refueling Outage 8 (RF 8) would begin in March 1997 with a 40 day duration. The first interval end date was an arbitrary date chosen by the licensee to occur after the completion of RF 8.

On August 2, 1994, the NRC issued a Safety Evaluation authorizing the extension of the current 120 month interval for a period to include one additional refueling outage beyond the current interval end date. The approval was for an interim period, including the additional refueling outage, up to the date established by each Plant and specified in the Safety Evaluation. A decrease in a subsequent interval would be made to adjust for the period beyond 1 year authorized by this safety evaluation.

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Based on this extension, Waterford 3 planned to perform all outage related system pressure tests and repair/replacement activities in accordance with ASME Boiler and Pressure Vessel Code, Section XI, 1980 Edition with addenda through Winter 1981 and associated relief requests. All plant procedures required to perform these RF 8 tests were written to the 1980/81 Code. The system pressure tests were scheduled to be performed during plant startup at the end of the outage where the necessary plant and system conditions could be achieved.

RF 8 at Waterford 3 began on April 11, 1997. On May 28, 1997, a fault occurred in a start-up transformer. It was subsequently determined that the transformer could not be repaired in place. The transformer has been sent to an offsite facility for repair. In conjunction with the repair effort, a replacement transformer has been located and testing of this transformer is in progress.

As a result of this transformer failure, Waterford 3 may not complete those tests scheduled during RF 8 plant startup prior to July 1, 1997, the extended interval end date. These tests require the applicable systems be at nominal operating pressure. The plant must be in mode 3 to satisfy these conditions. This is not expected to occur before July 1, 1997. Therefore, the scheduled tests cannot be performed before the end of the interval.

A portion of the remaining RF 8 tests are performed to satisfy first interval requirements. Tables IWB-2500-1, IWC-2500-1 and IWD-2500-1 in the 80/81 Code require a hydrostatic test be performed on all Class 1, 2 or 3 pressure retaining components at or near the end of the interval. Waterford 3 was granted relief from this requirement in accordance with Code Case 498-1 in a Safety Evaluation dated March 29, 1995. This Safety evaluation allows a nominal operating pressure test versus a hydrostatic test but will expire at the end of the first interval. Therefore any testing performed after July 1 would require a hydrostatic test.

The remainder of the RF 8 tests involve repair/replacement activities. The 80/81 Code requires a hydrostatic test be performed following all class 1, 2 and 3 repair/replacement activities. Waterford 3 was granted relief from this requirement in accordance with Code Case 416-1 in a Safety Evaluation dated March 29, 1995. This Safety Evaluation allows a nominal operating pressure test versus a hydrostatic test following a repair/replacement but will expire at the end of the first interval. Therefore any testing performed after July 1 would require a hydrostatic test.

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Plant procedures to perform the above testing during RF 8 startup would have to be revised to use hydrostatic testing in lieu of pressure testing. To perform hydrostatic testing, it would as a minimum be necessary to install hydro test equipment, design and erect temporary supports for steam lines to be hydro tested, place systems in abnormal lineups and gag or remove relief valves. This would present an extreme hardship on the plant without a compensating increase in the level of quality and safety.

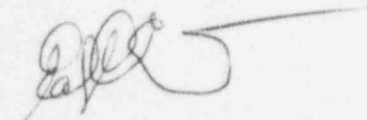
In the August 2, 1994, Safety Evaluation approving the interval extension, it was stated that allowing up to an additional year beyond that allowed by the Code for extension of the current intervals will not adversely affect the level of quality and safety provided by the ISI and IST programs. This would effectively allow an interval extension for Waterford 3 to September 24, 1997; two years from the original interval end date. Given this and the fact that the requested interval end date was always intended to be after the completion of RF 8, Waterford 3 requests approval pursuant to 10CFR50.55a(a)(3)(ii) to extend our present interval to coincide with the end of RF 8.

The start date of the second 10 year interval as currently specified in the Safety Evaluation is July 1, 1997. That date will not change as a result of this request; rather, it would overlap with the end of the first interval. All pressure tests associated with and performed during RF 8 will be credited only to the first interval.

This request has been discussed with the Waterford 3, NRR Project Manager. Given the current interval end date, Waterford 3 respectfully requests your approval by June 30, 1997.

Should there be any questions, please contact Kevin Hall at (504) 739-6423 or me at (504) 739-6242.

Very truly yours,



E. C. Ewing

Director

Nuclear Safety & Regulatory Affairs

ECE/DMU/tjs

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cc: E.W. Merschoff, NRC Region IV
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NRC Resident Inspectors Office
Administrator - LRPD