



Entergy Operations, Inc.
P.O. Box B
Killona, LA 70066
Tel 504 739 6242

Early C. Ewing, III
Director
Nuclear Safety & Regulatory Affairs
Waterford 3

W3F1-97-0117
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PR

May 20, 1997

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 CES
Docket No. 50-382
License No. NPF-38
10 CFR 50 Appendix R Exemption Request Clarification

Gentlemen:

During the April 21 through April 25, 1997 Inspection (IR 97-08) of Waterford 3's Reactor Coolant Pump (RCP) Lube Oil Collection System, the NRC inspector identified apparent inconsistencies between information submitted in our February 19, 1997 Appendix R exemption request (W3F1-97-0021) and actual measures in the field. The following clarifications and improvements are provided in that regard.

In brief summary, Waterford 3 submitted the above mentioned exemption request to address compliance with Appendix R, Section III.O requirements. The Appendix includes a requirement to have an oil collection system for leakage points, including RCP oil fill lines. Waterford 3's exemption request was submitted to address a variance with this requirement. Although the RCP oil fill lines are included in the RCP Oil Collection System, a design modification which later added remote fill lines did not incorporate the extended lines in the oil collection system. The exemption request discussed why the system (as installed) adequately meets the intent, although not the letter, of the Appendix R requirement. The February 19, 1997 submittal described that the remote fill line tubing is normally empty; is seismically supported; was functionally tested after installation; and that any overflow at the entry point into the original fill system would go into the existing RCP oil collection system. In addition a statement was included addressing administrative controls in place associated with adding oil to the RCPs.

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Questions raised during the inspection were centered around the administrative controls. Of the administrative controls listed in the Appendix R exemption request, the Inspector verified provisions for the following:

- conduct of oil addition under a repetitive task work authorization (WA),
- control of combustibles under procedure (FP-001-017), and
- draining of any excess oil leakage from the RCP Oil Collection System storage tanks upon completion of the oil addition task.

Clarification was requested concerning the remaining administrative controls listed below:

- Tank level monitoring allows for immediate determination if leakage has or is occurring.
- During communications between the technician in the field and the control room, it is verified that a level increase change occurs in the reservoir.

The term "tank" mentioned above is referring to the RCP lube oil reservoir tanks. An empirically established relationship, translating gallons added to percent increase in tank level will be applied to monitor the rise in level in the tanks associated with oil addition. This will allow for a comparison of oil volume added to that actually entering the reservoir tanks. This method had been established for the upper reservoir (prior to the inspection), but had not been officially documented. The method was empirically generated for the lower RCP reservoir during Refuel 8. Previously, the lower reservoir was monitored for level increase during oil addition, but there was no precise correlation to volume change. The relationship of oil added to percent increase in the reservoir tanks has been incorporated in the RCP vendor Technical Manual. Per the repetitive task, the technicians adding oil will verify the level increase in the RCP reservoir either by use of the Plant Monitoring Computer or by communicating with the Control Room Operator. This will be done after exiting Containment in the interest of ALARA (at power).

Provisions are provided in the repetitive task to have the Technician observe for oil on the floor under the applicable RCP prior to adding oil and to observe for oil under

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the RCP on the way out of Containment (for comparison). The expectation being to identify gross oil leakage past the oil collection system if it were to occur.

The running level in the RCP reservoirs is being monitored and trended on a regular basis. These trends can be used to identify changes in reservoir levels, which may be indicative of leakage.

Waterford 3 operated throughout cycle 8 without having to add oil at power.

There was no intention to mislead the NRC with the level of detail provided in the exemption request. If we can provide additional information, please contact me at (504) 739-6242 or Oscar Pipkins at (504) 739-6707.

Very truly yours,



E.C. Ewing
Director
Nuclear Safety & Regulatory Affairs

ECE/OPP/tmm

cc: E.W. Merschoff, NRC Region IV
C.P. Patel, NRC-NRR
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office