



Entergy Operations, Inc.  
17265 River Road  
Killona, LA 70066  
Tel 504 739 6660  
Fax 504 739 6678

Charles M. Dugger  
Vice President, Operations  
Waterford 3

W3F1-2000-0028  
A4.05  
PR

March 29, 2000

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  
Request for Miscellaneous Minor Changes to Previously  
Submitted Technical Specification Change Requests

Gentlemen:

The purpose of this letter is to request the NRC Staff to review and approve the following minor changes that affect the Administrative Controls Section of the Waterford 3 Technical Specifications. These minor changes are as follows: 1) changes in the wording implementing the Technical Specification Bases Control Program, 2) approve a change that is editorial in nature in the Administrative Controls Section addressing the Quality Assurance Program, 3) add a header to the Administrative Controls Section page 6-25, and 4) request the pages implementing the Configuration Management Program (CRMP) in submittals presently with the NRC Staff not be issued.

Entergy is requesting the review and approval of the enclosed revision to Technical Specification Change Request (TSCR) NPF-38-216. The TSCR was originally submitted via Letter W3F1-99-0111 dated July 15, 1999. It requested the approval of the Technical Specification Bases Control Program and the correction of an editorial error that was noted following the issuance of Amendment 146, dated October 19, 1998.

As discussed with the NRC Staff, the reference to "an unreviewed safety question" has been replaced with the agreed upon wording. Also, the previously requested

A001

Request for Miscellaneous Minor Changes to Previously  
Submitted Technical Specification Change Requests  
W3F1-2000-0028

Page 2

March 29, 2000

TSCR wording for Section 6.17.d has been replaced with the improved Standard Technical Specifications wording.

It is requested the editorial change previously described in TSCR NPF-38-216 be reviewed and approved. In the request, TSCR NPF-38-215 via Letter W3F1-99-0007, to implement changes to the TSs allowing the relocation of the administrative controls related to Quality Assurance, Entergy did not change the specific steps' wording which should have directed individuals to the Quality Assurance Program Manual versus steps in the Waterford 3 TSs. The previous information provided by TSCR NPF-38-215 encompasses this change request to support the correction to the editorial error.

Two additional changes are requested to be reviewed and approved by the NRC Staff. The first is the addition of the Administrative Controls Section header to page 6-25 of Waterford 3's TS. The second is the Technical Specifications Bases Control Program's Section number is changed to 6.16 versus 6.17 as originally requested in the initial TSCR. Section 6.16 had been reserved for the CRMP. The NRC Staff informed Entergy the addition of the CRMP to the TS would no longer be required; therefore, the section number will not need to be reserved. Entergy is requesting the NRC Staff to not issue the Administrative Control pages associated with the CRMP upon the approval of the following submitted TSCRs: 1) TSCR NPF-38-220 via Letter W3F1-99-0022, 2) TSCR NPF-38-221 via Letter W3F1-99-0025, 3) NPF-38-222 via W3F1-99-0023, and 4) TSCR NPF-38-223 via Letter W3F1-99-0024.

Attachment B contains the proposed marked-up specifications and Attachment C contains the proposed specifications. These attachments replace those attachments included in TSCR NPF-38-216 in entirety.

The information provided in this correspondence does not change the original submittals' (TSCRs NPF-38-215 and NPF-38-216) No Significant Hazards Consideration (NSHC) Determinations; therefore, the original NSHC Determinations remain valid.

Request for Miscellaneous Minor Changes to Previously  
Submitted Technical Specification Change Requests  
W3F1-2000-0028

Page 3

March 29, 2000

This letter and its contents contain no new commitments.

Should you have any questions or comments concerning this request, please contact  
Arthur E. Wemett at (504) 739-6692.

Pursuant to 28 U.S.C.A. Section 1746, I declare under penalty of perjury that the  
foregoing is true and correct. Executed on March 29, 2000.



C.M. Dugger  
Vice President, Operations  
Waterford 3

CMD/AEW/rtk

Attachments: Attachment B  
Attachment C  
NPF-38-216

cc: E.W. Merschoff, NRC Region IV  
N. Kalyanam, NRC-NRR  
J. Smith  
N.S. Reynolds  
NRC Resident Inspectors Office  
Louisiana DEQ/Surveillance Division  
American Nuclear Insurers

NPF-38-216 Minor Change

**ATTACHMENT B**

PROPOSED MARKED-UP SPECIFICATIONS

INDEX

ADMINISTRATIVE CONTROLS

---

<u>SECTION</u>	<u>PAGE</u>
6.11 RADIATION PROTECTION PROGRAM.....	6-22
6.12 HIGH RADIATION AREA.....	6-22
6.13 PROCESS CONTROL PROGRAM.....	6-23
6.14 OFFSITE DOSE CALCULATION MANUAL.....	6-24
6.15 CONTAINMENT LEAKAGE RATE TESTING PROGRAM.....	6-24

6.16 TECHNICAL SPECIFICATIONS BASES CONTROL PROGRAM ..... 6-26

## ADMINISTRATIVE CONTROLS

### HIGH RADIATION AREA (Continued)

- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Radiation Protection Superintendent-Nuclear in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose greater than 1000 mrem\* but less than 500 rads\*\* shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Superintendent on duty and/or health physics supervision/designee. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose in excess of 1000 mrem\* but less than 500 rads\*\* that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, direct or remote (such as use of closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

### 6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

6.13.2 Licensee-initiated changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by ~~Specification 6.10.3p~~. This documentation shall contain:
  - 1. Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s) and

\*Measurement made at 30 centimeters from the radiation source or from any surface that the radiation penetrates.

\*\*Measurement made at 1 meter from the radiation source or from any surface that the radiation penetrates.

*The Quality Assurance Program Manual*

## ADMINISTRATIVE CONTROLS

### PROCESS CONTROL PROGRAM (Continued)

2. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

b. Shall become effective after the approval of the General Manager Plant Operations.

#### 6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 The ODCM shall be approved by the Commission prior to implementation.

6.14.2 Licensee-initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained as required by ~~Specification 6.10.3p~~. This document shall contain:

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

2. A determination that the change will maintain the level of radioactive effluent control required pursuant to 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose or setpoint calculations.

b. Shall become effective after the approval of the General Manager Plant Operations.

c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

#### 6.15 CONTAINMENT LEAKAGE RATE TESTING PROGRAM

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is 44 psig.

The maximum allowable containment leakage rate,  $L_a$ , is 0.5% of containment air weight per day at  $P_a$ .

*The Quality Assurance Program Manual*

## ADMINISTRATIVE CONTROLS

### CONTAINMENT LEAKAGE RATE TESTING PROGRAM (Continued)

Leakage rate acceptance criteria are:

- a. Overall containment leakage rate acceptance criteria is  $\leq 1.0 L_a$ . During the first unit startup following each test performed in accordance with this program, the overall containment leakage rate acceptance criteria are  $\leq 0.60 L_a$  for the Type B and Type C tests and  $\leq 0.75 L_a$  for Type A tests.
- b. Air lock acceptance criteria are:
  1. Overall air lock leakage rate is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ .
  2. Leakage rate for each door seal is  $\leq 0.005 L_a$  when pressurized to  $\geq 10$  psig.
- c. Secondary containment bypass leakage rate acceptance criteria is  $\leq 0.06 L_a$  when tested at  $\geq P_a$ .
- d. Containment purge valves with resilient seals acceptance criteria is  $\leq 0.06 L_a$  when tested at  $\geq P_a$ .

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

INSERT 1  
ON NEXT PAGE (6-26)

**INSERT 1**  
**ON NEXT PAGE (6-26)**

**6.16 TECHNICAL SPECIFICATIONS BASES CONTROL PROGRAM**

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the Technical Specifications shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following:
  1. A change in the Technical Specifications incorporated in the license; or
  2. A change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of Specification 6.16.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e) and exemptions thereto.

NPF-38-216 Minor Change

**ATTACHMENT C**

PROPOSED SPECIFICATION

INDEX

ADMINISTRATIVE CONTROLS

---

<u>SECTION</u>	<u>PAGE</u>
<u>6.11 RADIATION PROTECTION PROGRAM.....</u>	6-22
<u>6.12 HIGH RADIATION AREA.....</u>	6-22
<u>6.13 PROCESS CONTROL PROGRAM.....</u>	6-23
<u>6.14 OFFSITE DOSE CALCULATION MANUAL.....</u>	6-24
<u>6.15 CONTAINMENT LEAKAGE RATE TESTING PROGRAM.....</u>	6-24
<u>6.16 TECHNICAL SPECIFICATIONS BASES CONTROL PROGRAM.....</u>	6-26

## ADMINISTRATIVE CONTROLS

---

### HIGH RADIATION AREA (Continued)

- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Radiation Protection Superintendent-Nuclear in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose greater than 1000 mrems\* but less than 500 rads\*\* shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Superintendent on duty and/or health physics supervision/designee. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose in excess of 1000 mrems\* but less than 500 rads\*\* that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, direct or remote (such as use of closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

### 6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

6.13.2 Licensee-initiated changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained by the Quality Assurance Program Manual. This documentation shall contain:

\*Measurement made at 30 centimeters from the radiation source or from any surface that the radiation penetrates.

\*\*Measurement made at 1 meter from the radiation source or from any surface that the radiation penetrates.

## ADMINISTRATIVE CONTROLS

---

### PROCESS CONTROL PROGRAM (Continued)

1. Sufficient information to support the change together with the appropriate analyses or evaluation justifying the change(s) and
  2. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the PORC and the approval of the General Manager Plant Operations.

### 6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 The ODCM shall be approved by the Commission prior to implementation.

6.14.2 Licensee-initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by the Quality Assurance Program Manual. This document shall contain:
  1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
  2. A determination that the change will maintain the level of radioactive effluent control required pursuant to 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose or setpoint calculations.
- b. Shall become effective after review and acceptance by the PORC and the approval of the General Manager Plant Operations.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

### 6.15 CONTAINMENT LEAKAGE RATE TESTING PROGRAM

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

## ADMINISTRATIVE CONTROLS

### CONTAINMENT LEAKAGE RATE TESTING PROGRAM (Continued)

The peak calculated containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is 44 psig.

The maximum allowable containment leakage rate,  $L_a$ , is 0.5% of containment air weight per day at  $P_a$ .

Leakage rate acceptance criteria are:

- a. Overall containment leakage rate acceptance criteria is  $\leq 1.0 L_a$ . During the first unit startup following each test performed in accordance with this program, the overall containment leakage rate acceptance criteria are  $\leq 0.60 L_a$  for the Type B and Type C tests and  $\leq 0.75 L_a$  for Type A tests.
- b. Air lock acceptance criteria are:
  1. Overall air lock leakage rate is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ .
  2. Leakage rate for each door seal is  $\leq 0.005 L_a$  when pressurized to  $\geq 10$  psig.
- c. Secondary containment bypass leakage rate acceptance criteria is  $\leq 0.06 L_a$  when tested at  $\geq P_a$ .
- d. Containment purge valves with resilient seals acceptance criteria is  $\leq 0.06 L_a$  when tested at  $\geq P_a$ .

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

## ADMINISTRATIVE CONTROLS

---

### 6.16 TECHNICAL SPECIFICATIONS BASES CONTROL PROGRAM

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the Technical Specifications shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following:
  1. A change in the Technical Specifications incorporated in the license; or
  2. A change to the UFSAR or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of Specification 6.16.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e) and exemptions thereto.