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Charles M. Dugger
Vice President, Operations
Waterford 3

W3F1-2000-0043
A4.05
PR

April 13, 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
Corrections to Miscellaneous Minor Changes to Previously
Submitted Technical Specifications Change Request

Gentlemen:

The purpose of this letter is to request the NRC Staff implement the attached corrected pages to the Technical Specifications changes requested by Letter W3F1-2000-0028 dated March 29, 2000. The Proposed Specifications (Attachment C) pages provided to the NRC Staff did not reflect all the requested changes included in the Proposed Marked-Up Specifications (Attachment B) pages.

Attachment C of this correspondence includes these corrections. Please replace Attachment C of Letter W3F1-2000-0028 in its entirety with Attachment C of this letter. Attachment B, Proposed Marked-Up Specifications, has been included for reference.

This proposed change has been evaluated in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c), and it has been determined that this request involves no significant hazards consideration.

ADD 1/1

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There are no new commitments generated by this correspondence.

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 April 13, 2000.

Very truly yours,



C.M. Dugger
Vice President, Operations
Waterford 3

CMD/AEW/rtk

Attachments: Attachment B
Attachment C

cc: (w/Attachments)
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 Corrections

ATTACHMENT B

PROPOSED MARKED-UP SPECIFICATIONS

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ADMINISTRATIVE CONTROLS

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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_s , is 44 psig.

The maximum allowable containment leakage rate, L_c , is 0.5% of containment air weight per day at P_s .

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

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.

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ON NEXT PAGE (6-26)

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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 Corrections

ATTACHMENT C

PROPOSED SPECIFICATIONS

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ADMINISTRATIVE CONTROLS

PROCESS CONTROL PROGRAM (Continued)

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