

Mr. Charles M. Dugger
Vice President Operations
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

May 9, 2000

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - ISSUANCE OF AMENDMENT RE: CHANGE TO THE TECHNICAL SPECIFICATIONS TO INSTITUTE A TECHNICAL SPECIFICATION BASES CONTROL PROGRAM AND TO PROVIDE FOR RECORD RETENTION AS SPECIFIED IN THE QUALITY ASSURANCE PROGRAM MANUAL (TAC NO. MA6174)

Dear Mr. Dugger:

The Commission has issued the enclosed Amendment No. 161 to Facility Operating License No. NPF-38 for the Waterford Steam Electric Station, Unit 3. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated July 15, 1999, as supplemented by letters dated March 29, 2000, April 13, 2000, April 25, 2000, and May 9, 2000.

The amendment changed the TSs to institute a TS Bases Control Program and to provide for record retention as specified in the Quality Assurance Program Manual.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/
N. Kalyanam, Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosures: 1. Amendment No. 161 to NPF-38
2. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION:

PUBLIC

PDIV-1 Reading

RidsOgcMailCenter

RidsAcrsAcnwMailCenter

RidsNrrDlpmPdiv (SRichards)

RidsNrrDripRtsb (WBeckner)

G.Hill(2)

RidsNrrPmDJaffe

RidsRgn4MailCenter (KBrockman)

L.Hurley, RIV

D.Bujol, RIV

*See previous concurrence

OFFICE	PDIV-1/PM	PDIV-1/LA	DRIP/RTSB	OGC	PDIV-1/SC
NAME	N.Kalyanam <i>kae</i>	DJohnson <i>dj</i>	W.Beckner*	R.Weisman*	RGramm <i>R6</i>
DATE	5/9/00	5/9/00		4/28/00	5/9/00

DOCUMENT NAME: G:\PDIV-1\Waterford\MA6174 Amendment Pkg.wpd
OFFICIAL RECORD COPY

Waterford Generating Station 3

cc:

Administrator
Louisiana Department of Environmental Quality
P. O. Box 82215
Baton Rouge, LA 70884-2215

Vice President, Operations Support
Entergy Operations, Inc.
P. O. Box 31995
Jackson, MS 39286

Director
Nuclear Safety Assurance
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

Wise, Carter, Child & Caraway
P. O. Box 651
Jackson, MS 39205

General Manager Plant Operations
Waterford 3 SES
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

Licensing Manager
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

Winston & Strawn
1400 L Street, N.W.
Washington, DC 20005-3502

Resident Inspector/Waterford NPS
P. O. Box 822
Killona, LA 70066-0751

Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Parish President Council
St. Charles Parish
P. O. Box 302
Hahnville, LA 70057

Executive Vice-President
and Chief Operating Officer
Entergy Operations, Inc.
P. O. Box 31995
Jackson, MS 39286-1995

Chairman
Louisiana Public Services Commission
Baton Rouge, LA 70825-1697



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-382

WATERFORD STEAM ELECTRIC STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 161
License No. NPF-38

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Operations, Inc. (the licensee) dated July 15, 1999, as supplemented by letters dated March 29, 2000, April 13, 2000, April 25, 2000, and May 9, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-38 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 161 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Gramm, Chief, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: May 9, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 161

TO FACILITY OPERATING LICENSE NO. NPF-38

DOCKET NO. 50-382

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

XVIII
6-23
6-24
6-25
6-26

Insert

XVIII
6-23
6-24
6-25
6-26

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 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 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 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 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 ≥ 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 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.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 161 TO

FACILITY OPERATING LICENSE NO. NPF-38

ENTERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION

By application dated July 15, 1999, as supplemented by letters dated March 29, 2000, April 13, 2000, April 25, 2000, and May 9, 2000, Entergy Operations, Inc. (the licensee), submitted a request for changes to the Waterford Steam Electric Station, Unit 3 (Waterford 3), Technical Specifications (TSs). The requested changes would change the TSs to institute a TS Bases Control Program (TSBCP) and to provide for record retention as specified in the Quality Assurance Program Manual (QAPM). The supplements dated March 29, 2000, April 13, 2000, April 25, 2000, and May 9, 2000, provided clarifying information that did not change the scope of the application or the Nuclear Regulatory Commission (NRC) staff's proposed no significant hazards consideration determination.

2.0 BACKGROUND

2.1 TECHNICAL SPECIFICATION BASES CONTROL PROGRAM

The licensee has proposed to add a TSBCP to the Waterford 3 TSs. The TSBCP would be added as a new TS 6.16.

Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.36, "Technical specifications" requires, in part, that, "A summary statement of the bases or reasons for such [technical] specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the technical specifications." In practice, the TS Bases are appended to the TS but are not actually a part of the TS as already noted. Licensees have routinely submitted changes to these Bases as part of applications for license amendments when licensees have sought to change their TS. Most changes to the Bases, as well as those to the Updated Final Safety Analysis Report (UFSAR), have the potential for only minimal effects on safety, and such changes may be instituted without prior Commission approval. The requirements of 10 CFR Part 50, Section 50.59, "Changes, tests and experiments," delineate which changes to a facility, as described in the UFSAR, may be made without prior Commission approval, and by extension, which changes do require prior

without prior Commission approval, and by extension, which changes do require prior Commission approval. If a licensee undertakes to change the UFSAR, or the TS Bases, without prior Commission approval, the Commission must still be notified of such changes. The requirements of 10 CFR Part 50, Section 50.71(e), specify the frequency at which licensees must provide to the Commission notification of changes made to the UFSAR without prior Commission approval. The licensee's proposed TSBCP would (1) specify administrative controls necessary for control of changes to the Bases, (2) delineate which changes to the Bases/UFSAR can or cannot be made without prior Commission approval, (3) provide for consistency between the Bases and the UFSAR, and (4) provide for notification to the Commission of changes to the Bases made without prior Commission approval.

2.2 RECORD RETENTION AS SPECIFIED IN THE QUALITY ASSURANCE PROGRAM MANUAL

Amendment No. 146 to the Facility Operating License for Waterford 3, issued on October 19, 1998, authorized the transfer of various administrative requirements from the TS to the QAPM, including the record retention requirements in TS 6.10, "RECORD RETENTION." With issuance of Amendment No. 146, TS 6.10 was deleted, since its function was subsumed in the QAPM; however, TS 6.13.2a, "PROCESS CONTROL PROGRAM (PCP)" and TS 6.14.2, "OFFSITE DOSE CALCULATION MANUAL (ODCM)" still made reference to TS 6.10 regarding record retention. With submittal of the July 15, 1999, application, as supplemented by letters dated March 29, 2000, April 13, 2000, April 25, 2000, and May 9, 2000, the licensee has requested that the references to TS 6.10 in TS 6.13.2a and TS 6.14.2a be changed to, "the Quality Assurance Program Manual."

3.0 EVALUATION

3.1 TECHNICAL SPECIFICATION BASES CONTROL PROGRAM

The licensee's proposed TS 6.16, based upon guidance contained in NUREG-1432, "Standard Technical Specifications - Combustion Engineering Plants," would define the minimum administrative and 10 CFR Part 50 requirements that apply to the program which controls changes to the TS Bases.

Proposed TS 6.16.a would require that, "Changes to the Bases of the Technical Specifications shall be made under appropriate administrative controls and reviews." This requirement is appropriate since changes to the TS Bases involve quality (safety)-related activities and programs. Appendix B to 10 CFR Part 50, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," Criterion V, "Instructions, Procedures, and Drawings," requires in part, that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances...." The "appropriate administrative controls and reviews" requirement of proposed TS 6.16.a would include the documented instructions/procedures required by Appendix B to 10 CFR Part 50. Accordingly, the proposed TS 6.16.a meets the regulatory requirements of 10 CFR Part 50, Appendix B and is acceptable.

Proposed TS 6.16.b states the following:

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.

Furthermore, Proposed TS 6.16.d states, in part, "Proposed changes that meet the criteria of [Technical] Specification 6.16.b above shall be reviewed and approved by the NRC prior to implementation...." Proposed TSs 6.16.b and 6.16.d are consistent with the requirements of 10 CFR 50.59(c) and are, therefore, acceptable.

Proposed TS 6.16.c states, "The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR." Furthermore, proposed TS 6.16.d states, in part, "...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." The provision of proposed TSs 6.16.c and 6.16.d are necessary in that there is a high degree of commonality between the UFSAR and the TS Bases. It is important that the UFSAR and Bases maintain consistency so as not to introduce uncertainty regarding the design basis of the facility. Moreover, these changes should be reported on the same frequency so that the NRC may maintain an up-to-date record of the design basis of the facility. The proposed TS achieve these goals. Based upon the above, proposed TSs 6.16.c and 6.16.d are acceptable.

In summary, proposed TS 6.16 provides for appropriate administrative controls to the TS Bases in accordance with 10 CFR Part 50, Appendix B. In addition, for proposed TS 6.16, those UFSAR/Bases changes that can be accomplished without prior Commission approval are differentiated from those requiring prior Commission approval in accordance with 10 CFR 50.59. Finally, proposed TS 6.16 contains requirements for maintaining consistency between the TS Bases and the UFSAR with regard to content and update schedule. Accordingly, proposed TS 6.16 is acceptable.

3.2 RECORD RETENTION AS SPECIFIED IN THE QUALITY ASSURANCE PROGRAM MANUAL

At the present time, TS 6.13.2.a and TS 6.14.2.a require that record retention for changes to the PCP and ODCM be as specified in TS 6.10.3p, which was deleted in License Amendment No. 146; the licensee has proposed changing the "TS 6.10.3p" reference to "the Quality Assurance Program Manual."

The Safety Evaluation prepared by the NRC staff in support of License Amendment No. 146 addressed the issues associated with transferring the record retention requirements of TS 6.10 from the TS to the QAPM which may be summarized as follows:

Improvements for Nuclear Power Reactors" published in the *Federal Register* on July 22, 1993 (58 FR 39232), as codified in 10 CFR 50.36.

2. The relocation of the records retention requirements was a verbatim shift of requirements from TS 6.10 to the QAPM.
3. Sufficient regulatory controls, associated with the QAPM, exist to assure that relocation of record retention requirements from TS 6.10 to the QAPM is acceptable.

The NRC staff concludes that all relevant issues associated with transferring the record retention requirements of TS 6.10 from the TS to the QAPM were addressed in Amendment No. 146. Accordingly, the licensee's proposed change to TS 6.13.2.a and TS 6.14.2.a, which changes the "TS 6.10.3p" reference to "the Quality Assurance Program Manual," is acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Louisiana State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (65 *FR* 4274, dated January 26, 2000).

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: D. H. Jaffe

Date: May 9, 2000