



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

W3F1-2000-0086
A4.05
PR

June 15, 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
Technical Specification Change Request NPF-38-226
Response to Request for Additional Information Regarding
Containment Building Penetrations

Gentlemen:

By letter dated January 12, 2000, Entergy Operations, Inc. (EOI) proposed changes to the Waterford 3 (W3) Technical Specifications that would allow the containment equipment door, airlocks, and other penetrations to remain open, but capable of being closed, during core alterations and irradiated fuel movement in containment. By a letter dated April 25, 2000, the NRC Staff provided two questions regarding information needed to support the review of our request. A response to those questions is attached.

This original change was evaluated in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c), and was determined to not involve any significant hazards consideration. The attached responses do not impact that determination.

The circumstances surrounding this change do not meet the NRC Staff's criteria for exigent or emergency review. EOI had originally requested approval by June 2000. This change will provide benefit during our upcoming outage. With this supplemental information, EOI requests that the approval be granted by August 1, 2000. EOI further requests the effective date for this change be within 60 days of approval.

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Based on the response to question 2, a new item has been added to the commitment list of the original submittal. Attachment 3 provides an updated version of the list. Should you have any questions or comments concerning this request, please contact Jerry Burford at (601) 368-5755.

Pursuant to 28 U.S.C.A. Section 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on June 15, 2000.

Very truly yours,



C.M. Dugger
Vice President, Operations
Waterford 3

CMD/fgb/dah

Attachments: 1. Response to Request for Additional Information
2. Site Photo
3. Commitment Identification/Voluntary Enhancement Form

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

ATTACHMENT 1
To W3F1-2000-0086

NPF-38-226

Response to Request for Additional Information

Technical Specification Change NPF-38-226

Containment Building Penetrations during Core Alterations and Fuel Movement

**Response to Request for Additional Information
Technical Specification Change NPF-38-226
Containment Building Penetrations during Core Alterations and Fuel Movement**

Question 1

The current Final Safety Analysis Report analyses assume a control room unfiltered leakage of 13 cfm. How is this value verified?

Response

The assumed control room unfiltered leakage of 13 cfm consists of 3 cfm inleakage for controlled egress and ingress, and 10 cfm inleakage from the normal air intake valves. Waterford Unit 3 (W3) established the 3 cfm value based on the W3 control room design consistent with the guidance in Section 6.4 of NUREG 0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," (SRP). This value is not verified by testing. The normal intake valve leakage is verified by periodic leak testing of the normal intake isolation valves. The acceptance criteria for the normal intake valve leakage is 10cfm. These valves are currently leak-tested quarterly but the testing frequency may be extended in the future based on performance.

The W3 control room air conditioning system automatically initiates the emergency mode of operation on either a safety injection actuation signal or a high radiation signal at the normal outside air intake. There are two modes of emergency operation – isolated and pressurized. The control room air conditioning system automatically aligns in the isolated mode on either of the signals noted above. The operators may then enter the pressurized mode by manually opening either the north or south emergency intake (based on the radiation level at the intakes) to provide filtered outside air. An emergency intake flow rate of 200 cfm or less is capable of pressurizing the control room to 0.125" water gauge (wg). Because all of the control room ventilation equipment and majority of the ductwork are within the control room envelope, the potential for unfiltered inleakage is minimized. A portion of the fan suction ductwork is located outside the envelope and may be at a slightly lower pressure than the surrounding area prior to entering the envelope. However, any inleakage into this duct passes through the filters before it is released to the envelope. Testing is also performed to ensure that the above pressurization conditions can be maintained at the flow rate of 200 cfm or less.

Entergy Operations, Inc. (EOI) is also aware of the joint industry and NRC Staff effort to investigate the issue of control room habitability. A primary objective of the effort is to address findings by several plants that the unfiltered inleakage may be greater than had originally been assumed in the safety analyses. EOI is actively participating in industry meetings and initiatives established to resolve this issue. The question of unfiltered

inleakage to the control room is of greater impact on the radiological consequences of the limiting loss of coolant accident (LOCA) analysis. The accident in question for this submittal, the fuel handling accident, is much less severe and its impact on control room doses is well under that for the LOCA. Since the habitability effort is already being handled as a generic industry issue which will consider the bounding control room dose calculation, EOI requests the NRC Staff approve this request based on our treatment consistent with the W3 current licensing basis. EOI commits to monitor the industry effort to develop a guidance document and will evaluate actions for implementation once the NRC Staff has indicated their concurrence with the industry approach.

Question 2

Please provide information on the locations of the control room intakes, equipment hatch, and any other release paths for the fuel handling accident inside containment as proposed in the submittal. Include a diagram or site plan of the Waterford Steam Electric Station, Unit 3 site indicating the locations of the control room, control room intakes, equipment hatch, and intervening buildings.

Response

Attachment 2 provides a site photo with hatch locations and outside air intakes noted. In addition, site general arrangement drawings in the UFSAR provide additional clarification of the relative locations of these areas. In particular, UFSAR Figures 1.2-8 (now in the reference drawing section of the last UFSAR volume), 1.2-18, and 1.2-19 provide information on the hatches, personnel air locks, and intakes of interest.

The equipment hatch is located at approximately azimuth 278° and a centerline elevation of 26.5' (see UFSAR Figure 1.2-18). The personnel airlock is at approximately azimuth 172° and a centerline elevation of 11' (see UFSAR Figure 1.2-19). The emergency airlock is located at approximately azimuth 322° and a centerline elevation of 25' (see UFSAR Figure 1.2-18).

The normal control room outside air intakes and north emergency outside air intakes are located on the outside north facing wall at approximately elevation 73'. The south emergency air intakes are located on a south facing wall at approximately elevation 75'.

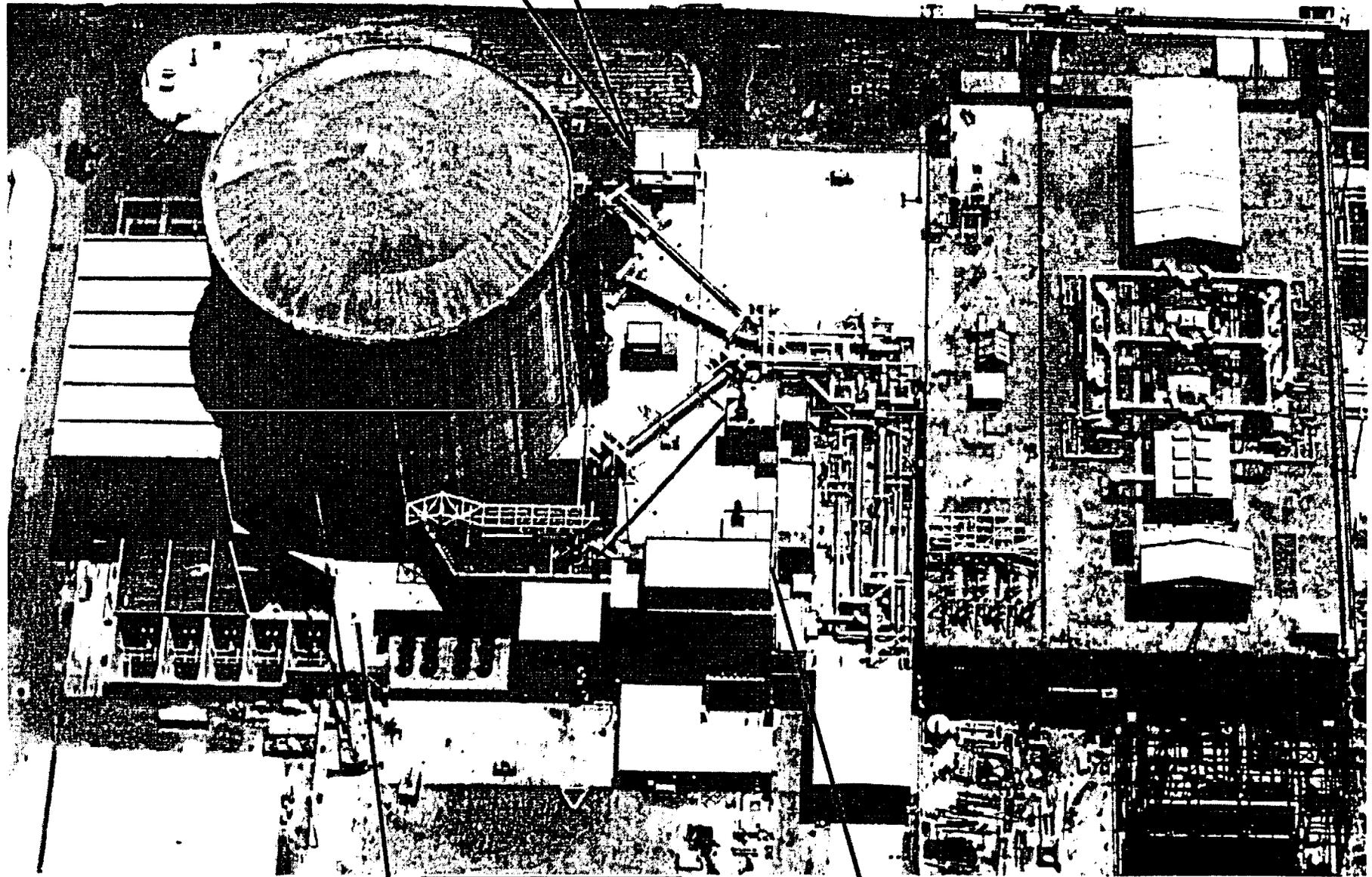
ATTACHMENT 2
To W3F1-2000-0086

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Site Photograph

North Emergency OAI

Normal Outside Air Intake



Equipment Hatch
(under concrete cover)

South Emergency OAI

ATTACHMENT 3
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**COMMITMENT IDENTIFICATION/VOLUNTARY
ENHANCEMENT FORM**

COMMITMENT IDENTIFICATION/VOLUNTARY ENHANCEMENT FORM

Attachment 3 to W3F1-2000-0086
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COMMITMENT(S)	ONE-TIME ACTION*	CONTINUING COMPLIANCE*	SCHEDULED COMPLETION DATE (IF REQUIRED)	ASSOCIATED CR OR ER
Entergy commits to take action to have the containment equipment hatch closed within 30 minutes of the determination of the need to evacuate containment.		X	Upon Implementation of Approved Amendment	
Implement administrative procedures that ensure in the event of a Fuel Handling Accident that the containment equipment hatch and at least one door in each personnel airlock will be closed following containment evacuation, and that the open penetrations can and will be promptly closed.		X	Upon Implementation of Approved Amendment	
Monitor the industry effort to develop a guidance document addressing control room habitability and evaluate actions for implementation once the NRC Staff has indicated their concurrence with the industry approach.	X		Upon Issuance and NRC Acceptance of the Industry Guidance Document (expected early 2001)	