July 3, 2000

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

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - REQUEST FOR

ADDITIONAL INFORMATION RELATED TO TECHNICAL SPECIFICATION CHANGE REQUEST REGARDING THE EMERGENCY FEEDWATER SYSTEM

(TAC NO. MA2189)

Dear Mr. Dugger:

By letter dated May 5, 1998, as supplemented by letter dated January 31, 2000, Entergy Operations, Inc. proposed changes to Waterford Steam Electric Station, Unit 3, Technical Specification 3.7.1.2 and Surveillance Reqirement 4.7.1.2 for the Emergency Feedwater System.

After reviewing your request, the Nuclear Regulatory Commission (NRC) staff has determined that additional information is required to complete the review. On June 27, 2000, NRC staff discussed this required additional information with your staff during a telephone conference call. As discussed on the telephone, please provide your response to the enclosed questions by July 19, 2000.

Should you need further information, please call me at (301) 415-1480.

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

Enclosure: As stated

cc w/encl: See next page

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WATERFORD STEAM ELECTRIC STATION, UNIT 3 (WATERFORD 3)

REQUEST FOR ADDITIONAL INFORMATION

(TAC NO. MA2189)

Reference: Enclosure Two to Waterford 3 letter dated January 31, 2000, Technical Specification Change Request NPF-38-206, Revision 1.

- 1. Second paragraph of Answer #1
- 1a. What is the meaning of "greater" in "greater than 13 minutes?" how much greater than 13 minutes?
- 1b. American National Standards Institute/American Nuclear Society (ANSI/ANS) Standard ANSI/ANS-58.8-1984 shows a minimum of 10 minutes for Time Test #1 (Plant Condition 3, Loss of Off-site Power (LOOP)). Added to that would be a minimum of four minutes for Time Test #2 (PC 3, LOOP, one manipulation). Added to that would be one minute per additional operator manipulation. Added to that would be equipment process time. Assuming only one manipulation and no equipment process time, the result is already at 14 minutes. Please explain how you arrived at a time delay of from two to six minutes using the referenced standard.
- 1c. How many isolation valves must be closed? How many operator manipulations per valve?
- 1d. Describe process for reducing emergency feedwater (EFW) flow. How many operator manipulations are required?
- 2. Third paragraph of Answer #1
- 2a. What is the meaning of "more" in "more than 8 minutes?" how much greater than eight minutes?
- 3. Should you plan to take exception to the time criteria of ANSI/ANS-58.8-1984, it is necessary to justify the exception by developing operator action times based on a task analysis and an independent data base. Please provide the justification for this exception.
- 4. Please provide a time criteria in accordance with the provisions of ANSI/ANS-58.8-1984 with the maximum EFW flow of 2300 gallons per minute to a single steam generator during a main steam line break.

Waterford Generating Station 3

CC:

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