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W3F1-2001-0033
A4.05
PR

May 3, 2001

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-38-231
Elimination of Post-Accident Sampling Program Requirement

Gentlemen:

In accordance with 10CFR50.90, Entergy Operations, Inc. (EOI) is hereby proposing to amend Operating License NPF-38 for Waterford 3 by requesting NRC Staff review and approval of the attached change to the Technical Specifications (TS). The proposed change eliminates the TS 6.8.4.d requirement to maintain a program for post-accident sampling capability. The attached description and safety analysis support the proposed change to the Waterford 3 TS. This change is desirable in order to reduce unnecessary regulatory burden.

The proposed amendment would delete Technical Specification (TS) 6.8.4.d, "Post Accident Sampling," and thereby eliminate the requirements to have and maintain the Post Accident Sampling System (PASS) at Waterford 3. The changes are consistent with NRC approved Technical Specification Task Force (TSTF) change TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced in the Federal Register on October 31, 2000 as part of the consolidated line item improvement process (CLIIP). As discussed in the notice, this request also revises TS 6.8.4.a, "Primary Coolant Sources Outside Containment," to reflect the elimination of PASS.

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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.

The circumstances surrounding this change do not meet the NRC Staff criteria for exigent or emergency review. EOI requests review and approval of this amendment by December 31, 2001. Waterford 3 will have their annual EP exercise during December 2001; on this basis, EOI requests the effective date for this TS change be either February 28, 2002 or within 60 days of approval, whichever is later.

The commitments associated with this submittal are specified in Attachment 3. 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 May 3, 2001.

Very truly yours,



J. T. Herron
Vice President, Operations
Waterford 3

JTH/fgb/ssf

Attachments: 1. NPF-38-231, Technical Specification Change Request
2. NPF-38-231, Proposed Marked-Up Specifications
3. Summary of Commitments

cc: E.W. Merschoff, NRC Region IV
N. Kalyanam, NRC-NRR
J. Smith
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NRC Resident Inspectors Office
Louisiana DEQ/Surveillance Division
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ATTACHMENT 1
To W3F1-2001-0033

NPF-38-231

Technical Specification Change Request
Elimination of Post-Accident Sampling Program Requirement

DESCRIPTION AND NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION OF PROPOSED CHANGE NPF-38-231

Summary of Proposed Change

This proposed license amendment revises Technical Specification (TS) 6.8.4.a, "Primary Coolant Sources Outside Containment," and deletes TS 6.8.4.d, "Post Accident Sampling." Specifically, the proposed change would update TS 6.8.4.a to reflect the possible future capping of the post-accident sampling penetrations. This change recognizes elimination of the post-accident sampling system (PASS) program requirement, which is the proposed change to TS 6.8.4.d included in this submittal. Since the PASS system is referenced in TS 6.8.4.a, a change is needed to make it clear that, pending a modification, the piping associated with the PASS may still represent a possible leakage path outside of containment. With the elimination of the PASS program, Waterford 3 may, in the future, permanently isolate the associated penetrations and thus also eliminate this potential source of reactor coolant outside containment.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366 (Reference 1). The availability of this technical specification improvement as part of the consolidated line item improvement process (CLIP) was announced in Federal Register, Volume 65, No. 211 (65 FR 65018, Reference 2) on October 31, 2000.

Proposed Marked-up Specification

See Attachment 2.

Background

The Combustion Engineering Owners Group (CEOG) Topical Report CE NPSD-1157, Revision 1, "Technical Justification for the Elimination of the Post-Accident Sampling System from the Plant Design and Licensing Bases for CEOG Utilities," evaluated the PASS requirements to determine their contribution to plant safety and accident recovery. The topical report concluded that the current PASS samples specified in NUREG-0737, "Clarification of TMI Action Plan Requirements," may be eliminated from the Technical Specifications. In the review of the Topical Report, the NRC agreed that PASS may be eliminated since the information provided by PASS was either unnecessary or is effectively provided by other indications of process parameters or measurement of radiation levels. The NRC review of CE-NPSD-1157 is documented in a safety evaluation issued May 16, 2000. The CEOG re-issued the topical report including the safety evaluation as CE-NPSD-1157-A in July, 2000 (Reference 3).

Description and Safety Considerations

EOI has reviewed the safety evaluation published on October 31, 2000 as part of the CLIP. This verification included a review of the NRC Staff's evaluation as well as the information provided to support TSTF-366 (i.e., The CE Topical Report CE-NPSD-1157-A). EOI has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC Staff are applicable to Waterford 3 and justify this amendment for the incorporation of the changes into the Waterford 3 TS.

As discussed in the notice of availability published in the Federal Register on October 31, 2000 for the PASS elimination technical specification improvement, consideration of a request to eliminate PASS under the CLIP would involve certain commitments. EOI has evaluated the identified topics and makes the following plant-specific commitments, which are consistent with the NRC evaluation criteria:

1. EOI will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in the Waterford 3 emergency plan implementing procedures and will be implemented during the implementation period following issuance of the approved license amendment. The development of these contingency plans is considered a regulatory commitment.
2. EOI will establish the capability for classifying fuel damage events at the Alert level threshold. This level of core damage correlates to an RCS radioactivity level of 300 $\mu\text{Ci/cc}$ dose equivalent iodine. This capability will be described in the Waterford 3 emergency plan implementing procedures and will be implemented during the implementation period following the issuance of the approved license amendment. The development of the capability for classifying fuel damage events is considered a regulatory commitment.
3. EOI will establish the capability to monitor radioactive iodines that have been released to offsite environs. This capability will be described in the Waterford 3 emergency plan implementing procedures. The development of the capability to monitor radioactive iodines is considered a regulatory commitment.

The above commitments are summarized in Attachment 3.

Optional Changes and Variations

EOI is not proposing any variations or deviations from the technical specification changes described in TSTF-366 or the NRC staff's model safety evaluation published in the Federal Register on October 31, 2000 (65 FR 65018).

The Waterford 3 TS include an administrative requirement for a program to minimize the leakage from those portions of systems outside containment that contain highly radioactive fluids during a serious transient or accident. PASS is specifically listed in TS 6.8.4.a as falling under the scope of this requirement. As discussed in the staff's model safety evaluation published on October 31, 2000, EOI is considering a possible modification to eliminate the PASS piping as a potential source of primary coolant leakage outside of containment. However, this modification may not be complete within the requested implementation period. On this basis, EOI is proposing to add the following phrase to the reference to PASS in TS 6.8.4.a: "(pending a modification to eliminate PASS as a potential leakage path)." This phrase makes it clear that PASS is subject to the TS 6.8.4 program as long as it represents a possible leak path. This statement also recognizes that the actual modification schedule and will enable it to be performed at some future date under 10CFR50.59 without requiring any additional change to the Technical Specifications.

Waterford 3 has also proposed an administrative change to move the bulleted items associated with TS 6.8.4.b to the preceding page. In this way the entire specification is presented on a single page and the usability of this specification is enhanced. This change does not revise any technical requirements beyond that addressed by the NRC Staff in the model evaluation published on October 31, 2000.

No Significant Hazards Consideration Determination

Entergy Operations (EOI) has reviewed the proposed No Significant Hazards Consideration Determination published on October 31, 2000 as part of the CLIIP. EOI has concluded that the proposed determination presented in the notice is applicable to Waterford 3 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

Environmental Impact Evaluation

Entergy Operations (EOI) has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000 as part of the CLIIP. EOI has determined that the staff's findings presented in that evaluation are applicable to Waterford 3 and the evaluation is hereby incorporated by reference for this application.

References

1. Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366.
2. Federal Register, Volume 65, No. 211 (65 FR 65018, Reference 2), published October 31, 2000.
3. Combustion Engineering Owners Group (CEOG) Topical Report CE NPSD-1157-A, "Technical Justification for the Elimination of the Post-Accident Sampling System from the Plant Design and Licensing Bases for CEOG Utilities", dated July, 2000.

ATTACHMENT 2
To W3F1-2001-0033

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PROPOSED MARKED-UP SPECIFICATIONS

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

- j. OFFSITE DOSE CALCULATION MANUAL implementation.
- k. Quality Assurance Program for effluent and environmental monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 Not Used

6.8.3 Not Used

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the containment spray, safety injection, hydrogen analyzer, ~~and the post-accident sampling system~~ (pending a modification to eliminate PASS as a potential leakage path), and portions of the containment vacuum relief and primary sampling systems. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements, and
2. Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

- ~~1. Training of personnel,~~
- ~~2. Procedures for monitoring, and~~
- ~~3. Provisions for maintenance of sampling and analysis equipment.~~

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

1. Identification of a sampling schedule for the critical variables and control points for these variables,
2. Identification of the procedures used to measure the values of the critical variables,
3. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage,
4. Procedures for the recording and management of data,
5. Procedures defining corrective actions for all off-control point chemistry conditions, and
6. A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

d. Post-accident Sampling Deleted

~~A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodine and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:~~

- ~~1. Training of personnel,~~
- ~~2. Procedures for sampling and analysis, and~~
- ~~3. Provisions for maintenance of sampling and analysis equipment.~~

e. Basemat Monitoring

A program for monitoring of the Nuclear Plant Island Structure (NPIS) Common Foundation Basemat to ensure the continued integrity of the Basemat. The program shall include:

1. settlement of the basemat
2. changes in ground water chemistry that could effect corrosion of reinforcing steel
3. seasonal variation in ground water levels
4. monitoring of significant cracking in the basemat.

ATTACHMENT 3
To W3F1-2001-0033

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Summary of Commitments
Related to the Request to Eliminate PASS

SUMMARY OF COMMITMENTS

COMMITMENT(S)	One-Time Action*	Continuing Compliance*	Scheduled Completion Date	Related CR or ER
<p>EOI will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in the Waterford 3 emergency plan implementing procedures and will be implemented during the implementation period following issuance of the approved license amendment. This is considered a regulatory commitment.</p>		X	<p>During the implementation period of the approved license amendment</p>	
<p>EOI will establish the capability for classifying fuel damage events at the Alert level threshold. This level of core damage correlates to RCS radioactivity levels of 300 $\mu\text{Ci/cc}$ dose equivalent iodine. This capability will be described in the Waterford 3 emergency plan implementing procedures. This is considered a regulatory commitment.</p>		X	<p>During the implementation period of the approved license amendment</p>	
<p>EOI will establish the capability to monitor radioactive iodines that have been released to offsite environs. This capability will be described in the Waterford 3 emergency plan implementing procedures. This is considered a regulatory commitment.</p>		X	<p>During the implementation period of the approved license amendment</p>	

*Check one only