

Docket No.: 50-382

4/3/87

Mr. J. G. Dewease  
Senior Vice President - Nuclear Operations  
Louisiana Power and Light Company  
317 Baronne Street, Mail Unit 17  
New Orleans, Louisiana 70160

Dear Mr. Dewease:

SUBJECT: ISSUANCE OF AMENDMENT NO. 18 TO FACILITY OPERATING LICENSE NO. NPF-38  
FOR WATERFORD 3

The Commission has issued the enclosed Amendment No. 18 to Facility Operating License No. NPF-38 for the Waterford Steam Electric Station, Unit 3. The amendment consists of changes to the Technical Specifications in response to your applications transmitted by letter dated October 15, 1986, as supplemented by letter dated November 19, 1986 and February 9, 1987. The November, 1986 and February 9, 1987 letters were explanatory in nature and did not make any substantive changes.

The amendment changes the Appendix A Technical Specifications by updating the organizational charts in Section 6 to reflect the reorganization within LP&Ls Nuclear Operations group.

A copy of the Safety Evaluation supporting the amendment is also enclosed.

Sincerely,

James H. Wilson, Project Manager  
PWR Project Director No. 7  
Division of PWR Licensing-B

Enclosures:

- 1. Amendment No. 18 to NPF-38
- 2. Safety Evaluation

cc: See next page

PD7 *JW*  
JWilson  
3/26/87

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3/26/87

~~PEICSB  
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Waterford 3

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ISSUANCE OF AMENDMENT NO. 18 TO FACILITY OPERATING  
LICENSE NP. NPF-38 FOR WATERFORD 3

DISTRIBUTION

Docket File 50-382

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

LOUISIANA POWER AND LIGHT COMPANY

DOCKET NO. 50-382

WATERFORD STEAM ELECTRIC STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 18  
License No. NPF-38

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment, dated October 15, 1986, as supplemented by letters dated November 19, 1986 and February 9, 1987, by Louisiana Power and Light Company (licensee), complies with standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's 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 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;
  - 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:

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PDR ADOCK 05000382  
P PDR

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 18, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in this license. LP&L shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



James H. Wilson, Project Manager  
PWR Project Directorate No. 7  
Division of PWR Licensing-B

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: April 3, 1987

- 3 -

ATTACHMENT TO LICENSE AMENDMENT NO. 18  
TO FACILITY OPERATING LICENSE NO. NPF-38  
DOCKET NO. 50-382

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Also to be replaced are the following overleaf pages to the amended pages.

<u>Amendment Pages</u>	<u>Overleaf Pages</u>
6-1	-
6-2	-
6-3	-
6-4	-
6-6	6-5
6-7	-
6-8	-
6-9	-
6-10	-
6-12	6-11
6-13	6-14

Page B 3/4 1-5 is reissued to add lines inadvertently omitted when the page was revised by Amendment 12.

## ADMINISTRATIVE CONTROLS

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### 6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Supervisor, or during his absence from the control room, a designated individual shall be responsible for the control room command function. A management directive to this effect, signed by the Vice President - Nuclear, shall be reissued to all station personnel on an annual basis.

### 6.2 ORGANIZATION

#### MANAGEMENT AND TECHNICAL SUPPORT

6.2.1 The organization for unit management and technical support shall be as shown in Figure 6.2-1.

#### UNIT STAFF

6.2.2 The unit organization shall be as shown in Figure 6.2-2 and:

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room.
- c. A Health Physics Technician\* shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- e. A site fire brigade of at least five members shall be maintained on site at all times.\* The fire brigade shall not include the Shift Supervisor, the Shift Technical Advisor, nor the two other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.

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\*The Health Physics Technician and fire brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

## ADMINISTRATIVE CONTROLS

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### UNIT STAFF (Continued)

- f. Administrative procedures shall be developed and implemented to limit the working hours of individuals of the nuclear power plant operating staff who are responsible for manipulating plant controls or for adjusting on-line systems and equipment affecting plant safety which would have an immediate impact on public health and safety.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the plant is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, the following guidelines shall be followed:

1. An individual shall not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual shall not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours shall be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime shall be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager, the assistant Plant Managers, the Operations Superintendent or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime will be reviewed monthly by the Plant Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

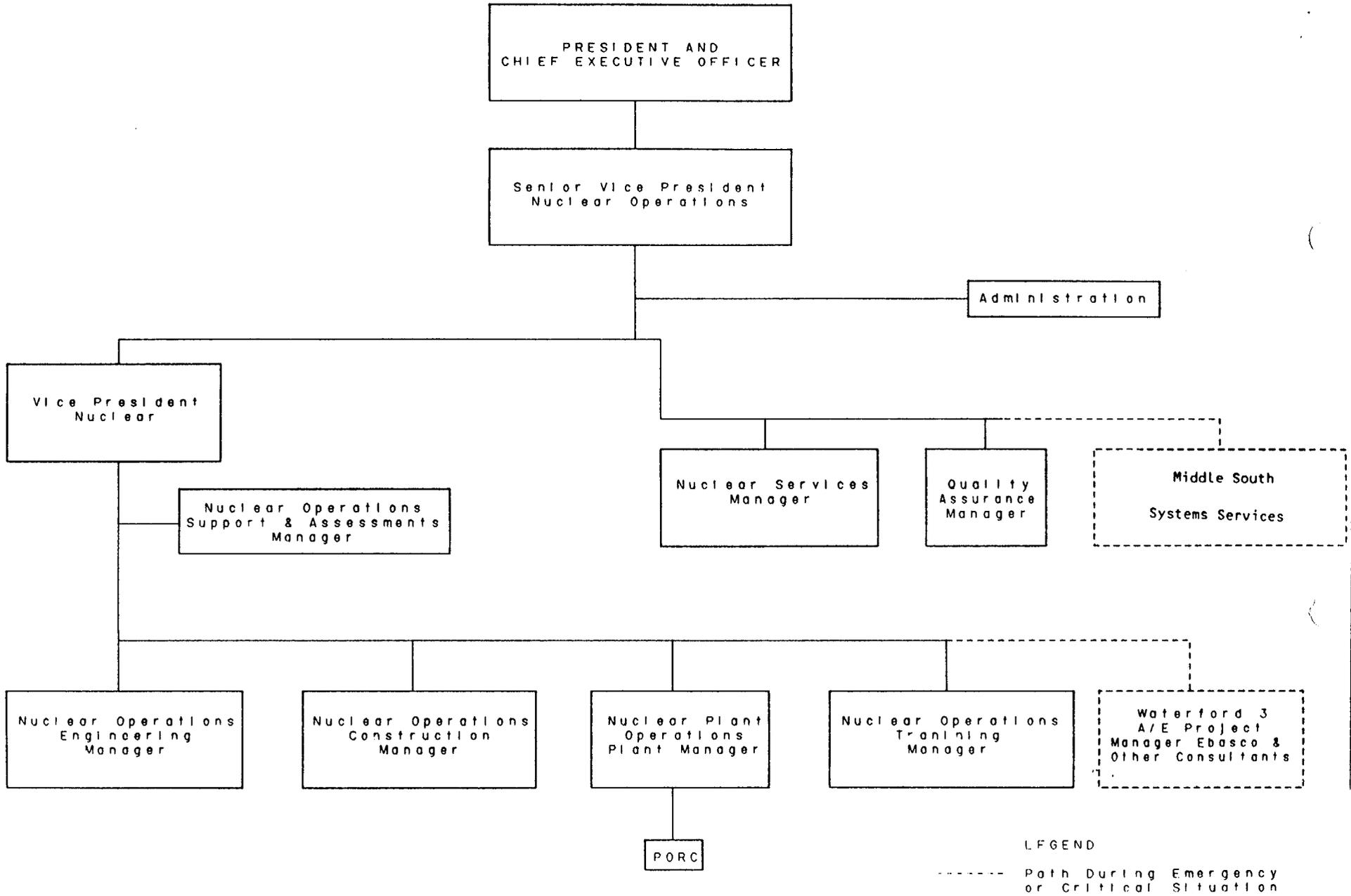


FIGURE 6.2-1  
ORGANIZATION FOR MANAGEMENT AND TECHNICAL SUPPORT

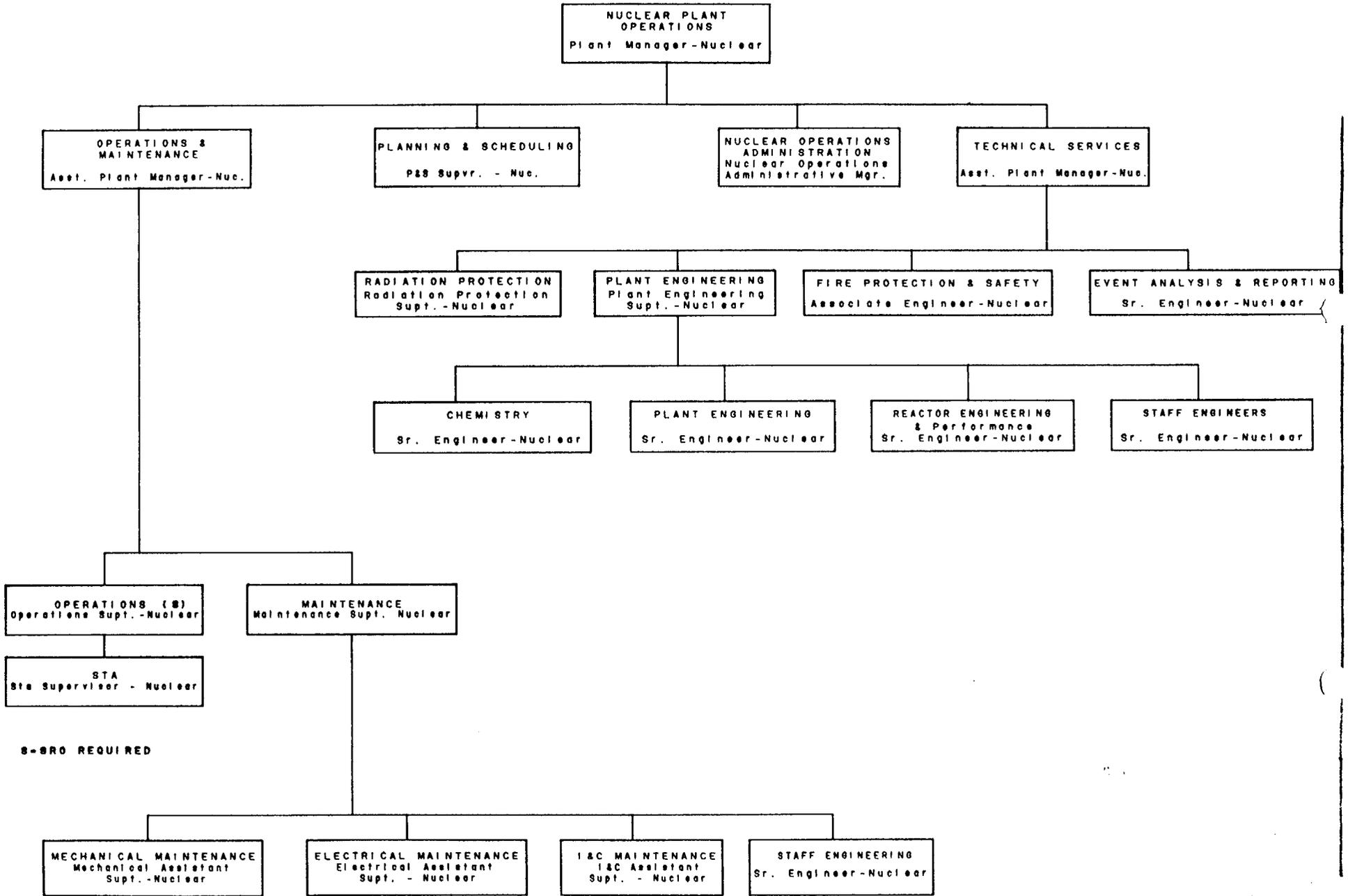


FIGURE 6.2-2  
PLANT OPERATIONS ORGANIZATION

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	MODE 1, 2, 3, OR 4	MODE 5 OR 6
SS	1*	1
SRO	1*	None
RO	2	1
AO	2	1
STA	1*	None

- SS - Shift Supervisor with a Senior Operator License
- SRO - Individual with a Senior Operator License
- RO - Individual with an Operator License
- AO - Auxiliary Operator
- STA - Shift Technical Advisor

Except for the Shift Supervisor, the shift crew composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Shift Supervisor from the control room while the unit is in MODE 1, 2, 3 or 4, an individual (other than the Shift Technical Advisor) with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Shift Supervisor from the control room while the unit is in MODE 5 or 6, an individual with a valid Senior Operator or Operator license shall be designated to assume the control room command function.

\*An individual with SRO/STA qualifications can satisfy the SS/STA or SRO/STA position requirements simultaneously.

## ADMINISTRATIVE CONTROLS

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### 6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

#### FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to the Nuclear Operations Support and Assessment Manager.

#### COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field.

#### RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification\* that these activities are performed correctly and that human errors are reduced as much as practical.

#### AUTHORITY

6.2.3.4 The ISEG is an onsite independent technical review group that reports to the Nuclear Operations Support and Assessment Manager. The ISEG shall have the authority necessary to perform the functions and responsibilities as delineated above.

#### RECORDS

6.2.3.5 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Nuclear Operations Support and Assessment Manager.

### 6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The STA shall meet the requirements of either Option 1 or 2 as shown below:

- a. Option 1 - Combined SRO/STA Position. This option is satisfied by assigning an individual with the following qualifications to each operating shift crew as one of the SRO's required by 10 CFR 50.54(m) (2) (i):

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\*Not responsible for sign-off function.

## ADMINISTRATIVE CONTROLS

### 6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 except that:

- a. The Radiation Protection Superintendent shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September 1975.
- b. Personnel in the Health Physics, Chemistry and Radwaste Departments shall meet or exceed the minimum qualifications of ANSI N18.1-1971.
- c. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees.
- d. Personnel in the Nuclear Quality Assurance Department, and other staff personnel who perform inspection, examination, and testing functions, shall meet or exceed the minimum qualifications of Regulatory Guide 1.58, Rev. 1, September 1980. (Endorses ANSI N45.2.6-1978)

### 6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Training Manager-Nuclear and shall meet or exceed the requirements and recommendations of Section 5.2 of ANSI 3.1-1978 and Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

##### FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

##### COMPOSITION

6.5.1.2 The PORC shall be composed of the:

Chairman:	Assistant Plant Manager (Technical Services or Operations and Maintenance)
Vice Chairman:	Plant Engineering Superintendent
Member:	Maintenance Superintendent
Member:	Operations Superintendent
Member:	Radiation Protection Superintendent
Member:	Management Knowledgeable in Quality Assurance/Control

## ADMINISTRATIVE CONTROLS

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### ALTERNATES

6.5.1.3 In the absence of the PORC Chairman and Vice Chairman, the Plant Manager will appoint a temporary Chairman. All other alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

### MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

### QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and three members, including alternates.

### RESPONSIBILITIES

6.5.1.6 The PORC shall be responsible for the below listed activities. The PORC may delegate the performance of reviews but will maintain cognizance over and responsibility for them.

- a. Review of (1) all procedures required by Specification 6.8 and changes thereto, (2) all programs required by Specification 6.8 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety.
- e. Review of investigations of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Plant Manager and to the Safety Review Committee.
- f. Review of all REPORTABLE EVENTS.

## ADMINISTRATIVE CONTROLS

### RESPONSIBILITIES (Continued)

- g. Review of unit operations to detect potential hazards to nuclear safety.
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant Manager or the Safety Review Committee.
- i. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Safety Review Committee.
- j. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the Safety Review Committee.
- k. Review and documentation of judgment concerning prolonged operation in bypass, channel trip, and/or repair of defective protection channels of process variables placed in bypass since the last PORC meeting.
- l. Review of proposed modifications to the CPC addressable constants based on information obtained through the Plant Computer-CPC data link.
- m. Review of any accidental, unplanned or uncontrolled radioactive release including reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President-Nuclear and to the Safety Review Committee.
- n. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL, and major changes to radwaste treatment systems.

### AUTHORITY

#### 6.5.1.7 The PORC shall:

- a. Recommend in writing to the Plant Manager, prior to implementation except as provided in Specification 6.8.3, approval or disapproval of items considered under Specification 6.5.1.6a. through d. and l.
- b. Render determinations in writing, prior to implementation except as provided in Specification 6.8.3, with regard to whether or not each item considered under Specification 6.5.1.6a. through e. constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Vice President-Nuclear and the Safety Review Committee of disagreements between the PORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

## ADMINISTRATIVE CONTROLS

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### RECORDS

6.5.1.8 The PORC shall maintain written minutes of each PORC meeting that, at a minimum, document the results of all PORC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Vice President-Nuclear and the Safety Review Committee.

### 6.5.2 SAFETY REVIEW COMMITTEE (SRC)

#### FUNCTION

6.5.2.1 The SRC shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering and
- h. Quality assurance practices.

#### COMPOSITION

6.5.2.2 The SRC shall be composed of at least five members, including the Chairman. Members of the SRC may be from within the LP&L organization or from organizations external to LP&L.

The qualifications of members selected for the SRC shall be in accordance with Section 4.7 of ANSI/ANS 3.1-1978.

#### ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the SRC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SRC activities at any one time.

#### CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the SRC Chairman to provide expert advice to the SRC.

## ADMINISTRATIVE CONTROLS

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### MEETING FREQUENCY

6.5.2.5 The SRC shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

### QUORUM

6.5.2.6 The quorum of the SRC necessary for the performance of the review and audit function of these technical specifications shall consist of a minimum of five members or of not less than a majority of the composition of members in Specification 6.5.2.2, whichever is greater. No more than a minority of the members shall have line responsibility for operation of the plant.

### REVIEW

6.5.2.7 The SRC shall be responsible for the review of:

- a. The safety evaluations for (1) changes to procedures, equipment, or systems; and (2) tests or experiments completed under the provision of 10 CFR 50.59, to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
- d. Proposed changes to Technical Specifications or this Operating License;
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the PORC.

## ADMINISTRATIVE CONTROLS

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### AUDITS

- 6.5.2.8 Audits of unit activities shall be performed under the cognizance of the SRC. These audits shall encompass:
- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
  - b. The performance, training, and qualifications of the entire unit staff at least once per 12 months.
  - c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety at least once per 6 months.
  - d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months.
  - e. Any other area of unit operation considered appropriate by the SRC or the Senior Vice President-Nuclear Operations.
  - f. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel.
  - g. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least every third year.
  - h. The Primary Coolant Sources Outside Containment Program at least once per 24 months.
  - i. The In-Plant Radiation Monitoring Program at least once per 24 months.
  - j. The Secondary Water Chemistry Program at least once per 24 months.
  - k. The Post-Accident Sampling Program at least once per 24 months.
  - l. The Basemat Monitoring Program at least once per 24 months.
  - m. The radiological environmental monitoring program and the results thereof at least once per 12 months.
  - n. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
  - o. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.

## ADMINISTRATIVE CONTROLS

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### AUDITS (Continued)

- p. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 at least once per 12 months.

### AUTHORITY

6.5.2.9 The SRC shall report to and advise the Senior Vice President- Nuclear Operations on those areas of responsibility specified in Specifications 6.5.2.7 and 6.5.2.8.

### RECORDS

6.5.2.10 Records of SRC activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each SRC meeting shall be prepared, approved, and forwarded to the Senior Vice President-Nuclear Operations within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the Senior Vice President-Nuclear Operations within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Senior Vice President-Nuclear Operations and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

### 6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the PORC and the results of this review shall be submitted to the SRC and the Vice President-Nuclear.

### 6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

## ADMINISTRATIVE CONTROLS

### SAFETY LIMIT VIOLATION (Continued)

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Senior Vice President-Nuclear Operations and the SRC shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the SRC and the Senior Vice President-Nuclear Operations within 14 days of the violation.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

### 6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 and those required for implementing the requirements of NUREG-0737.
- b. Refueling operations.
- c. Surveillance and test activities of safety-related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. Modification of Core Protection Calculator (CPC) Addressable Constants, including independent verification of modified constants.

#### NOTES:

- (1) Modification to the CPC addressable constants based on information obtained through the Plant Computer - CPC data link shall not be made without prior approval of the PORC.
- (2) Modifications to the CPC software (including algorithm changes and changes in fuel cycle specific data) shall be performed in accordance with the most recent version of CEN-39(A)-P, "CPC Protection Algorithm Software Change Procedure," that has been determined to be applicable to the facility. Additions or deletions to CPC Addressable Constants or changes to Addressable Constant software limits values shall not be implemented without prior NRC approval.
  - h. Administrative procedures implementing the overtime guidelines of Specification 6.2.2f., including provisions for documentation of deviations.
  - i. PROCESS CONTROL PROGRAM implementation.

REACTIVITY CONTROL SYSTEMS

BASES

MOVABLE CONTROL ASSEMBLIES (Continued)

continued operations when the positions of CEAs with inoperable position indicators can be verified by the "Full In" or "Full Out" limits.

CEA positions and OPERABILITY of the CEA position indicators are required to be verified on a nominal basis of once per 12 hours with more frequent verifications required if an automatic monitoring channel is inoperable. These verification frequencies are adequate for assuring that the applicable LCO's are satisfied.

The maximum CEA drop time restriction is consistent with the assumed CEA drop time used in the safety analyses. Measurement with  $T_{avg}$  greater than or equal to 520°F and with all reactor coolant pumps operating ensures that the measured drop times will be representative of insertion times experienced during a reactor trip at operating conditions.

The establishment of LSSS and LCOs requires that the expected long and short-term behavior of the radial peaking factors be determined. The long term behavior relates to the variation of the steady-state radial peaking factors with core burnup and is affected by the amount of CEA insertion assumed, the portion of a burnup cycle over which such insertion is assumed, and the expected power level variation throughout the cycle. The short term behavior relates to transient perturbations to the steady-state radial peaks due to radial xenon redistribution. The magnitudes of such perturbations depend upon the expected use of the CEAs during anticipated power reductions and load maneuvering. Analyses are performed based on the expected mode of operation of the NSSS (base loaded, or load maneuvering) and from these analyses CEA insertions are determined and a consistent set of radial peaking factors defined. The Long Term Steady State and Short Term Insertion Limits are determined based upon the assumed mode of operation used in the analyses and provide a means of preserving the assumptions on CEA insertions used. The limits specified serve to limit the behavior of the radial peaking factors within the bounds determined from analysis. The actions specified serve to limit the extent of radial xenon redistribution effects to those accommodated in the analyses. The Long and Short Term Insertion Limits of Specification 3.1.3.6 are specified for the plant which has been designed for primarily base loaded operation but which has the ability to accommodate a limited amount of load maneuvering.

The Transient Insertion Limits of Specification 3.1.3.6 and the Shutdown CEA Insertion Limits of Specification 3.1.3.5 ensure that (1) the minimum SHUT-DOWN MARGIN is maintained, and (2) the potential effects of a CEA ejection accident are limited to acceptable levels. Long-term operation at the Transient Insertion Limits is not permitted since such operation could have effects on the core power distribution which could invalidate assumptions used to determine the behavior of the radial peaking factors. Insertion of Reg. Groups 5 and 6 is permitted to be essentially tip-to-tip within the limits imposed by the Transient Insertion Limit Line. This method of insertion is protected from sequence errors by the Core Protection Calculators.

The Part Length CEA Insertion Limits of Specification 3.1.3.7 ensure that adverse power shapes and rapid local power changes which affect radial peaking factors and DNB considerations do not occur as a result of a part-length CEA group covering the same axial segment of the fuel assemblies for an extended period of time during operation.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. 18 TO FACILITY OPERATING LICENSE NO. NPF-38  
LOUISIANA POWER AND LIGHT COMPANY  
WATERFORD STEAM ELECTRIC STATION, UNIT 3  
DOCKET NO. 50-382

1.0 INTRODUCTION

By application dated October 15, 1986, as supplemented by letters dated November 19, 1986, and February 9, 1987, Louisiana Power and Light Company (LP&L or the licensee) requested changes to the Technical Specifications (Appendix A to Facility Operating License No. NPF-38) for the Waterford Steam Electric Station, Unit 3. The proposed changes would update the organizational charts in Section 6 to reflect the reorganization within LP&L's Nuclear Operations group and other minor organizational changes that are administrative in nature and complement the changes to the organizational charts.

2.0 DISCUSSION

Figures 6.2-1 and 6.2-2 of the Technical Specification for Waterford 3 provide the offsite and onsite organizational structure for the Waterford plant. In its application dated October 15, 1986, as supplemented, LP&L proposed the following changes to the figures:

2.1 Figure 6.2-1 - Management Organization Chart

LP&L has revised the organization under the Senior Vice President-Nuclear Operations. These changes include the following:

- a) The new position of Vice President - Nuclear, who reports directly to the Senior Vice President Nuclear Operations, has been created. Reporting to the Vice President - Nuclear is the Nuclear Operations Engineering Manager, the Nuclear Operations Construction Manager, the Nuclear Operations Plant Manager, the Nuclear Operations Training Manager, and the Nuclear Operations Support and Assessments Manager.
- b) The position of Project Manager, who previously reported to the Senior Vice President-Nuclear Operations, has been deleted. The functional responsibilities of the Project Manager have been redesignated principally to the Nuclear Operations Engineering Manager and Nuclear Operations Construction Manager.

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- c) The new position of Nuclear Operations Support and Assessment Manager, who reports to the Vice President-Nuclear, was created.

## 2.2 Figure 6.2-2 - Plant Operations Organization

LP&L has revised the plant operations organization for Waterford 3. The changes include the following:

- a) The STA supervisor, who previously reported to the Operations and Maintenance Assistant Plant Manager, now reports to the Operations Superintendent-Nuclear.
- b) The Plant Quality Group, which previously reported to the Plant Manager - Nuclear, has been consolidated with other Quality Assurance functions and now reports to the Quality Assurance Manager, who reports directly to the Senior Vice President-Nuclear Operations as shown in Figure 6.2-1.
- c) Two new functional areas, namely, Fire Protection Safety and Event Analysis and Reporting, have been established and report to the Technical Services Assistant Plant Manager.
- d) The Planning and Scheduling Supervisor who previously reported to the Assistant Plant Manager-Nuclear now reports directly to the Plant Manager-Nuclear.

- 2.3 There are miscellaneous changes, including title changes, throughout Section 6 to reflect the reorganization and editorial changes. The staff has reviewed these changes and finds them acceptable since they are purely administrative changes to reflect the new organization and to make editorial changes.

## 3.0 EVALUATION

The staff has reviewed the changes to Figures 6.2-1 and 6.2-2 and has determined that they will enhance the effectiveness of the Senior Vice President-Nuclear Operations in that by delegating some of his responsibilities to the Vice President-Nuclear, his attention can be focused on activities related to important safety issues. In addition, the proposed plant operations organization still maintains clear lines of authority, through the Vice President-Nuclear to the Senior Vice President Nuclear Operations and responsibility for activities important to the safe operations of Waterford 3. The changes are therefore acceptable to the staff.

The proposed changes have no effect on the assumptions contained in the safety analyses. Moreover, the technical specifications which preserve the safety analysis assumptions are likewise unaffected by the proposed changes. Therefore, the proposed changes will not result in any increase in the probability or consequences of any accident previously analyzed because overall management commitments and capabilities are not reduced.

The proposed changes are administrative in nature and will not create the possibility of a new or different kind of accident from any accident previously evaluated because no organizational responsibilities are being eliminated.

The Waterford 3 safety margins are defined and maintained by the Technical Specifications in Section 2-5 which are unaffected by the proposed changes. Therefore, the proposed changes will not involve any reduction in a safety margin because organizational control and accountability will be enhanced by these controls.

#### 4.0 CONTACT WITH STATE OFFICIAL

The NRC staff has advised the Administrator, Nuclear Energy Division, Office of Environmental Affairs, State of Louisiana of the proposed determination of no significant hazards consideration. No comments were received.

#### 5.0 ENVIRONMENTAL CONSIDERATION

This 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 this amendment.

#### 6.0 CONCLUSION

Based upon our evaluation of the proposed changes to the Waterford 3 Technical Specifications, we have concluded that: there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. We, therefore, conclude that the proposed changes are acceptable, and are hereby incorporated into the Waterford 3 Technical Specifications.

Dated: April 3, 1987

Principal Contributor: F. Allenspach