

November 4, 1994

Mr. Ross P. Barkhurst  
Vice President Operations  
Entergy Operations, Inc.  
Post Office Box B  
Killona, Louisiana 70066

SUBJECT: ISSUANCE OF AMENDMENT NO. 100 TO FACILITY OPERATING LICENSE  
NPF-38 - WATERFORD STEAM ELECTRIC STATION, UNIT 3 (TAC NO. M85970)

Dear Mr. Barkhurst:

The Commission has issued the enclosed Amendment No. 100 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 February 5, 1993, as supplemented by letter dated August 1, 1994.

The amendment changes the Appendix A Technical Specifications to incorporate a technical review and control process to supplement the onsite technical review and approval of new procedures and changes thereto affecting nuclear safety.

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

Sincerely,

ORIGINAL SIGNED BY:

Chandu P. Patel, Project Manager  
Project Directorate IV-1  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosures: 1. Amendment No. 100 to NPF-38  
2. Safety Evaluation

cc w/encls: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Entergy Operations, Inc.  
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*Chandu P. Patel*

Chandu P. Patel, Project Manager  
Project Directorate IV-1  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Docket No. 50-382

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2. Safety Evaluation

cc w/encls: See next page

Mr. Ross P. Barkhurst  
Entergy Operations, Inc.

Waterford 3

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

ENERGY OPERATIONS, INC.

DOCKET NO. 50-382

WATERFORD STEAM ELECTRIC STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 100  
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 February 5, 1993, as supplemented by letter dated August 1, 1994, 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.

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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. 100, 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.

FOR THE NUCLEAR REGULATORY COMMISSION

*Chandu P. Patel*

Chandu P. Patel, Project Manager  
Project Directorate IV-1  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: **November 4, 1994**

ATTACHMENT TO LICENSE AMENDMENT NO. 100  
TO FACILITY OPERATING LICENSE NO. NPF-38  
DOCKET NO. 50-382

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE PAGES

6-8  
6-9  
6-13  
-  
6-14  
6-15

INSERT PAGES

6-8  
6-9  
6-13  
6-13a  
6-14  
6-15

## 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 10 CFR Part 55.
- 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 10 CFR Part 55.

### 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 General Manager Plant Operations on all matters related to nuclear safety.

##### COMPOSITION

6.5.1.2 The PORC shall be composed of the following members:

Manager Technical Services  
Manager Operations and Maintenance  
Management Knowledgeable in Engineering\*  
Maintenance Superintendent  
Operations Superintendent  
Radiation Protection Superintendent  
Management Knowledgeable in Quality Assurance/Control

Either the Manager Technical Services or the Manager Operations and Maintenance will be Chairman.

\*Management knowledgeable in engineering is one of the following: STA Supervisor, Systems Engineering Electric/HVAC Supervisor, Systems Engineering Mechanical Supervisor or Reactor Engineering and Performance Supervisor.

## ADMINISTRATIVE CONTROLS

### ALTERNATES

6.5.1.3 In the absence of the PORC Chairman, the General Manager Plant Operations 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:

- a. Review of (1) all plant administrative procedures required by Specification 6.8 and changes thereto, (2) all programs required by Specification 6.8 and changes thereto, (3) changes to the Waterford 3 Emergency Operating Procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33, and (4) any other proposed procedures or changes thereto as determined by the General Manager Plant Operations.
- 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 General Manager Plant Operations and to the Safety Review Committee.
- f. Review of all REPORTABLE EVENTS.



## ADMINISTRATIVE CONTRC

### 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 General Manager Plant Operations or the Safety Review Committee.
- i. Review of the Security Plan and submittal of recommended changes to the Safety Review Committee.
- j. Review of the Emergency Plan and submittal of recommended changes to the Safety Review Committee.
- k. Review and documentation of judgement 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 Operations 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.
- o. Review of the Fire Protection Program and submittal of recommended changes to the Safety Review Committee.
- p. Review of proposed procedures and changes to procedures which involve an unreviewed safety question as defined in 10CFR50.59.

### AUTHORITY

#### 6.5.1.7 The PORC shall:

- a. Recommend in writing to the General Manager Plant Operations, 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 Operations and the Safety Review Committee of disagreements between the PORC and the General Manager Plant Operations; however, the General Manager Plant Operations 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 Operations 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

### 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 Vice President 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 Vice President 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 Vice President Operations within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Vice President Operations and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

### TECHNICAL REVIEW AND CONTROL PROCESS

6.5.3 Procedures required by Specification 6.8.1 and other procedures which affect nuclear safety, as determined by the General Manager Plant Operations, and changes thereto, shall be reviewed as follows:

- a. Each procedure or change shall be independently reviewed by a qualified individual knowledgeable in the area affected other than the individual who prepared the procedure or procedure change. This review shall include a determination of whether or not additional cross-disciplinary reviews are necessary. If deemed necessary, the reviews shall be performed by the review personnel of the appropriate discipline(s).
- b. Individuals performing these reviews shall meet the applicable qualifications of ANSI/ANS 3.1-1978, Section 4.0, excluding subsections 4.5.2 and 4.5.3, and be approved to perform these reviews in a given area by the General Manager Plant Operations.

## ADMINISTRATIVE CONTROLS

### TECHNICAL REVIEW AND CONTROL PROCESS (Continued)

- c. Those procedures and programs specified by Specification 6.5.1.6, and changes in intent thereto, shall be reviewed by PORC and approved by the General Manager Plant Operations prior to implementation.
- d. Those procedures and programs specified by Specification 6.8.1, and changes in intent thereto, with the exception of those specified in Specification 6.5.1.6, shall be approved by the appropriate Group Head as specified in station administrative procedures.
- e. Review of the procedure or procedure change will include a determination of whether or not an unreviewed safety question is involved. This determination will be based on the review of a written safety evaluation prepared by a qualified individual, or documentation that a safety evaluation is not required. PORC review, SRC review, and NRC approval of items involving unreviewed safety questions shall be obtained prior to station approval for implementation.
- f. Written records of reviews performed in accordance with this specification shall be prepared and maintained in accordance with Specification 6.10.

### 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 Operations.

### 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 Vice President 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 Vice President 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 Emergency Operating Procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33.
- 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 6.2.2e., including provisions for documentation of deviations.
- i. PROCESS CONTROL PROGRAM implementation.

## ADMINISTRATIVE CONTROLS

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### 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 Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed and approved as required by Specification 6.5 prior to implementation and reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator license on the unit affected;
- c. The change is documented, reviewed and approved as required by Specification 6.5, within 14 days of implementation.

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. 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:

## 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

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines 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.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 100 TO

FACILITY OPERATING LICENSE NO. NPF-38

ENERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION

Energy Operations, Inc., by letter dated February 5, 1993, requested changes to the Administrative Controls Section of the Technical Specifications for the Waterford Steam Electric Station, Unit 3. The proposed changes include a Technical Review and Control Process which modifies the scope of procedures required to be reviewed by the Plant Operation Review Committee (PORC) and approved by the General Manager Plant Operations. The changes would delete the PORC responsibility for the review of procedures required by Specification 6.8 and changes there to, except for administrative procedures and Emergency Operating Procedures to implement the requirement of NUREG 0737, Supplement 1. The PORC would retain responsibility for the review of proposed procedures and changes to procedures which involve an unreviewed safety question as defined in 10 CFR 50.59. The responsibility for the review of procedures deleted from PORC review responsibility will be incorporated into a new Technical Review and Control Process that will provide for the review of these procedures by qualified reviewers and their approval by an appropriate Group Head as described in new Specification 6.5.3.

By letter dated August 1, 1994, the licensee modified the February 5, 1993, proposed changes by excluding references to Section 4.5.2 and 4.5.3 of ANSI/ANS 3.1-1978. This change was noticed in the Federal Register on August 31, 1994 (59 FR 45022).

2.0 EVALUATION

The proposed new Section 6.5.3 provides for 1) procedural reviews through the use of qualified technical review personnel approved by the General Manager Plant Operations and 2) procedural approval through the use of group heads specified by administrative procedures. The qualified technical reviewers will be individuals other than the preparer who will document and implement



necessary cross-discipline reviews prior to approval. The administrative procedures to control the review process are under development and will be reviewed by the PORC and approved by the General Plant Manager Operations.

The specific changes proposed by the licensee will result in procedures and changes thereto being reviewed and approved at a level commensurate with their importance to safety. The cross discipline review of procedure changes will continue to be performed. The PORC will continue to review the Security Plan, the Emergency Plan, and the Fire Protection Plan. The implementing procedures for all these programs will be reviewed by the new Technical Review and Control Process. In keeping with the intent of the safety level of the review process, the PORC will review proposed procedures and changes which involve an unreviewed safety question as defined in 10 CFR 50.59. This new section is proposed as item p. under technical specification 6.5.1.6. The PORC will also review all plant administrative procedures, other programs and changes thereto required by section 6.8, changes to the Emergency Operation Procedures required to implement requirements of NUREG 0737 and Supplement 1, and other procedures and changes as determined by the General Plant Manager Operations. The staff has reviewed these changes and find that the Technical Review and Control Process is sufficiently defined, and continues to provide an independent review and approval of those procedures required by Specification 6.8 by qualified individuals knowledgeable in affected procedures.

The changes to the technical specifications as proposed by the licensee and the proposed qualifications of the reviewers were reviewed by the staff and found acceptable with one clarification. The licensee adopted the reviewer qualification as described in ANSI/ANS 3.1-1978, Selection and Training Nuclear Power Plant Personnel. The staff noted that this standard included the provisions for technicians and repairmen and their selection as qualified reviewers was questionable. In discussions on this qualification issue, the licensee stated that the inclusion of repairmen and technicians was an oversight and it was not their intent or desire to assign reviewer responsibilities at this level. To clarify the proposed technical specification, the licensee submitted a revision to their request by letter dated August 1, 1994, to exclude Sections 4.5.2 and 4.5.3 of ANSI/ANS 3.1-1978. This exclusion will be incorporated into the new technical specification section 6.5.3 b. With this change, the proposed technical specifications properly reflect the program changes and meet the appropriate acceptance criteria of Section 13.4 of NUREG 0800, the Standard Review Plan.

### 3.0 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.

#### 4.0 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.

#### 5.0 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 Contributors: F. Allenspach  
D. Wigginton

Date: November 4, 1994