

April 15, 1997

Mr. C. Charles M. Dugger
Vice President Operations
Entergy Operations, Inc.
P. O. Box B
Killona, LA 70066

SUBJECT: NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENT TO FACILITY
OPERATING LICENSE, PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION
DETERMINATION AND OPPORTUNITY FOR HEARING - WATERFORD STEAM
ELECTRIC STATION, UNIT 3 (TAC NO. M98366)

Dear Mr. Dugger:

Enclosed is a copy of the subject notice that relates to your application for
amendment dated April 11, 1997. The proposed amendment would change Technical
Specification 3.7.1.3, Action (b) and is associated surveillance requirement
for Waterford 3.

The notice has been forwarded to the Office of the Federal Register for
publication.

Sincerely,

Orig. 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

Enclosure: Notice

cc w/encl: See next page

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

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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

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cc w/encl: See next page

Mr. Charles M. Dugger
Entergy Operations, Inc.

Waterford 3

cc:

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Washington, DC 20005-3502

UNITED STATES NUCLEAR REGULATORY COMMISSIONENERGY OPERATIONS, INC.DOCKET NO. 50-382NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENT TO
FACILITY OPERATING LICENSE, PROPOSED NO SIGNIFICANT HAZARDS
CONSIDERATION DETERMINATION, AND OPPORTUNITY FOR A HEARING

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to Facility Operating License No. NPF-38 issued to Entergy Operations, Inc., (the licensee) for operation of the Waterford Steam Electric Station, Unit 3, located in St. Charles Parish, Louisiana.

The proposed amendment would change Waterford 3 Technical Specifications by deleting Technical Specification (TS) 3.7.1.3, Action (b) and its associated surveillance requirement. The current TS 3.7.1.3 limiting condition for operation (LCO) allows credit for an alternate supply for emergency feedwater (EFW) in the event the condensate storage pool (CSP) is unavailable as the primary source. Surveillance 4.7.1.3.2 is being deleted since use of the Wet Cooling Tower (WCT) basins as the backup supply as described in the current Action (b) will no longer be allowed.

Before issuance of the proposed license amendment, the Commission will have made findings required by the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations.

The Commission has made a proposed determination that the amendment request involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92, this means that operation of the facility in accordance with the proposed amendment would not (1) involve a significant

increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

As previously identified, the accidents for which the combined water inventory of the CSP and WCT basin is needed are tornado and natural circulation events. The combined inventory is also required during post-LOCA long term cooling until shutdown cooling is entered. CSP level is not a failure mode for any of these events. The contents of the CSP and one WCT basin are sufficient to meet plant needs for accident mitigation in each of these scenarios. Deletion of TS 3.7.1.3 Action (b) and the associated surveillance do not affect the volume of either the CSP or the WCT basin and will not affect the consequences of the accidents for which the CSP and a WCT basin are needed.

In addition, all accident analyses assume that EFW is initially aligned to the CSP. No credit is taken for an initial alignment to the WCT basins. Thus removal of this action will not impact any analysis.

As previously discussed, a catastrophic failure of the CSP concurrent with an EFW system demand is not a credible scenario. As a conservative measure, Waterford 3 has elected to incorporate administrative controls in its off-normal procedures to address this scenario.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different type of accident from any accident previously evaluated?

Response: No

The CSP is used almost exclusively as the water supply for EFW. The only exceptions are its use as a makeup source for the CCW system, Emergency Diesel Generator Jacket Cooling Water System,

Fuel Pool and Purification System, and Essential Chilled Water, which place a minimal demand on the pool. The possible failure modes that could keep the CSP from fulfilling its intended safety function as the only dedicated source of EFW are tank vent clogging, low tank level, and pump suction flashing.

The CSP is equipped with an 8 in. vent line which penetrates the pool ceiling and terminates in the above room six feet above the floor. There is no isolation valve on the line, and there are no known sources of debris in the area which could clog such a large diameter pipe. Also, the pipe ends with a "U"-bend, with the open end turned downwards. Accidental crimping of the thick walled pipe is not considered credible since the pipe is not within the travel path of any cranes, and is located in a congested area behind an instrument cabinet, out of the path of any fork lifts.

The CSP is equipped with redundant, safety grade level indicators and TS 3.7.1.3 requires operators to verify tank level is within allowable limits every 12 hours.

In addition, the CSP water remains at Reactor Auxiliary Building (RAB) ambient temperatures, usually below 90°. There are no lines from hot, interfacing systems which connect to the lines between the CSP and pump suction.

Therefore, the probability of these failure modes will not increase by the deletion of TS 3.7.1.3, Action (b). As such, it is not considered credible that tank level would be out of limits when a system demand occurred. Also, no new system connections or interactions are created by this change. Deletion of this TS action statement does not create a new or different accident with regard to the CSP.

An Emergency Feedwater Actuation Signal (EFAS) is initiated upon either a low steam generator level coincident with no low steam generator pressure or a low steam generator level coincident with high steam generator differential pressure to feed the steam generator with the highest pressure. CSP level does not affect initiation of an EFAS, therefore this proposed change does not create a new or different EFAS initiator.

Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed change will preserve the margin of safety. The CSP is unaffected by this change and will continue to perform its intended safety function as the water supply for EFW. The combined volumes of the CSP and one WCT basin are still available to perform their accident mitigation function. If the action statement for TS 3.7.1.3 is entered, the plant will have 4 hours to restore the CSP to an operable condition or begin to shutdown.

The WCT basins will continue to perform their intended safety function as the ultimate heat sink and the quantity of water available for that purpose is unaffected by this change. The WCT basins will still be available as an additional source for EFW during accident conditions; however, they will not be lined up as the primary source of EFW when the CSP is inoperable and they will not be credited to extend the allowed outage time for the CSP when the CSP is inoperable.

Therefore, the proposed change will not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

The Commission is seeking public comments on this proposed determination. Any comments received within 30 days after the date of publication of this notice will be considered in making any final determination.

Normally, the Commission will not issue the amendment until the expiration of the 30-day notice period. However, should circumstances change during the notice period such that failure to act in a timely way would result, for example, in derating or shutdown of the facility, the Commission may issue the license amendment before the expiration of the 30-day notice period, provided that its final determination is that the amendment involves

no significant hazards consideration. The final determination will consider all public and State comments received. Should the Commission take this action, it will publish in the FEDERAL REGISTER a notice of issuance and provide for opportunity for a hearing after issuance. The Commission expects that the need to take this action will occur very infrequently.

Written comments may be submitted by mail to the Chief, Rules Review and Directives Branch, Division of Freedom of Information and Publications Services, Office of Administration, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and should cite the publication date and page number of this FEDERAL REGISTER notice. Written comments may also be delivered to Room 6D22, Two White Flint North, 11545 Rockville Pike, Rockville, Maryland, from 7:30 a.m. to 4:15 p.m. Federal workdays. Copies of written comments received may be examined at the NRC Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC.

The filing of requests for hearing and petitions for leave to intervene is discussed below.

By May 22, 1997, the licensee may file a request for a hearing with respect to issuance of the amendment to the subject facility operating license and any person whose interest may be affected by this proceeding and who wishes to participate as a party in the proceeding must file a written request for a hearing and a petition for leave to intervene. Requests for a hearing and a petition for leave to intervene shall be filed in accordance with the Commission's "Rules of Practice for Domestic Licensing Proceedings" in 10 CFR Part 2. Interested persons should consult a current copy of 10 CFR 2.714

which is available at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC, and at the local public document room located at the University of New Orleans Library, Louisiana Collection, Lakefront, New Orleans, Louisiana 70122. If a request for a hearing or petition for leave to intervene is filed by the above date, the Commission or an Atomic Safety and Licensing Board, designated by the Commission or by the Chairman of the Atomic Safety and Licensing Board Panel, will rule on the request and/or petition; and the Secretary or the designated Atomic Safety and Licensing Board will issue a notice of hearing or an appropriate order.

As required by 10 CFR 2.714, a petition for leave to intervene shall set forth with particularity the interest of the petitioner in the proceeding, and how that interest may be affected by the results of the proceeding. The petition should specifically explain the reasons why intervention should be permitted with particular reference to the following factors: (1) the nature of the petitioner's right under the Act to be made party to the proceeding; (2) the nature and extent of the petitioner's property, financial, or other interest in the proceeding; and (3) the possible effect of any order which may be entered in the proceeding on the petitioner's interest. The petition should also identify the specific aspect(s) of the subject matter of the proceeding as to which petitioner wishes to intervene. Any person who has filed a petition for leave to intervene or who has been admitted as a party may amend the petition without requesting leave of the Board up to 15 days prior to the first prehearing conference scheduled in the proceeding, but such an amended petition must satisfy the specificity requirements described above.

Not later than 15 days prior to the first prehearing conference scheduled in the proceeding, a petitioner shall file a supplement to the petition to intervene which must include a list of the contentions which are sought to be litigated in the matter. Each contention must consist of a specific statement of the issue of law or fact to be raised or controverted. In addition, the petitioner shall provide a brief explanation of the bases of the contention and a concise statement of the alleged facts or expert opinion which support the contention and on which the petitioner intends to rely in proving the contention at the hearing. The petitioner must also provide references to those specific sources and documents of which the petitioner is aware and on which the petitioner intends to rely to establish those facts or expert opinion. Petitioner must provide sufficient information to show that a genuine dispute exists with the applicant on a material issue of law or fact. Contentions shall be limited to matters within the scope of the amendment under consideration. The contention must be one which, if proven, would entitle the petitioner to relief. A petitioner who fails to file such a supplement which satisfies these requirements with respect to at least one contention will not be permitted to participate as a party.

Those permitted to intervene become parties to the proceeding, subject to any limitations in the order granting leave to intervene, and have the opportunity to participate fully in the conduct of the hearing, including the opportunity to present evidence and cross-examine witnesses.

If a hearing is requested, the Commission will make a final determination on the issue of no significant hazards consideration. The final determination will serve to decide when the hearing is held.

If the final determination is that the amendment request involves no significant hazards consideration, the Commission may issue the amendment and make it immediately effective, notwithstanding the request for a hearing. Any hearing held would take place after issuance of the amendment.

If the final determination is that the amendment request involves a significant hazards consideration, any hearing held would take place before the issuance of any amendment.

A request for a hearing or a petition for leave to intervene must be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, Attention: Docketing and Services Branch, or may be delivered to the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC, by the above date. Where petitions are filed during the last 10 days of the notice period, it is requested that the petitioner promptly so inform the Commission by a toll-free telephone call to Western Union at 1-(800) 248-5100 (in Missouri 1-(800) 342-6700). The Western Union operator should be given Datagram Identification Number N1023 and the following message addressed to William D. Beckner: petitioner's name and telephone number, date petition was mailed, plant name, and publication date and page number of this FEDERAL REGISTER notice. A copy of the petition should also be sent to the Office of the General Counsel, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to Winston & Strawn, 1400 L Street, N.W. Washington, DC, attorney for the licensee.

Non-timely filings of petitions for leave to intervene, amended petitions, supplemental petitions and/or requests for hearing will not be

entertained absent a determination by the Commission, the presiding officer or the presiding Atomic Safety and Licensing Board that the petition and/or request should be granted based upon a balancing of the factors specified in 10 CFR 2.714(a)(1)(i)-(v) and 2.714(d).

For further details with respect to this action, see the application for amendment dated April 11, 1997, which is available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC, and at the local public document room located at the University of New Orleans Library, Louisiana Collection, Lakefront, New Orleans, LA 70122.

Dated at Rockville, Maryland, this 15th day of April, 1997.

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