

June 16, 1999

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

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - ISSUANCE OF
AMENDMENT RE: REMOVAL OF CERTAIN ADMINISTRATIVE CONTROLS
FROM THE TECHNICAL SPECIFICATIONS (TAC NO. MA4671)

Dear Mr. Dugger:

The Commission has issued the enclosed Amendment No. 152 to Facility Operating License No. NPF-38 for the Waterford Steam Electric Station, Unit 3 (Waterford 3). The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated January 25, 1999, as supplemented by letter dated April 16, 1999.

The amendment removes certain administrative controls from the Waterford 3 Technical Specifications and instead relies on the requirements of the new common "Entergy Quality Assurance Program Manual" and the change controls of Title 10 of the Code of Federal Regulations, Section 50.54(a).

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

Sincerely,
ORIGINAL SIGNED BY
Chandu P. Patel, Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosures: 1. Amendment No. 152 to NPF-38
2. Safety Evaluation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

June 16, 1999

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Sincerely,

Chandu P. Patel

Chandu P. Patel, Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-382

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2. Safety Evaluation

cc w/encls: See next page

Waterford Generating Station 3

cc:

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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. 152
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 January 25, 1999, as supplemented by letter dated April 16, 1999, 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. 152, 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 and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Gramm, Chief, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: June 16, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 152

TO FACILITY OPERATING LICENSE NO. NPF-38

DOCKET NO. 50-382

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

6-1
6-13
6-14
6-24

Insert

6-1
6-13
6-14
6-24

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

The General Manager Plant Operations or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that may affect nuclear safety.

6.1.2 The Shift Superintendent, 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 Operations, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR.
- b. The General Manager Plant Operations shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President Operations shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 UNIT STAFF

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;

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

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. 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, 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. Not used.
- e. Not used.
- 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

PROCESS CONTROL PROGRAM (Continued)

2. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after the approval of the General Manager Plant Operations.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 The ODCM shall be approved by the Commission prior to implementation.

6.14.2 Licensee-initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3p. This document shall contain:
 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 2. A determination that the change will maintain the level of radioactive effluent control required pursuant to 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose or setpoint calculations.
- b. Shall become effective after the approval of the General Manager Plant Operations.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

6.15 CONTAINMENT LEAKAGE RATE TESTING PROGRAM

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_s , is 44 psig.

The maximum allowable containment leakage rate, L_s , is 0.5% of containment air weight per day at P_s .



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 152 TO

FACILITY OPERATING LICENSE NO. NPF-38

ENERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION

By application dated January 25, 1999, as supplemented by letter dated April 16, 1999, Entergy Operations, Inc. (the licensee), submitted a request for changes to the Waterford Steam Electric Station, Unit 3 (Waterford 3), Technical Specifications (TSs). The requested changes would remove certain administrative controls from the Waterford 3 Technical Specifications and would rely on the requirements of the new common "Entergy Quality Assurance Program Manual" (QAPM) and the change controls of Title 10 of the Code of Federal Regulations (10 CFR), Section 50.54(a). A conference call was held on April 7, 1999, to discuss the specific QAPM requirements that address the requested TS changes. As a result, additional information was provided from the licensee by letter dated April 16, 1999, that did not change the scope of the original application and expand the initial proposed no significant hazards consideration determination as published in the Federal Register notice.

Relocation of certain administrative control requirements from the TSs to the QAPM is consistent with the processes described in Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance."

2.0 DISCUSSION AND EVALUATION

2.1 Relocation of Administrative Control Technical Specification Requirements to the QAPM

2.1.1 Discussion

Section 182a of the Atomic Energy Act of 1954, as amended (the Act), requires applicants for nuclear power plant operating licenses to state the TSs to be included as part of the license. The Commission's regulatory requirements related to the content of the TSs are set forth in 10 CFR 50.36. That regulation requires that the TSs include items in five specific categories, one of which being administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TSs.

Addressing administrative controls, 10 CFR 50.36(c)(5) states that they "are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." The specific content of the administrative controls section of the TSs is, therefore, that information that the Commission deems essential for the safe operation of the facility that is not already adequately covered by other regulations. Accordingly, the staff has determined that certain requirements that are not specifically required under 50.36(c)(5) and which are not otherwise necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, can be removed from administrative controls. Therefore, some existing TS requirements may be relocated to more appropriate documents; in this case, the QAPM, and controlled by the applicable regulatory requirements of 10 CFR 50.54(a).

By letter dated December 12, 1995, the staff issued NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." AL 95-06 provided information regarding experiences involving the relocation of TS administrative controls related to quality assurance. In AL 95-06, the staff compared the content of typical TS administrative controls related to quality assurance requirements for those plants that have not converted to the improved Standard Technical Specifications (ISTS) with established staff positions and amendment requests. On the basis of this review, the staff provided several observations in order to assist those licensees considering amendment requests related to quality assurance requirements.

2.1.2 Evaluation

The licensee's January 25, 1999, submittal, as supplemented by letter dated April 16, 1999, proposed to add a more restrictive requirement to TS 6.1.1 and to remove certain review and approval requirements, which are addressed in the QAPM description. The licensee also submitted the relevant section of the QAPM, which was reviewed by the staff. AL 95-06 discusses the relocation of review and approval requirements related to reports and procedures that the staff finds acceptable. The specific changes are addressed as follows:

TS 6.1.1

The proposed revision will require the General Manager Plant Operations or his designee to approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety. This is a more restrictive addition and it is consistent with NUREG-1432, "Improved Standard Technical Specifications for Combustion Engineering Plants," Section 5.1.1. Therefore, this change is acceptable.

TS 6.6.1.b

TS 6.6.1.b will no longer require each Reportable Event to be reviewed by the Plant Operating Review Committee (PORC) and will not require that the results of this review be submitted to the Safety Review Committee (SRC) and Vice President Operations. The requirement to review Reportable Events is addressed in the QAPM. Table 1, "Regulatory Commitments," Section C.8, of the QAPM, requires that the on-site (PORC) and off-site (SRC) safety review committees review all Reportable Events (reports made in accordance with 10 CFR 50.73). ANSI N18.7, Section 4.3.4(4), is referenced. Therefore, the staff finds that the reportable event

review requirements are adequately addressed in the QAPM, and that the requirements may be removed from the TSs as discussed in AL 95-06.

TS 6.7.1.b

TS 6.7.1.b will no longer require Safety Limit Violation Reports to be reviewed by the PORC. This section will continue to describe the required content of the report. Safety Limit Violation Reports fall under the reporting requirements of 10 CFR 50.73. The requirement to review Reportable Events is addressed in the QAPM. Table 1, "Regulatory Commitments," Section C.8, of the QAPM requires the on-site (PORC) and off-site (SRC) safety review committees to review all Reportable Events (reports made in accordance with 10 CFR 50.73). ANSI N18.7, Section 4.3.4(4), is referenced. Therefore, the staff finds that the Safety Limit Violation Report review requirements are adequately addressed in the QAPM, and that the requirements may be removed from TSs as discussed in AL 95-06.

TS 6.7.1.c

TS 6.7.1.c will no longer require Safety Limit Violation Reports to be submitted to the SRC. Section 6.7.1.c will continue to require that the report be submitted to the Commission and the Vice President Operations. Safety Limit Violation Reports fall under the reporting requirements of 10 CFR 50.73. The requirement to review Reportable Events is addressed in the QAPM. Table 1, "Regulatory Commitments," Section C.8, of the QAPM, requires the on-site (PORC) and off-site (SRC) safety review committees to review all Reportable Events (reports made in accordance with 10 CFR 50.73). ANSI N18.7, Section 4.3.4(4), is referenced. Therefore, the staff finds that the Safety Limit Violation Report review requirements are adequately addressed in the QAPM, and that the requirements may be removed from the TSs as discussed in AL 95-06.

TS 6.13.2.b

TS 6.13.2.b will no longer require that licensee-initiated changes to the Process Control Program (PCP) be reviewed and accepted by the PORC prior to becoming effective. Section 6.13.2.b will continue to require approval by the General Manager Plant Operations. Table 1, "Regulatory Commitments," Section C.9, of the QAPM, requires the on-site (PORC) safety review committee to review new and revised station administrative procedures. The PCP procedure, RW-001-210, "Process Control Program," is designated as an administrative procedure and therefore requires PORC review. ANSI N18.7, Section 4.3.4(5), is referenced. Therefore, the staff finds that the PCP review requirements are adequately addressed in the QAPM, and that the requirements may be removed from the TSs as discussed in AL 95-06.

TS 6.14.2.b

TS 6.14.2.b will no longer require that licensee-initiated changes to the Offsite Dose Calculation Manual (ODCM) be reviewed and accepted by the PORC prior to becoming effective. Section 6.14.2.b will continue to require approval by the General Manager Plant Operations. Table 1, "Regulatory Commitments," Section C.9, of the QAPM, requires the on-site (PORC) safety review committee to review new and revised station administrative procedures. The ODCM procedure, UNT-005-014, "Offsite Dose Calculation Manual," is designated as an administrative procedure and therefore requires PORC review. ANSI N18.7, Section 4.3.4(5), is referenced.

Therefore, the staff finds that the ODCM review requirements are adequately addressed in the QAPM, and that the requirements may be removed from the TSs as discussed in AL 95-06.

3.0 SUMMARY

The administrative controls for review and approval are not required to be in the TSs under 10 CFR Section 50.36 or Section 182a of the Act, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to public health and safety. The staff finds that the requirements being removed from the TSs are adequately addressed in the QAPM. In addition, sufficient regulatory controls for these QAPM commitments exist under 10 CFR 50.54(a). Accordingly, the staff has concluded that these requirements may be removed from the TSs as requested.

4.0 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.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes 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.

6.0 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 Contributor: R. Smith

Date: June 16, 1999