

April 16, 2003

Mr. Joseph E. Venable
Vice President Operations
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - CORRECTION TO
ISSUANCE OF AMENDMENT RE: MISSED SURVEILLANCES (TAC NO.
MB6199)

Dear Mr. Venable:

The Commission issued Amendment No. 187 to Facility Operating License No. NPF-38 for the Waterford Steam Electric Station, Unit 3, on March 21, 2003. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated August 19, 2002, as supplemented by letter dated December 19, 2002. A copy of related Safety Evaluation (SE) was enclosed.

The amendment, among other revisions to the TSs, revised the current Surveillance Requirement (SR) 4.0.1 and SR 4.0.3 to be consistent with NUREG-1432, Revision 2, Improved Standard Technical Specifications wording for SR 3.0.1 and SR 3.0.3. However, the reference to the NUREG was given as 1431. Enclosed are corrected versions of the cover letter dated March 21, 2003, and pages 1 and 4 of the SE, with the corrections denoted by a vertical bar. Please discard the associated pages from the previous submittal and replace them with the enclosed pages.

If you have any questions, please call me at (301) 415-1480.

Sincerely,

/RA/

N. Kalyanam, Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure: As stated

cc w/encls: See next page

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March 21, 2003

Mr. Joseph E. Venable
Vice President Operations
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - ISSUANCE OF
AMENDMENT RE: MISSED SURVEILLANCES (TAC NO. MB6199)

Dear Mr. Venable:

The Commission has issued the enclosed Amendment No. 187 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 August 19, 2002, as supplemented by letter dated December 19, 2002.

The amendment revises the TSs by: (1) modifying the wording of the current Surveillance Requirement (SR) 4.0.1 and SR 4.0.3 to be consistent with NUREG-1432, Revision 2, Improved Standard Technical Specifications (ISTS) wording for SR 3.0.1 and SR 3.0.3; and (2) modifying the ISTS wording, adopted in Item (1), above, for SR 4.0.3 to extend the delay period, before entering a Limiting Condition for Operation, following a missed surveillance. The delay period is extended from the current limit of up to 24 hours "... when the allowable outage time limits of the ACTION requirements are less than 24 hours." to "...up to 24 hours or up to the limit of the specified surveillance interval, whichever is greater." In addition, the following requirement is added to SR 4.0.3: "A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed."

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 N. Kalyanam

N. Kalyanam, Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosures: 1. Amendment No. 187 to NPF-38
2. Safety Evaluation

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 187 TO

FACILITY OPERATING LICENSE NO. NPF-38

ENTERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION

By application dated August 19, 2002, as supplemented by letter dated December 19, 2002, Entergy Operations, Inc. (the licensee), submitted a request for changes to the Waterford Steam Electric Station, Unit 3 (Waterford), Technical Specifications (TSs). The proposed changes to the TSs would: (1) modify the wording of the current Surveillance Requirement (SR) 4.0.1 and SR 4.0.3 to be consistent with NUREG-1432, Revision 2, Improved Standard Technical Specifications (ISTS) wording for SR 3.0.1 and SR 3.0.3; and (2) modifying the ISTS wording, adopted in Item (1), above, for SR 4.0.3 to extend the delay period, before entering a Limiting Condition for Operation, following a missed surveillance. The delay period is extended from the current limit of up to 24 hours "... when the allowable outage time limits of the ACTION requirements are less than 24 hours." to "...up to 24 hours or up to the limit of the specified surveillance interval, whichever is greater." In addition, the following requirement would be added to SR 4.0.3: "A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed."

2.0 BACKGROUND

The licensee's proposal follows one of the industry's initiatives under the risk-informed TS program. The licensee's application references Technical Specification Task Force (TSTF)-358, Revision 6, which incorporates changes made to TSTF-358, Revision 5, made in response to a notice published in the *Federal Register* (FR) on June 14, 2001 (66 FR 32400), seeking public comment. The licensee stated in its application that it is proposing no variations or deviations from the TS changes in TSTF-358, Revision 6, or in the staff's model safety evaluation (SE) dated June 14, 2001, as modified by the comments and responses published in the FR on September 28, 2001 (66 FR 49714).

In a letter dated November 17, 1999, the Nuclear Energy Institute (NEI) TSTF proposed several changes to the improved Standard Technical Specifications (STS) (i.e., NUREGs-1430 through -1434) on behalf of the industry. One of the proposed changes, identified as TSTF-358, was a change to STS SR 3.0.3 regarding missed SRs. On February 14, 2000, the staff requested that the NEI TSTF modify TSTF-358 to address several questions and comments that the staff had during their initial review of the proposed change. On September 15, 2000, the NEI TSTF

The NRC staff has determined that the proposed change is applicable to all licensees. In Generic Letter 87-09, the staff concluded that the proposed modifications would result in improved TSs for all plants and no limitations were put on the applicability of the proposed changes. Because the basis for this proposed change is largely the same as for the change proposed in Generic Letter 87-09, the staff believes the same broad applicability is appropriate. In addition, every licensee is required to comply with the Maintenance Rule and, therefore, will have implemented programs to comply with 10 CFR 50.65(a)(4) to assess and manage risk associated with maintenance and other operational activities.

The Waterford TS are an older version of the current ISTS described in NUREG-1432, Revision 2. The requirements concerning missed surveillances, contained in the ISTS SR 3.0.3 are incorporated in Waterford SR 4.0.3.

3.0 EVALUATION

As noted above, the licensee has proposed modifying the wording of the current SR 4.0.1 and SR 4.0.3 to be consistent with NUREG-1432, Revision 2 wording for SR 3.0.1 and SR 3.0.3. These modifications involve no technical changes to the existing TSs, are administrative in nature, are required in order to adopt the proposed changes associated with TSTF-358, Revision 6, and are acceptable.

The proposed change to SR 4.0.3, as modified to be consistent with NUREG-1432, Revision 2 wording, would be further changed to allow a delay period from 24 hours up to the surveillance frequency, whichever is greater, to perform a missed surveillance prior to having to declare the LCO not met. The proposed change would also add a sentence to SR 4.0.3 that states, "A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed."

The proposed change will not allow equipment known to be inoperable to be considered operable until the missed surveillance is performed. If it is known that the missed surveillance could not be met, SR 4.0.1 would require that the LCO be declared not met and the appropriate condition(s) entered. In addition, the Bases for SR 4.0.3 state that use of the delay period established by SR 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals, but only for the performance of missed surveillances.

The modification would also include changes to the Bases for SR 4.0.3 that provide details on how to implement the new requirements. The Bases changes provide guidance for surveillance frequencies that are not based on time intervals but are based on specified unit conditions, operating situations, or requirements of regulations. In addition, the Bases changes state that the licensee is expected to perform any missed surveillance test at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance. The Bases also state that the risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants," dated May 2000, and that the missed surveillance should be treated as an emergent condition as discussed in Regulatory Guide 1.182. In addition, the Bases state that the degree of depth and rigor of the evaluation should

Waterford Generating Station 3

cc:

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