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W3F1-2005-0017

March 8, 2005

Alan J. Harris  
Director, Nuclear Safety Assurance  
Waterford 3

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

**SUBJECT:** Supplement to Amendment Request NPF-38-258  
To Modify Technical Specification (TS) 5.3.1, Fuel Assemblies and TS  
6.9.1.11.1, Core Operating Limits Report  
Waterford Steam Electric Station, Unit 3  
Docket No. 50-382  
License No. NPF-38

**REFERENCES:** 1. Waterford 3 letter to the NRC dated June 20, 2004, License  
Amendment Request to Modify Technical Specification (TS) 5.3.1,  
Fuel Assemblies and TS 6.9.1.11.1, Core Operating Limits Report  
(W3F1-2004-0036)

Dear Sir or Madam:

By letter (Reference 1), Entergy Operations, Inc. (Entergy) proposed a change to the Waterford Steam Electric Station, Unit 3 (Waterford 3) Technical Specifications (TSs) that in part included a request to delete the Index from the TSs.

On March 3, 2005, Entergy and members of your staff held a call to discuss the proposed deletion of the Index. As a result of the call, five questions were determined to need formal response. Entergy's response is contained in Attachment 1.

Entergy requests that the proposed changes to TS 5.3.1 and TS 6.9.11.1 continue to be processed to support the upcoming refueling outage and that the change to delete the Index be deferred, if required.

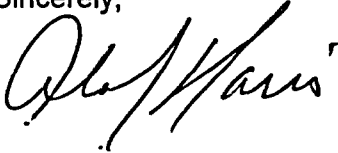
There are no technical changes proposed. The original no significant hazards consideration included in Reference 1 is not affected by any information contained in the supplemental letter. There are no new commitments contained in this letter.

If you have any questions or require additional information, please contact Dana Millar at 601-368-5445.

ADD1

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 8, 2005.

Sincerely,

A handwritten signature in black ink, appearing to read "AJH/DM/cbh", written in a cursive style.

AJH/DM/cbh

Attachment:

1. Response to Request for Additional Information

cc: Dr. Bruce S. Mallett  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011

NRC Senior Resident Inspector  
Waterford 3  
P.O. Box 822  
Killona, LA 70066-0751

U.S. Nuclear Regulatory Commission  
Attn: Mr. Nageswaran Kalyanam MS O-7D1  
Washington, DC 20555-0001

Wise, Carter, Child & Caraway  
Attn: J. Smith  
P.O. Box 651  
Jackson, MS 39205

Winston & Strawn  
Attn: N.S. Reynolds  
1400 L Street, NW  
Washington, DC 20005-3502

Louisiana Department of Environmental Quality  
Office of Environmental Compliance  
Surveillance Division  
P. O. Box 4312  
Baton Rouge, LA 70821-4312

American Nuclear Insurers  
Attn: Library  
Town Center Suite 300S  
29<sup>th</sup> S. Main Street  
West Hartford, CT 06107-2445

**Attachment 1**

**To**

**W3F1-2005-0017**

**Response to Request for Additional Information**

**Response to Request for Additional Information Related to License Amendment  
Request to Modify Technical Specification (TS) 5.3.1, Fuel Assemblies and TS  
6.9.1.11.1, Core Operating Limits Report**

**Question 1:**

The requested amendment is to delete the TS Index. The markup shows the Table of Contents (TOC) as deleted. Please clarify change request.

**Response 1:**

The markup shows the "Index" will be deleted. Waterford Steam Electric Station, Unit 3 (Waterford 3) does not have a heading labeled "Table of Contents" on the pages that were proposed for deletion; "Index" is the heading on these pages. Therefore, the proposed change is to delete the "Index."

The intent of the proposed change was to delete the Index and maintain it under a licensee controlled program such that changes could be made to the TS Index without NRC review and approval. The holders of copies of the TS will receive periodic updates of the TS Index pages. The Index update and distribution would be handled in a manner similar to the TS Bases update and distribution. The TS Bases Control Program is included in the Waterford 3 TS (TS 6.16).

**Question 2:**

Without a TOC, how will a user of the TS know where in the TS are the requirements that the user wants to read? How will this effect controlled copies in the control room and those distributed to plant personnel, resident inspectors and regional staff?

**Response 2:**

The user of the TS will continue to have an Index as outlined in the response to question 1. Periodic updates of the Index pages will be provided as outlined in response to question 1.

**Question 3:**

What will be the benefit to the licensee, NRC, and general public in removing the TS Table of Contents? Are there any license amendment precedents for eliminating TS TOCs? Does the NEI Writer's Guide specify guidance for including a TOC for technical specifications?

**Response 3:**

Removal of the TS Index from the 10 CFR 50.90 review process will eliminate unnecessary expenses and time related to the processing and handling of these administrative / non-

technical changes. The proposed change would be benefit neutral to the general public since they would continue to have access to an Index.

Entergy is not aware of any license amendment precedents for eliminating the TS Table of Contents or Index, however, when Grand Gulf and Arkansas Nuclear One, Unit 1 converted to the Improved Standard TSs, both were issued by the NRC without a Table of Contents. Both plants created and maintain a Table of Contents and periodically provide updated pages to the controlled copy holders.

The Improved Standard Technical Specification Writer's guide includes guidance on how to format the Table of Contents page. The Writer's guide refers to the Table of Contents as "Technical Specification Front Matter," which also includes the Title Page and List of Effective Pages. The Writer's guide describes the Technical Specification content as starting with Chapter 1, "Use and Application" and does not include the Table of Contents as part of the content of the TSs.

**Question 4:**

How would the licensee communicate to the NRC staff, Resident Inspectors, Regional staff and general public numbering changes made to TS sections in the event that the TOC is eliminated?

**Response 4:**

Please see the response to question 1. Additionally, any numbering changes made on any TS page in TS Sections 1 through 6 would require a license amendment request in accordance with 10 CFR 50.90 which would be distributed as previously described.

**Question 5:**

Did you consider only eliminating the page numbers and leaving the TOC of the TSs in place?

**Response 5:**

Entergy intended to maintain the pages with periodic updates and did not consider only eliminating the page numbers.