

December 16, 2005

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

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 (WATERFORD 3) -
REQUEST FOR ADDITIONAL INFORMATION RELATED TO PROPOSED
TECHNICAL SPECIFICATION CHANGE TO STEAM GENERATOR TUBE
INSERVICE INSPECTION PROGRAM USING CONSOLIDATED LINE ITEM
IMPROVEMENT PROCESS (TAC NO. MC7973)

Dear Mr. Venable:

By letter dated June 21, 2005, Entergy Operations, Inc. proposed revisions to the Waterford 3 Technical Specifications which would allow replacement of the existing steam generator tube surveillance program with that being proposed by the Technical Specification Task Force (TSTF) in TSTF 449, Revision 4.

After reviewing your request, the Nuclear Regulatory Commission staff has determined that additional information is required to complete the review. We discussed this information with your staff by telephone and they agreed to provide the additional information requested in the enclosure within 30 days of receipt of this letter.

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

Sincerely,

/RA/

Mel B. Fields, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure: Request for Additional Information

cc w/encl: See next page

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* RAI input from the staff without any major change

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REQUEST FOR ADDITIONAL INFORMATION

TECHNICAL SPECIFICATION CHANGE TO STEAM GENERATOR TUBE INSERVICE

INSPECTION USING CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

ENTERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1. The licensee's Insert 1 (TS 3/4.4.4), corresponding to Technical Specification (TS) Task Force (TSTF) Section 3.4.18, does not have the NOTE stating "Separate Condition entry is allowed for each SG [steam generator] tube." This is under the limiting condition for operation (LCO) for steam generator tube integrity. This note is required for the LCO to be used as intended and described in the TSTF. Please discuss your plans to modify the TS accordingly, or provide justification for omitting it.
2. In the proposed TS 6.5.9, "Steam Generator (SG) Program," paragraph "f" refers to the installation of leak-tight sleeves for repairing defective tubes. Since the licensee's amendment request regarding the partial inspection of tubes within the hot-leg tubesheet (C*) did not address portions of sleeves extending outside the C* distance, the staff has asked for additional information about this issue as part of the C* review. The staff notes here that any changes made as a result of the C* review must be fully consistent with the TS changes proposed in this TSTF amendment.
3. In the proposed TS 6.5.9, "Steam Generator (SG) Program," Section 6.5.9.d does not include paragraph 1 from the corresponding TSTF-449 section (5.5.9.d.1), which states, "Inspect 100% [percent] of the tubes in each SG during the first refueling outage following SG replacement." Please discuss your plans to include this statement in your TS.
4. The second paragraph of the Insert B-1 Safety Analysis refers to the amount of leakage assumed from the faulted and unfaulted SGs. Please discuss your reason for assuming that leakage from unfaulted SGs will be greater than or equal to 75 gallons per day.
5. Regarding Insert B-1, Section 3/4.4.4, STEAM GENERATOR TUBE INTEGRITY, the first paragraph of the Background section leaves out the last four sentences from the corresponding paragraph in the TSTF:

The SG tubes isolate the radioactive fission products in the primary coolant from the secondary system. In addition, as part of the RCPB [reactor coolant pressure boundary], the SG tubes are unique in that they act as the heat transfer surface between the primary and secondary systems to remove heat from the primary system. This Specification addresses only the RCPB integrity function of the

SG. The SG heat removal function is addressed by LCO 3.4.4, "RCS [reactor coolant system] Loops - MODES 1 and 2," LCO 3.4.5, "RCS Loops - MODE 3," LCO 3.4.6, "RCS Loops - MODE 4," and LCO 3.4.7, "RCS Loops - MODE 5, Loops Filled."

Please provide your reason for omitting these sentences (with section numbers appropriate for Waterford 3 in your proposed bases.

6. In the section of Insert B-1 called "Limiting Condition for Operation," the final item on performance criteria addresses operational leakage. It does not include the following sentences in the TSTF (B.3.4.18) explaining the basis for an operational leakage criterion:

This limit is based on the assumption that a single crack leaking this amount would not propagate to a SGTR [steam generator tube rupture] under the stress conditions of a LOCA or a main steam line break. If this amount of LEAKAGE is due to more than one crack, the cracks are very small, and the above assumption is conservative.

Please discuss the reason for omitting these sentences.

7. In the proposed insert B-1, Action b (page 6 of Attachment 3) uses different language than the TSTF. This action refers to tubes that met the tube repair criteria but were not plugged or repaired according to the Steam Generator Program (new TS 6.5.9). The licensee's proposed wording is, "An allowed outage time of 7 days ...," while the TSTF states, "A completion time of 7 days ..." Please discuss the meaning of "allowed outage time" in this context, as well as why this wording is being used rather than the TSTF wording. Alternatively, please discuss your plans to revise the proposed specifications to adopt the TSTF language.
8. The licensee's cover letter for the proposed TS changes discusses the inclusion of non-pressure loads into accident-induced leakage analyses. The staff notes that the Nuclear Energy Institute, in Enclosure 1 to a letter dated September 2, 2005, has now offered language that identifies this issue and NEI's position.
9. Please note that TS 6.5.9.d contains a typographical error in the second sentence: "The number an portions of the tubes inspected" The word "an" should be "and."

Waterford Steam Electric Station, Unit 3

cc:

Mr. Michael E. Henry, State Liaison Officer
Department of Environmental Quality
Permits Division
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Vice President Operations Support
Entergy Operations, Inc.
P. O. Box 31995
Jackson, MS 39286-1995

Director
Nuclear Safety Assurance
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

Wise, Carter, Child & Caraway
P. O. Box 651
Jackson, MS 39205

General Manager Plant Operations
Waterford 3 SES
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

Licensing Manager
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

Winston & Strawn
1700 K Street, N.W.
Washington, DC 20006-3817

Resident Inspector/Waterford NPS
P. O. Box 822
Killona, LA 70066-0751

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

Parish President Council
St. Charles Parish
P. O. Box 302
Hahnville, LA 70057

Executive Vice President
& Chief Operating Officer
Entergy Operations, Inc.
P. O. Box 31995
Jackson, MS 39286-1995

Chairman
Louisiana Public Services Commission
P. O. Box 91154
Baton Rouge, LA 70825-1697

May 2005