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Waterford 3

W3F1-2006-0027

June 14, 2006

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

SUBJECT: License Amendment Request To Delete Vendor
Recommended Diesel Generator Surveillance Requirement
Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests an amendment of the Waterford Steam Electric Station, Unit 3 (Waterford 3) Technical Specifications (TS). The proposed change will delete Waterford 3 TS Surveillance Requirement (SR) 4.8.1.1.2.f. This SR requires that the emergency diesel generator (EDG) be subjected to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations. The proposed change is based on NUREG-1432, Revision 3.1, *Standard Technical Specifications Combustion Engineering Plants*.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that this change involves no significant hazards consideration. The bases for these determinations are included in the attached submittal.

The proposed change includes new commitments as summarized in Attachment 3. The NRC has approved a similar Technical Specification change for Arkansas Nuclear One, Unit 2.

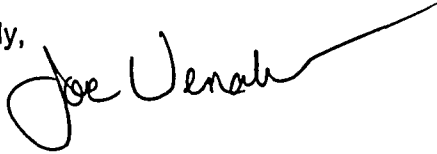
Entergy requests approval of the proposed amendment by February 1, 2007. Once approved, the amendment shall be implemented within 60 days. Although this request is neither exigent nor emergency, your prompt review is requested.

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

A001

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 14, 2006.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Venah", with a long horizontal flourish extending to the right.

JEV/DM/cbh

Attachments:

1. Analysis of Proposed Technical Specification Change
2. Proposed Technical Specification Changes (mark-up)
3. List of Regulatory Commitments

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Attachment 1

W3F1-2006-0027

Analysis of Proposed Technical Specification Change

1.0 DESCRIPTION

This letter is a request to amend the Waterford Steam Electric Station, Unit 3 (Waterford 3) Operating License NPF-38.

The proposed change will delete the Waterford 3 Technical Specification (TS) Surveillance Requirement (SR) 4.8.1.1.2.f associated with the Emergency Diesel Generator (EDG). This SR requires that the EDG be subjected to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations. The proposed change is based on NUREG-1432, Revision 3.1, *Standard Technical Specifications Combustion Engineering Plants* (Reference 1).

Entergy requests approval of the proposed amendment by February 1, 2007 in order to accommodate scheduling activities related to the manufacturer's recommended inspections. Once approved, the amendment shall be implemented within 60 days. Although this request is neither exigent nor emergency, your prompt review is requested.

2.0 PROPOSED CHANGE

Waterford 3 SR 4.8.1.1.2.f states the following:

"At the first refueling outage, and thereafter, at intervals not to exceed 24 months, subject the diesels to an inspection in accordance with the procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service."

The proposed change will delete this SR.

In summary, changes consistent with NUREG-1432 (Reference 1) are proposed. Surveillance Requirement 4.8.1.1.2.f will be deleted.

3.0 BACKGROUND

Surveillance Requirement 4.8.1.1.2.f requires that the EDG be subjected to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations. This SR is a maintenance activity that does not verify the ability of the EDG to perform its safety function. The manufacturer's recommended inspections required by this surveillance are included in plant procedures.

The manufacturer's recommended inspections are not described in the Waterford 3 Updated Final Safety Analysis Report (UFSAR).

4.0 TECHNICAL ANALYSIS

Surveillance Requirement 4.8.1.1.2 f is a maintenance activity that does not verify the ability of the EDG to perform its safety function. The manufacturer's recommended inspections of the EDG required by this surveillance are included in plant procedures and will continue to be included in plant procedures upon approval of this amendment. Any changes to the surveillance procedures are subject to reviews in accordance with Entergy's 10 CFR 50.59 Review Program. The proposed change is consistent with Generic Letter 95-10, *Relocation of Selected Technical Specifications Requirements Related to Instrumentation* (Reference 2), and NUREG-1432, *Standard Technical Specifications Combustion Engineering Plants* (Reference 1).

The manufacturer's recommended inspection and maintenance activities include the following:

Engine

1. Inspect turning gear.
2. Ensure engine and generator foundation bolts are tight.
3. Remove injection nozzles. Check opening pop pressure and spray pattern if engine analysis indicates out of balance combustion pressure or timing conditions.
4. Inspect the interior of all power cylinders including liners, heads, piston crowns, valves and seats.
5. Visually inspect engine crankcase cylinder liners, expansion seal, visual portions of the piston skirt, and general appearance of all components including fasteners.
6. Replace fuel oil filter elements if differential pressure indicates this is necessary.
7. Inspect lube oil strainers for foreign material and metal particles.
8. Replace elements in lube oil filter if differential pressure indicates this is necessary.
9. Replace elements in turbocharger lube oil filter if differential pressure indicates this is necessary.
10. Inspect rocker arm assemblies.
11. Check operation and/or calibration of control and safety shutdown devices not covered by site specific inspection and maintenance procedures.
12. Change lube oil in the speed regulating and over speed governors on a three-year basis or compatible site specific program.
13. Check valve timing and tappet clearance on at least one cylinder per bank.
14. Inspect fuel pump and valve cam lobes and rollers.
15. Measure turbocharger thrust bearing clearance.
16. Inspect air inlet system for evidence of dirt or debris, and replace/clean filter media as necessary.
17. Inspect forward end auxiliary drive.
18. Inspect flywheel end camshaft drive.
19. Re-time high pressure fuel pumps, if needed.
20. Replace/repair jacket water pump, lube oil pump, fuel oil pump, and high pressure fuel oil pump as needed based on specific pump performance trending.
21. Replace all non-metallic flexible hoses.
22. Clean rod bearing trip valves and replace their O-rings.
23. Replace thermostatic elements in jacket water and lube oil temperature control valves.
24. Inspect and clean cylinder head breathers.

25. Replace lube oil in the outboard bearing based upon site specific periodic or analysis program.
26. Inspect and clean coolers – lube oil, jack water, and intercoolers.

Generator

1. Check tightness of thermal connections on the generator.
2. Measure and evaluate generator winding insulation resistance measurements to ground.
3. Clean insulated generator windings.
4. Measure and record generator rotor to stator air gap at four locations 90° apart at the outboard bearing end of the rotor.
5. Replace lube oil in the generator outboard pedestal bearing.
6. Clean air inlet casing to the generator stator.
7. Inspect all electrical motors.
8. Inspect collector rings, brushes including alignment, and pigtails.
9. Check for insulation cracks in the region around the generator pole bolts.
10. Inspect generator frame and fasteners for unusual signs of distress.
11. Ensure insulation between outboard bearing and pedestal is not painted and there is no electrical continuity across it.

Miscellaneous Electrical

1. Maintain lube oil and jacket water pump motors in accordance with established site specific procedures.
2. Check the calibration of the differential current sensing relay.
3. Check mechanical condition of switchgear including diesel generator output breaker and safety related relays.
4. Where applicable, inspect dropping resistor in Woodward 2301 governor for indications of overheating or deterioration.
5. Replace Agastat GP and EGP series relays in accordance with vendor recommendations or site specific programs.

Maintenance and inspection activities are performed on a frequency driven and/or condition based approach. Some items are performed on a fixed frequency and others are deferred or modified based on trending and previous inspection results.

5.0 REGULATORY ANALYSIS

5.1 Applicable Regulatory Requirements/Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met.

General Design Criteria (GDC) 17, *Electric Power Systems*, of Appendix A, *General Design Criteria for Nuclear Power Plants*, to 10 CFR 50, *Domestic Licensing of Production and Utilization Facilities*, requires that an onsite electric power system and an offsite electric power system be provided to permit functioning of structures, systems, and components

important to safety. The GDC 17 also includes requirements concerning system capacity, capability, independence, redundancy, availability, testability, and reliability. The proposed change to the Waterford Steam Electric Station, Unit 3 (Waterford 3) Technical Specifications (TS) associated with the emergency diesel generator (EDG) to delete the manufacturer's recommended inspections does not reduce Waterford 3's conformance with GDC 17.

Entergy has determined that the proposed change does not require any exemptions or relief from regulatory requirements, other than the TS, and does not affect conformance with any GDC differently than described in the Updated Final Safety Analysis Report (UFSAR).

The deletion of SR 4.8.1.1.2 f has been evaluated against the four criterion of 10 CFR 50.36, *Technical specifications*, to determine if the SR should be included in the TSs. Performance of the vendor recommended inspections does not impact the reactor coolant system pressure boundary. The maintenance activities associated with the vendor recommended inspections are not process variables, design features, or operating restrictions that would result in the failure of or present a challenge to the integrity of a fission product barrier. The ability of the EDG to perform its safety function is not proven by the performance of the vendor recommended inspections and therefore, does not impact the systems capability of mitigating a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. Deletion of the SR does not result in the deletion of the requirement to maintain the EDG operable; therefore, the health and the safety of the public will be assured.

5.2 No Significant Hazards Consideration

The proposed change deletes the Waterford Steam Electric Station, Unit 3 (Waterford 3) Technical Specification (TS) Surveillance Requirement (SR) that requires the emergency diesel generator (EDG) be subjected to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations. The proposed change is based on NUREG-1432, Revision 3.1, *Standard Technical Specifications Combustion Engineering Plants*.

Entergy Operations, Inc. has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The ability of the emergency diesel generator to perform its safety function is not proven by the performance of the manufacturer's recommended inspections. The inspections are not considered an initiator or mitigating factor in any previously evaluated accidents.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change results in the deletion of the SR associated with the performance of manufacturer's inspections. No modifications to plant structures, systems, or components, or changes in the design of the plant structures, systems, or components are required to support the proposed TS change.

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

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The ability of the emergency diesel generator to perform its safety function is not proven by the performance of the manufacturer's recommended inspections. Inspection activities will continue to be performed.

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

Based on the above, Entergy concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.3 Environmental Considerations

The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 PRECEDENCE

1. ANO-2 TS Amendment No. 237 dated December 17, 2001. This amendment included the deletion of the SR to perform the vendor recommended inspections.

7.0 REFERENCES

1. NUREG-1432, Revision 3.1, *Standard Technical Specifications Combustion Engineering Plants*
2. Generic Letter 95-10, *Relocation of Selected Technical Specifications Requirements Related to Instrumentation*

Attachment 2

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Proposed Technical Specification Changes (mark-up)

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

8. During shutdown, verifying the diesel generator's capability to:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
 - b) Transfer its loads to the offsite power source, and
 - c) Be restored to its standby status.
9. During shutdown, verifying that with the diesel generator operating in a test mode (connected to its bus), a simulated safety injection signal overrides the test mode by (1) returning the diesel generator to standby operation and (2) automatically energizes the emergency loads with offsite power.
10. Verifying that each fuel transfer pump transfers fuel to its associated diesel oil feed tank by taking suction from the opposite train fuel oil storage tank via the installed cross connect.
11. During shutdown, verifying that the automatic load sequence timer is OPERABLE with the time of each load block within $\pm 10\%$ of the sequenced load block time.
12. Verifying that the following diesel generator lockout features prevent diesel generator starting only when required:
 - a) turning gear engaged
 - b) emergency stop
 - c) loss of D.C. control power
 - d) governor fuel oil linkage tripped
- f. ~~At the first refueling outage, and thereafter, at intervals not to exceed 24 months, subject the diesels to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service. Deleted~~
- g. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting the diesel generators simultaneously, during shutdown, and verifying that the diesel generators accelerate to at least 600 rpm (60 ± 1.2 Hz) in less than or equal to 10 seconds.
- h. At least once per 10 years by:
 1. Draining each diesel generator fuel oil storage tank, removing the accumulated sediment, and cleaning the tank using a sodium hypochlorite solution or equivalent.

Attachment 3

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List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
The manufacturer's recommended inspections of the EDG required by this surveillance are included in plant procedures and will continue to be included in plant procedures upon approval of this amendment.		X	