



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

December 22, 2008

Vice President, Operations  
Entergy Operations, Inc.  
Waterford Steam Electric Station, Unit 3  
17265 River Road  
Killona, LA 70057-3093

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - REQUEST FOR  
ADDITIONAL INFORMATION RE: RELOCATION OF TECHNICAL  
SPECIFICATIONS 3.7.8 AND ADDITION OF LIMITING CONDITION OF  
OPERATION 3.0.8 (TAC NO. MD9672)

Dear Sir/Madam:

By letter dated September 18, 2008 to the U.S. Nuclear Regulatory Commission (NRC), Entergy Operations, Inc. (Entergy, the licensee), submitted an application for a license amendment request (LAR) requesting an amendment to the license in the form of changes to the Technical Specification (TS) requirements for inoperable snubbers by relocating the current TS 3.7.8, "Snubbers," to the Technical Requirements Manual and adding Limiting Condition for Operation (LCO) 3.0.8. The proposed amendment is based, in part, on the NRC approved Industry/Technical Specification Task Force (TSTF) change to the Improved Standard Technical Specifications TSTF-372-A, Rev. 4, entitled "Addition of LCO 3.0.8, Inoperability of Snubbers."

The NRC staff has reviewed the application and determined that additional information contained in the enclosure is needed to complete the review. The NRC staff discussed the additional information needed with Mr. R. Williams of the Entergy staff and the Entergy representative stated that no telephone call was needed and agreed to provide a response within 30 days of the receipt of this letter.

If you have any questions, please contact me at (301) 415-1480 or by email at [kaly.kalyanam@nrc.gov](mailto:kaly.kalyanam@nrc.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "N. Kalyanam", with a horizontal line underneath the name.

N. Kalyanam, 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.: Distribution via Listserv

OFFICE OF NUCLEAR REACTOR REGULATION  
REQUEST FOR ADDITIONAL INFORMATION  
WATERFORD STEAM ELECTRIC STATION, UNIT 3  
LICENSE AMENDMENT REQUEST REGARDING  
INOPERABILITY OF SNUBBERS (NPF-38-279)

By letter dated September 18, 2008 to the U.S. Nuclear Regulatory Commission (NRC), Entergy Operations, Inc. (Entergy, the licensee), submitted an application for a license amendment request (LAR) requesting an amendment to the license in the form of changes to the Technical Specification (TS) requirements for inoperable snubbers by relocating the current TS 3.7.8, "Snubbers," to the Technical Requirements Manual and adding Limiting Condition for Operation (LCO) 3.0.8. The NRC staff has reviewed the application and determined that additional information needed to complete the review.

In accordance with the NRC staff's approval and inherent in the implementation of Technical Specification Task Force (TSTF)-372 Revision 4, licensees interested in implementing LCO 3.0.8 must commit to operate in accordance with Tier 2 restrictions. Tier 2 restrictions (Conditions) involve the identification of potentially high-risk configurations that could exist if equipment in addition to that associated with the change were to be taken out of service simultaneously, or other risk significant operational factors such as concurrent equipment testing were also involved. Section 3.0, Regulatory Analysis, Subsection 3.2, Verification and Commitments, discusses two conditions for application of TSTF-372 specified in the model Safety Evaluation.

1. Appropriate plant procedures and administrative controls will be used to implement the following Tier 2 Restrictions.
  - (a) At least one AFW [auxiliary feedwater] train (including a minimum set of supporting equipment required for its successful operation) not associated with the inoperable snubber(s), must be available when LCO 3.0.8a is used at PWR [pressurized water reactor] plants.
  - (b) At least one AFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the inoperable snubber(s), or some alternative means of core cooling (e.g., F&B [feed and bleed], fire water system or "aggressive secondary cooldown" using the steam generators) must be available when LCO 3.0.8b is used at PWR plants.

Regarding Condition 1.a Entergy wrote:

Condition 1(a) assumes the availability of one Emergency Feedwater (EFW) train during application of LCO 3.0.8.a. The TSTF-372 and the model SE specify the application of LCO 3.0.8.a is contingent on the assumption that the redundant

Enclosure

train remains available. Even though Waterford 3 has a unique EFW system design, the plant TS LCO and ACTION statements will ensure the system remains capable of performing its safety function with various combinations of pumps and flow paths OPERABLE. Although the TS implementation process at Waterford 3 may include this restriction in other procedures or administrative processes upon approval of this amendment, Entergy does not believe further action is required to ensure compliance with Condition 1(a) since the TS inherently prevents application of LCO 3.0.8.a due to a snubber-related condition which could render the entire EFW system inoperable.

Regarding Condition 1.b, Entergy wrote:

Condition 1(b) requires either one EFW train or some alternative means of core cooling must be available when one or more snubbers are inoperable that affect both trains of a given system. As described in Condition 1(a) above, there are no instances where the EFW system or both trains of any system being relied upon as the only core cooling method would be removed from service or any work permitting both at the same time during its associated Modes of Applicability that require these systems. Again, such a plant configuration would result in LCO 3.0.3 entry or plant shutdown, which prevents the utilization of the 12-hour allowance of LCO 3.0.8.b. Although the TS implementation process at Waterford 3 may include this restriction in other procedure or administrative processes upon approval of this amendment, Entergy believes the TS LCO and ACTION statements will ensure the system remains capable of performing its safety function with no further action required to ensure compliance with Condition 1(b).

It is not clear to the NRC staff what these statements mean in terms of taking actions to implement Tier 2 restrictions. Conclusions made by the licensee that would result in exceptions to or deviations from TSTF-372 model SE requirements to establish plant procedures and administrative controls to implement Tier 2 Restrictions need to include an analysis basis for the conclusion. Please address this issue for Condition 1(a) and 1(b) conclusions.

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December 22, 2008

Vice President, Operations  
Entergy Operations, Inc.  
Waterford Steam Electric Station, Unit 3  
17265 River Road  
Killona, LA 70057-3093

**SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - REQUEST FOR ADDITIONAL INFORMATION RE: RELOCATION OF TECHNICAL SPECIFICATIONS 3.7.8 AND ADDITION OF LIMITING CONDITION OF OPERATION 3.0.8 (TAC NO. MD9672)**

Dear Sir/Madam:

By letter dated September 18, 2008 to the U.S. Nuclear Regulatory Commission (NRC), Entergy Operations, Inc. (Entergy, the licensee), submitted an application for a license amendment request (LAR) requesting an amendment to the license in the form of changes to the Technical Specification (TS) requirements for inoperable snubbers by relocating the current TS 3.7.8, "Snubbers," to the Technical Requirements Manual and adding Limiting Condition for Operation (LCO) 3.0.8. The proposed amendment is based, in part, on the NRC approved Industry/Technical Specification Task Force (TSTF) change to the Improved Standard Technical Specifications TSTF-372-A, Rev. 4, entitled "Addition of LCO 3.0.8, Inoperability of Snubbers."

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If you have any questions, please contact me at (301) 415-1480 or by email at [kaly.kalyanam@nrc.gov](mailto:kaly.kalyanam@nrc.gov).

Sincerely,  
/RA/  
N. Kalyanam, 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.: Distribution via Listserv

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ADAMS Accession No. ML083460295

\*No major change from Staff provided RAI  
~~XX PREVIOUSLY OCCURRED~~

OFFICE	NRR/LPL4/PM	NRR/LPL4/PM	NRR/DIRS/ITSB	NRR/LPL4/BC	NRR/LPL4/PM
NAME	NKalyanam <i>NK</i>	GLappert <i>GL</i>	RElliott	MMarkley <i>MM</i>	NKalyanam <i>NK</i>
DATE	12-22-08	12/18/08	11/21/08	12/22/08	12-22-08

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