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Kevin T. Walsh
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Waterford 3

W3F1-2008-0051

January 8, 2009

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Entergy's Response to NRC's Request for Additional Information (RAI) Regarding License Amendment Request to Modify Requirements Regarding Control Room Envelope Habitability
Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

References:
1. Entergy letter dated August 16, 2007, "License Amendment Request NPF-38-273 To Modify Requirements Regarding Control Room Envelope Habitability"
2. NRC letter dated July 11, 2008, "Request for Additional Information Regarding License Amendment Request to Modify Requirements Regarding Control Room Envelope Habitability"

Dear Sir or Madam:

By letter dated August 16, 2007 (Reference 1), Entergy Operations, Inc. (Entergy) proposed changes to the Waterford 3 Technical Specifications (TSs) consistent with NRC approved Industry/Technical Specification Task Force traveler TSTF-448, Revision 3, "Control Room Habitability." On July 11, 2008, Entergy received an NRC request for additional information (RAI) regarding Entergy's proposed License Amendment Request. In addition to the response to the RAI, Entergy has updated the License Condition as submitted in Reference 1 to reflect the latest date of the Control Room pressure boundary test. This change is documented on attachment 2 as insert 4. The specific change is indicated by revision bar.

The response includes additional TS changes that better align the Waterford 3 TS with TSTF-448. The original no significant hazards consideration included in Reference 1 is not affected by any information or changes proposed by this supplemental letter.

Attachment 2 provides marked-up TS pages that show proposed modifications to the original changes submitted by Reference 1. Attachment 3 provides additional TS Bases changes for your information which, in part, address the NRC RAI.

Attachment 4 contains the new commitments for this submittal.

A102
NRR

Please contact Robert J. Murillo at (504) 739-6715 if you have any questions or require additional information.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 8, 2009.

Sincerely,

KTW/GCS/ssf

Attachments:

1. Response to Request for Additional Information (RAI) Regarding License Amendment Request to Modify Requirements Regarding Control Room Envelope Habitability
2. Marked up TS Pages
3. Changes to Technical Specification Bases 3/4.7.6.1
4. List of Regulatory Commitments

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Attachment 1

W3F1-2008-0051
Response to Request for Additional Information (RAI) Regarding License Amendment Request to Modify Requirements Regarding Control Room Envelope Habitability

Response to Request for Additional Information (RAI) Regarding License Amendment Request to Modify Requirements Regarding Control Room Envelope Habitability

RAI 1

Please explain how partial adoption of U.S. Nuclear Regulatory Commission (NRC) approved Technical Specification Task Force (TSTF)-448, Rev. 3, will ensure that the Technical Specifications (TS) will contain adequate Surveillance Requirements (SR) per Title 10 of the Code of Federal Regulations (10 CFR) 50.36(d)(3).

Background: 10 CFR 50.36(d)(3) states that TS will include SR which "are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

Proposed SR 4.7.6.1.g is equivalent to SR 3.7.11 4 (CE Plants) in NRC approved TSTF-448, Rev. 3, "Control Room Habitability." SR 3.7.11.4 in TSTF-448, Rev. 3 contains a Bases discussion that provides amplifying information on the evaluation criteria used for the SR and also provides amplifying information on the TS actions that are carried out when the evaluation criteria is not met. This amplifying information ensures that the SR is conducted in a manner such that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met per 10 CFR 50.36 (d)(3). The proposed SR 4.7.6.1 .g does not contain the Bases discussion as found in TSTF-448, Rev. 3, therefore it is unclear how SR 4.7.6.1 g will meet 10 CFR 50.36(d)(3).

Entergy Response:

The proposed License Amendment Request (LAR) fully adopts the Technical Specification Task Force (TSTF)-448, Revision 3, for the proposed change to Surveillance Requirement (SR) 4.7.5.1.g. Consistent with the TSTF, proposed TS 6.5.17, "Control Room Envelope Habitability Program," prescribes the testing method, testing frequency, and the unfiltered inleakage limit associated with SR 4.7.6.1.g. The evaluation criteria that will be used for SR 4.7.6.1.g along with amplifying information on the TS actions to be completed when the evaluation criteria is not met will be included in the TS Bases and will incorporate the Bases information in TSTF-448, Revision 3. The Bases will be changed concurrent with the implementation of the LAR via the Bases Control Program. Attachment 3 provides a proposed change for the TS Bases.

RAI 2

Describe which portions of the Control Room Air Conditioning System are applicable to the limiting conditions of operations (LCO) 3.7.6.1, "Control Room Emergency Air Filtration Trains (S-8)," and which portions are applicable to proposed LCO 3.7.6.5, "Control Room Air Isolation and Intake Valves," in order to ensure that actions listed in the LCOs continue to meet 10 CFR 50.36(d)(2)(i).

Background: 10 CFR 50.36(d)(2)(i) states TS will include LCO which "are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee

shall shut down the reactor or follow any remedial action permitted by the TS until the condition can be met." LCO 3.7.6.1, "Control Room Emergency Air Filtration Trains (S-8)" and LCO 3.7.6.5, "Control Room Isolation and Pressurization Boundaries," are retained in the TS in order to ensure that 10 CFR 50.36{d)(2}(i) is met.

LCO 3.7.6.1, "Control Room Emergency Air Filtration Trains (S-8)" currently applies to only the Control Room Emergency Air Filtration Trains (S-8) of the Control Room Air Conditioning System. LCO 3.7.6.5, "Control Room Isolation and Pressurization Boundaries," applies to the Control Room Envelope (CRE) and also applies to portions of the Control Room Air Conditioning System that provide isolations for the CRE.

The LAR proposes to modify LCO 3.7.6.5, "Control Room Isolation and Pressurization Boundaries," by changing it to LCO 3.7.6.5, "Control Room Air Isolation and Intake Valves," and moves the CRE operability requirements (except the isolation valves) to LCO 3.7.6.1, "Control Room Emergency Air Filtration Trains (5-8)." LCO 3.7. 6.1, "Control Room Emergency Air filtration Trains (S-8)," now has operability requirements for the CRE, but the LCO still only states "two Control Room Emergency Air Filtration Trains (S-8) shall be operable." Based on LCO 3.7.6.1 remaining the same, it is unclear if the portion of the Control Room Air Conditioning System that consists of the Control Room Emergency Air Filtration Train (S-8) has now been expanded. Referring to FSAR figure 9.4-3, "Reactor Auxiliary Building Ventilation Systems," or figure 6.4-1, "Control Room Air conditioning System Normal Operating Mode," discuss which portions of the Control Room Air Conditioning System are applicable to LCO 3.7.6.1, "Control Room Emergency Air Filtration Trains (8-8)," and which portions are applicable to LCO 3.7. 6. 5, "Control Room Air Isolation and Intake Valves." Having an understanding of how portions of the Control Room Air Conditioning System are divided between LCOs 3.7.6.1 and 3.7.6.5 is needed in order to ensure that actions listed in the LCO are appropriate, thereby ensuring that the lowest functional capability or performance levels of equipment required for safe operation of the facility is met per 10 CFR 50.36(d)(2)(i).

Entergy's Response:

Entergy's License Amendment Request (LAR) for the Control Room Habitability Technical Specification change, as documented in letter W3F1-2007-0033 dated August 16, 2007, did not clearly communicate which portions of the Control Room Air Conditioning System are applicable to the limiting conditions of operations (LCO) 3.7.6.1, "Control Room Emergency Air Filtration Trains (S-8)," and which portions are applicable to proposed LCO 3.7.6.5, "Control Room Air Isolation and Intake Valves. Following discussions with the NRC staff, Entergy is proposing to revise the LAR by deleting LCO 3.7.6.5 and incorporating those requirements into LCO 3.7.6.1 to be more consistent with TSTF-448. Based on this changes, the specific questions of the RAI are no longer applicable to the LAR as all portions of the Control Room Air Condition System are applicable to LCO 3.7.6.1.

The following modifications are proposed (added text is bolded to indicate changes).

1. TS 3.7.6.5 is deleted in its entirety.
2. New action d.1 of TS 3.7.6.1(INSERT 1 on page 9 of Attachment 2 to Reference 1) is modified as:

Immediately place OPERABLE control room emergency air filtration train in emergency radiation protection mode **(or toxic gas isolation mode if automatic transfer to toxic gas isolation mode is inoperable)**; or

The change is consistent with TSTF-448 and is needed because the isolation function for toxic gas protection is relocated from TS 3.7.6.5.

3. SR 4.7.6.1.d.2 is modified as:

   Verifying that on a safety injection actuation test signal or a high radiation test signal, the train automatically switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks **and the normal outside air flow paths are isolated**.

   The change is added to clarify that in the recirculation mode, the normal outside air flow paths are isolated. This specific verification was previously included with SR 4.7.6.5.c which is being deleted.

4. New SR 4.7.6.1.d.4 is added as:

   Verifying that on a toxic gas detection signal, the system automatically switches to the isolation mode of operation.

   The change is needed because the isolation function for toxic gas protection is relocated from TS 3.7.6.5 to TS 3.7.6.1. This surveillance was previously listed as SR 4.7.6.5.b which is being deleted.

RAI 3

It is unclear as to whether approval of this amendment would ensure that 10 CFR 50.36(d)(2)(i) would continue to be met. Explain how actions a, b, and c of LCO 3.7.6.5 will result in immediate or steady state conditions with unfiltered air inleakage lower than the assumed flow rate in the licensing basis analyses of DBA consequences.

Background: The LAR proposes to modify LCO 3.7.6.5, "Control Room Isolation and Pressurization Boundaries," by changing it to LCO 3.7 6 5, "Control Room Air Isolation and Intake Valves," and modifies and moves the CRE operability requirements (except the isolation valves) to LCO 3.7.6.1, "Control Room Emergency Air Filtration Trains (S-8)". The proposed actions for an inoperable CRE that are modified and relocated to LCO 3.7.6.1 are consistent with TSTF-448, Rev. 3. The proposed actions and SR verify that the unfiltered air inleakage into the CRE is no greater than the flow rate assumed in the licensing basis analyses of DBA consequences. When unfiltered air inleakage is greater than the assumed flow rate, mitigating actions are taken. However, actions a, b, and c of LCO 3.7.6.5 remain the same. It is unclear if actions a, b, and c will result in immediate or steady state conditions with unfiltered air inleakage greater than the assumed flow rate in the licensing basis analyses of design basis accidents (DBA) consequences, which could result in the lowest functional capability or performance levels of equipment required for safe operation of the facility not being met per 10 CFR 50.36(d)(2)(i).

Entergy's Response

As discussed in the response to Question 2, Entergy is proposing to delete LCO 3.7.6.5 and incorporate those requirements into LCO 3.7.6.1.

The control room normal flow path isolation valves and the emergency intake isolation valves are considered to be part of the CRE boundary. Thus, the inoperability of any of these valves will require action b of TS 3.7.6.1 to be met. These actions ensure that unfiltered inleakage will remain within limits.

Attachment 2

W3F1-2008-0051

Additional Marked up Changes to Technical Specifications

Deleted

PLANT SYSTEMS

CONTROL ROOM ISOLATION AND PRESSURIZATION

LIMITING CONDITION FOR OPERATION

3.7.6.5 The control room envelope isolation and pressurization boundaries shall be OPERABLE.

APPLICABILITY: All MODES and during movement of irradiated fuel assemblies.

ACTION:

a. With either control room envelope isolation valve in a normal outside air flow path inoperable, maintain at least one isolation valve in the flowpath OPERABLE, and either restore the inoperable valve to OPERABLE status with 7 days or isolate the affected flow path within the following 6 hours.

b. With any Control Room Emergency Filter Outside Air Intake valve(s) inoperable, maintain at least one of the series isolation valves in a flowpath OPERABLE, and either restore the inoperable valve(s) to OPERABLE status within 7 days or isolate the affected flow path within the following 6 hours.

c. With more than one Control Room Emergency Filter Outside Air Intake flow path inoperable, maintain at least one flow path per intake operable and restore an additional flow path to operable status within 7 days or, be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

d. With the control room envelope inoperable as a result of causes other than those addressed by ACTION (a), (b), or (c) above:

1. Within 1 hour and at least once per 12 hours thereafter while the control room envelope is inoperable, verify that the Emergency Breathing Airbanks pressure is greater than or equal to 1800 psig.

2. MODES 1-4:

a. If the cause of control room envelope inoperability is due to a known breach in the envelope of less than or equal to one square foot total area or the breach is associated with a permanent sealing mechanism (e.g., blocking open or removing a door) then operation may continue for up to 7 days after the control room envelope is declared inoperable. Otherwise, be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

Deleted

PLANT SYSTEMS

LIMITING CONDITION FOR OPERATION

ACTION: (Continued)

b. If the cause of control room envelope inoperability is unknown identify the cause within 48 hours. If the cause of the failure is due to a breach within the allowable limits of ACTION d.2.a then operation may continue for up to 7 days after the control room envelope is declared inoperable. Otherwise, be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

c. Should a toxic gas event occur, take immediate steps to restore control room envelope integrity.

3. MODES 5, 6, and during movement of irradiated fuel assemblies:

a. Suspend all operations involving CORE ALTERATIONS and movement of irradiated fuel assemblies, and if a toxic gas event occurs, take immediate steps to restore control room envelope integrity.

SURVEILLANCE REQUIREMENTS

4.7.6.5 The control room envelope isolation and pressurization boundaries shall be demonstrated OPERABLE at least once per 18 months by:

a. Verifying that the control room envelope can be maintained at a positive pressure of greater than or equal to 1/8 inch water gauge relative to the outside atmosphere with a make-up air flowrate less than or equal to 200 cfm during system operation.

b. Verifying that on a toxic gas detection test signal, the system automatically switches to the isolation mode of operation.

c. Verifying that on a safety injection actuation test signal or a high radiation test signal, normal outside air flow paths isolate.

Insert 1

a. With one control room emergency air filtration train inoperable for reasons other than ACTION b, restore the inoperable train to OPERABLE status within 7 days.

b. With one or more control room emergency air filtration trains inoperable due to inoperable control room envelope boundary in MODES 1, 2, 3, or 4, then perform the following:

1. Immediately initiate action to implement mitigating actions; and
2. Within 24 hours, verify mitigating actions ensure control room envelope occupant exposures to radiological, chemical, and smoke hazards will not exceed limits; and
3. Within 90 days, restore the control room envelope boundary to OPERABLE status.

c. If the required ACTION and associated allowable outage times of ACTION a or b are not met in MODES 1, 2, 3, or 4, then be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

d. If the required ACTION and the associated allowable outage time of ACTION a is not met in MODES 5 or 6, or during movement of irradiated fuel assemblies, then perform the following:

1. Immediately place OPERABLE control room emergency air filtration train in emergency radiation protection mode; or
2. Immediately suspend movement of irradiated fuel assemblies and operations involving CORE ALTERATIONS.

e. With one or more control room emergency air filtration trains inoperable due to an inoperable control room envelope boundary in MODES 5 or 6, or during movement of irradiated fuel assemblies, immediately suspend movement of irradiated fuel assemblies and operations involving CORE ALTERATIONS.

f. With two control room emergency air filtration trains inoperable in MODES 1, 2, 3, or 4 for reasons other than ACTION b, immediately enter LCO 3.0.3.

g. With two control room emergency air filtration trains inoperable in MODES 5 or 6 or during movement of irradiated fuel assemblies, immediately suspend movement of irradiated fuel assemblies and operations involving CORE ALTERATIONS.

(or toxic gas protection mode if automatic transfer to toxic gas protection mode is inoperable)

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows the methyl iodide penetration less than 0.5% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and a relative humidity of 70%.

3. Verifying a system flow rate of 4225 cfm ±10% during train operation when tested in accordance with ANSI N510-1975.

c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows the methyl iodide penetration less than 0.5% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and a relative humidity of 70%.

d. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 7.8 inches water gauge while operating the train at a flow rate of 4225 cfm ±10%.

2. Verifying that on a safety injection actuation test signal or a high radiation test signal, the train automatically switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks and the normal outside airflow paths isolate.

3. Verifying that heaters dissipate 10 +1.0, -1.0 kW when tested in accordance with ANSI N510-1975.

e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the train at a flow rate of 4225 cfm ±10%.

f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the train at a flow rate of 4225 cfm ±10%.

g. Insert 2

4. Verifying that on a toxic gas detection signal, the system automatically switches to the isolation mode of operation.

Insert 4

Upon implementation of Amendment No. xxx adopting TSTF–448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 6.5.17, in accordance with TS 6.5.17.c.(i), the assessment of CRE habitability as required by Specification 6.5.17.c.(ii), and the measurement of CRE pressure as required by Specification 6.5.17.d, shall be considered met. Following implementation:

(a) The first performance of SR 6.5.17, in accordance with Specification 6.5.17.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 4.0.2, as measured from April 17, 2004, the date of the most recent successful tracer gas test, as stated in the October 8, 2004 letter response to Generic Letter 2003–01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.

(b) The first performance of the periodic assessment of CRE habitability, Specification 6.5.17.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 4.0.2, as measured from April 17, 2004, the date of the most recent successful tracer gas test, as stated in the October 8, 2004 letter response to Generic Letter 2003–01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.

(c) The first performance of the periodic measurement of CRE pressure, Specification 6.5.17.d, shall be within 18 months, plus the 138 days allowed by SR 4.0.2, as measured from August 13, 2008, the date of the most recent successful pressure measurement test, or within 138 days if not performed previously.

Attachment 3

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Changes to Technical Specifications Bases 3 / 4.7.6.1

BASES

3/4.7.6.1 Control Room Emergency Air Filtration System

Surveillance Requirements

g. This SR verifies the OPERABILITY of the CRE boundary by testing for unfiltered air inleakage past the CRE boundary and into the CRE. The details of the testing are specified in the Control Room Envelope Habitability Program.

The CRE is considered habitable when the radiological dose to CRE occupants calculated in the licensing basis analyses of DBA consequences is no more than 5 rem TEDE and the CRE occupants are protected from hazardous chemicals and smoke. This SR verifies that the unfiltered air inleakage into the CRE is no greater than the flow rate assumed in the licensing basis analyses of DBA consequences. When unfiltered air inleakage is greater than the assumed flow rate, Action b must be entered. Action b.3 allows time to restore the CRE boundary to OPERABLE status provided mitigating actions can ensure that the CRE remains within the licensing basis habitability limits for the occupants following an accident. Compensatory measures are discussed in Regulatory Guide 1.196, Section C.2.7.3, (Ref. 1) which endorses, with exceptions, NEI 99-03, Section 8.4 and Appendix F (Ref. 2). These compensatory measures may also be used as mitigating actions as required by Action b.2. Temporary analytical methods may also be used as compensatory measures to restore OPERABILITY (Ref. 3). Options for restoring the CRE boundary to OPERABLE status include changing the licensing basis DBA consequence analysis, repairing the CRE boundary, or a combination of these actions. Depending upon the nature of the problem and the corrective action, a full scope inleakage test may not be necessary to establish that the CRE boundary has been restored to OPERABLE status.

References

1. Regulatory Guide 1.196
2. NEI 99-03, "Control Room Habitability Assessment," June 2001.
3. Letter from Eric J. Leeds (NRC) to James W. Davis (NEI) dated January 30, 2004, "NEI Draft White Paper, Use of Generic Letter 91-18 Process and Alternative Source Terms in the Context of Control Room Habitability." (ADAMS Accession No. ML040300694).

PLANT SYSTEMS

BASES

3/4.7.6.3 and 3/4.7.6.4 CONTROL ROOM AIR TEMPERATURE

Maintaining the control room air temperature less than or equal to 80°F ensures that (1) the ambient air temperature does not exceed the allowable air temperature for continuous duty rating for the equipment and instrumentation in the control room, and (2) the control room will remain habitable for operations personnel during plant operation.

The Air Conditioning System is designed to cool the outlet air to approximately 55°F. Then, non-safety-related near-room heaters add enough heat to the air stream to keep the rooms between 70 and 75°F. Although 70 to 75°F is the normal control band, it would be too restrictive as an LCO. Control Room equipment was specified for a more general temperature range to 45 to 120°F. A provision for the CPC microcomputers, which might be more sensitive to heat, is not required here. Since maximum outside air make-up flow in the normal ventilation mode comprises less than ten percent of the air flow from an AH-12 unit, outside air temperature has little affect on the AH-12s cooling coil heat load. Therefore, the ability of an AH-12 unit to maintain control room temperature in the normal mode gives adequate assurance of its capability for emergency situations.

The ACTION to suspend all operations involving movement of irradiated fuel assemblies shall not preclude completion of movement to a safe conservative position.

DELETED

3/4.7.6.5 CONTROL ROOM ISOLATION AND PRESSURIZATION

This specification provides the operability requirements for the control room envelope isolation and pressurization boundaries. The Limiting Condition for Operation (LCO) specifies specific ACTION STATEMENTS for inoperable components of the control room ventilation systems, separate from the S-8 and AH-12 units. The operability of the remaining parts of the system affect the ability of the control room envelope to pressurize.

ACTION STATEMENTS a and b focus on maintaining isolation characteristics. The valves in the flow path referred to in ACTION a are [illegible] The Outside Air Intake (OAI) "series isolation valves" of ACTION b and c are as follows:

NORTH OAI - HVC-202B & HVC-201A
HVC-202A & HVC-201B

SOUTH OAI - HVC-204B & HVC-203A
HVC-204A & HVC-203B

PLANT SYSTEMS

BASES

DELETED

3/4.7.8.5 CONTROL ROOM ISOLATION AND PRESSURIZATION (Continued)

ACTION STATEMENT c preserves the operator action (i.e., manually initiated filtered pressurization) that maintains the control room envelope at a position pressure during a radiological emergency. As indicated above each OAI series isolation valve is powered by the opposite train. With more than one OAI flow path inoperable a single failure (i.e., train A or B) could prohibit the ability to maintain the control envelope at a positive pressure. Therefore, in the specified condition, ACTION c requires an additional flow path to be returned to service within 7 days.

ACTION STATEMENT d.2.a is intended to address an intentional breach in the control room pressurization boundary as necessary to support maintenance or modification. A breach of this nature shall be limited in size and governed under administrative controls. The size restrictions as stated in the ACTION are such that should a toxic event occur control room integrity can be immediately restored as described below. ACTION STATEMENT d.2.b is intended to restore pressurization ability as soon as possible for unintended breaches in the envelope. The 48 hours to locate an unidentified breach is based on an evaluation that considered troubleshooting tasks that would be performed as necessary should the integrity of the Control Room Envelope pressure boundary fall into question. Estimated times associated with each task were based on sound engineering judgement. The ACTION statements also recognize the MODE-independent nature of the toxic chemical threat and provides for operator protection in the event of a toxic chemical release concurrent with a breach in the control room envelope. In addition, provisions have been added to the specification that, in the event of a toxic chemical event that threatens control room habitability while in the ACTION statements, "immediate steps" will be initiated to place the plant in a safe condition. In this context, the phrase "immediate steps" is taken to mean that the operators should immediately take reasonable action to restore a known breach in the envelope to an air-tight condition. Amplifying instructions are provided in Waterford 3 Administrative procedures, which impose special controls for work that will breach the control room envelope.

The ACTION to suspend all operations involving movement of irradiated fuel assemblies shall not preclude completion of movement to a safe conservative position.

3/4.7.7 CONTROLLED VENTILATION AREA SYSTEM

The OPERABILITY of the controlled ventilation area system ensures that radioactive materials leaking from the penetration area or the ECCS equipment within the pump room following a LOCA are filtered prior to reaching the environment. The operation of this system and the resultant effect on offsite dosage calculations was assumed in the safety analyses.

Attachment 4

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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 evaluation criteria that will be used for the SR along with amplifying information on the TS actions to be completed when the evaluation criteria is not met will be included in the TS Bases and will be consistent with TSTF-448. The TS Bases will be changed concurrent with the implementation of the LAR and changed via the TS Bases Control Program.	x		120 days following approval of the License Amendment.