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Donna Jacobs
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Waterford 3

W3F1-2011-0018

November 21, 2011

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

Subject: License Amendment Request to Relocate Technical Specifications to
the Technical Requirements Manual
Waterford Steam Electric Station Unit 3
Docket No. 50-382
License No. NPF-38

REFERENCES:

1. NUREG-1432 Revision 3, Combustion Engineering Standard Technical Specifications.
2. NRC ADMINISTRATIVE LETTER 98-10, "Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety", December 29, 1998.

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests the following amendment for Waterford Steam Electric Station Unit 3 (Waterford 3). The proposed change will relocate the following Technical Specifications (TS) to the Waterford 3 Technical Requirements Manual:

TS 3.4.6 (Chemistry)
TS 3.7.5 (Flood Protection)
TS 3.7.9 (Sealed Source Contamination)
TS 3.9.5 (Communications)

TS 3.7.5 was identified to be non-conservative with respect to the implementation of flood protection actions. Waterford 3 has implemented administrative controls, in accordance with NRC Administrative letter 98-10 [Reference 2], to apply revised action timing until the NRC completes its review and approval. During the TS 3.7.5 change evaluation, it was determined that the optimal change process would be to

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upgrade to the NUREG-1432 [Reference 1] standards and to obtain consistency with the current Technical Specifications 10CFR50.36 requirements.

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

The proposed change includes one new commitment (attachment 2).

Entergy requests approval of the proposed amendment by November 21, 2012. Once approved, the amendment shall be implemented within 90 days.

If you have any questions or require additional information, please contact the licensing manager, William Steelman, at 504-739-6685.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 21, 2011.

Sincerely,

 for Donna Jacobs 11/21/11

DJ/WJS/ssf

Attachments:

1. Analysis of Proposed Technical Specification Change
2. Licensee Identified Commitments
2. Proposed Technical Specification Changes (mark-up)
3. Proposed Technical Specification Changes (clean copy)

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**Attachment 1
to
W3F1-2011-0018**

Analysis of Proposed Technical Specification Change

1.0 DESCRIPTION

This letter is a request to amend Operating License No. NPF-38 for Waterford Steam Electric Station Unit 3 (Waterford 3).

Technical Specification (TS) 3.7.5 was identified to be non-conservative with respect to the implementation of flood protection actions. Waterford 3 has implemented administrative controls, in accordance with NRC Administrative letter 98-10 [Reference 7.11], to apply revised action timing until the NRC completes its review and approval. During the TS 3.7.5 change evaluation, it was determined that the optimal change process would be to upgrade to the NUREG-1432 [Reference 7.10] standards and to obtain consistency with the current Technical Specifications 10CFR50.36 requirements. The TS 3.7.5 evaluation also identified three additional TSs that met the same upgrade criteria.

2.0 PROPOSED CHANGE

The proposed change will relocate the following TSs to the Waterford 3 Technical Requirements Manual (TRM):

TS 3.4.6 (Chemistry)
TS 3.7.5 (Flood Protection)
TS 3.7.9 (Sealed Source Contamination)
TS 3.9.5 (Communications)

The Updated Final Safety Analysis Report (UFSAR) Section 13.7 describes that the TRM is intended for use as an operator aid that provides one location for all relocated items in a familiar format. In addition to retaining the current TS numbering and format for relocated items, the TRM provides a reference to the TS when appropriate to assist the user in connecting the relocated information to the applicable TS. The TRM is part of the UFSAR and any changes to the TRM are subject to the criteria of 10CFR50.59.

3.0 BACKGROUND

Section 182a of the Atomic Energy Act requires applicants for nuclear power plant operating licenses to include TSs as part of the license. In Section 50.36 of Title 10 of the Code of Federal Regulations (10CFR50.36), the commission established the regulatory requirements related to the content of TSs. That regulation requires that the TSs include items in five specific categories, including (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in TSs.

On February 6, 1987, the Commission issued its Interim Policy Statement on Technical Specification Improvements (52FR3788) [Reference 7.3]. The Policy Statement encouraged the industry to develop new Standard Technical Specifications (STS) to be used as guides for licensees in preparing improved TS for their facilities. The Interim Policy Statement contained criteria (including a discussion of each) for determining which regulatory requirements and operating restrictions should be retained in the new STS and ultimately in plant TS. It also identified four additional systems that are to be retained on the basis of operating experience and probabilistic risk assessments (PRA). Finally, the Policy Statement indicated that risk evaluations are an appropriate tool for defining requirements that should be retained in the STS/TS where including such requirements is consistent with the purpose of TS (as stated in the Policy Statement). Requirements that are not retained in the new STS would generally not be retained in individual plant TS. Current TS requirements not retained in the STS will be relocated to other licensee controlled documents.

The Combustion Engineering Owner's Group (CEOG) initiated a program to restructure the STS in order to develop improved model TSs for CEOG plants. Key elements of the project were 1) the application of selection criteria to the present set of standard technical specifications to determine which individual requirements remain in a plant's operating license, 2) a general rewriting of all specifications to a new format with a human factors-oriented writing style, and 3) the development of improved bases. The Restructured Standard Technical Specification (RSTS) program was undertaken in anticipation of a voluntary industry program to improve technical specifications. This endorsement came in the February 6, 1987 Commission Policy Statement on TS Improvements (52FR3788) [Reference 7.3].

The CEOG report CEN-355 Volume I (CE Owners Group Restructured Standard Technical Specifications) [Reference 7.8] was submitted to the NRC to obtain approval of the Interim Policy Statement Criteria application. CEN-355 Volume I was approved by Thomas E. Murley (NRC) letter dated May 9, 1988 [Reference 7.9].

CEN-355 Volume I and NRC approval demonstrated that the TS LCOs for Chemistry, Flood Protection, Sealed Source Contamination, and Communications met the criteria to be relocated to a licensee controlled document.

Subsequently, the NRC developed final criteria in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (58FR39132) [Reference 7.4], to determine which of the design conditions and associated surveillances should be located in the TSs as limiting conditions for operation. Four criteria were subsequently incorporated into the regulations by an amendment to 10CFR50.36 (60FR36953) [Reference 7.5]:

- Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary;
- Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- Criterion 4. A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

The Commission's Final Policy Statement and documentation related to the revision of 10CFR50.36 acknowledged that implementation of these criteria may cause some requirements presently in TSs to be moved out of existing TSs to documents and programs controlled by licensees.

NUREG-1432 (Combustion Engineering Standard Technical Specifications) [Reference 7.10] was updated with respect to the TS Final Policy Statement. NUREG-1432 does not contain the TS LCOs for Chemistry, Flood Protection, Sealed Source Contamination, and Communications. This submittal addresses the relocation of these selected TS LCOs as a result of applying the 10CFR50.36 criteria.

4.0 TECHNICAL ANALYSIS

The CEOG CEN-355 report demonstrated that the TS LCOs for Chemistry, Flood Protection, Sealed Source Contamination, and Communications met the criteria to be relocated to a licensee controlled document on a generic basis. These TS LCOs are not contained in NUREG-1432. This section will evaluate each selected Waterford 3 TS LCO with respect to the four 10CFR50.36 criteria to validate the basis for the relocation to the TRM.

TS 3.4.6 (Chemistry)

The limitations on Reactor Coolant System chemistry ensure that corrosion of the Reactor Coolant System is minimized and reduces the potential for Reactor Coolant System leakage or failure due to stress corrosion. Maintaining the chemistry within Steady State Limits provides adequate corrosion protection to ensure the structural integrity of the Reactor Coolant System over the life of the plant. The associated effects of exceeding the oxygen, chloride and fluoride limits are time and temperature dependent. Corrosion studies show that operation may be continued with contaminant concentration levels in excess of the Steady State Limits, up to the Transient Limits, for the specified limited time intervals without having a significant effect on the structural integrity of the Reactor Coolant System. The time interval permitting continued operation within the restrictions of the Transient Limits provides time for taking corrective actions to restore the contaminant concentrations to within Steady State Limits.

Comparison to Screening Criteria:

Criterion 1. Criterion 1 refers to installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. While poor chemistry control can lead to a more rapid degradation of the primary materials, this type of degradation is a long-term process; furthermore, poor Reactor Coolant System (RCS) chemistry control is a cause of, not a detector or indicator of RCS degradation. The inservice inspections required by 10CFR50.55a and the RCS leakage limits are examples of requirements provided to monitor degradation of the RCS boundary materials. Therefore, TS 3.4.6 does not meet Criterion 1 for inclusion in the TSs.

Criterion 2. Criterion 2 refers to a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier. Neither reactor coolant chlorides, fluorides, nor dissolved oxygen are assumed as initial conditions for any design basis accident that would present a challenge to the integrity of any fission product barrier. While reactor coolant chemistry is important to the maintenance of the integrity of the RCS, the degradation caused by poor

water chemistry control occurs long term. Therefore, TS 3.4.6 does not meet Criterion 2 for inclusion in the TSs.

Criterion 3. Criterion 3 refers to a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier. Reactor coolant system chemistry is not part of the primary success path in the mitigation of a design basis accident or transient. Therefore, TS 3.4.6 does not meet Criterion 3 for inclusion in the TSs.

Criterion 4. Criterion 4 refers to a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. Neither of these criteria are applicable to limits on reactor coolant chlorides, fluorides, or dissolved oxygen. Therefore, TS 3.4.6 does not meet either Criterion 4 for inclusion in the TSs.

Conclusion:

Since the screening criteria have not been satisfied, the Reactor Coolant System Chemistry LCO and Surveillances may be relocated to the Waterford 3 TRM.

TS 3.7.5 (Flood Protection)

The limitation on flood protection ensures that facility protective actions will be taken in the event of flood conditions. The limit of elevation +27.0 ft Mean Sea Level is based on the maximum elevation at which the levee provides protection, the nuclear plant island structure provides protection to safety-related equipment up to elevation approximately +30 ft Mean Sea Level.

After NRC approval of the TS 3.7.5 LCO to the TRM, the 10CFR50.59 process will be used to resolve the identified non-conservatism.

Comparison to Screening Criteria:

Criterion 1. Criterion 1 refers to installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. While flood protection is important to ensure safety related equipment is protected, flood protection is not a detector or indicator of RCS degradation. The inservice inspections required by 10CFR50.55a and the RCS leakage limits are examples of requirements provided to monitor degradation of the RCS boundary materials. Therefore, TS 3.7.5 does not meet Criterion 1 for inclusion in the TSs.

Criterion 2. Criterion 2 refers to a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier. The "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors"

(58FR39132) defines the design basis accident or transients as that contained in the UFSAR Chapter 6 and 15. The flood related events are contained in UFSAR Chapter 2 and 3. Thus flood protection is not an initial condition for any design basis accident that would present a challenge to the integrity of any fission product barrier. Therefore, TS 3.7.5 does not meet Criterion 2 for inclusion in the TSs.

Criterion 3. Criterion 3 refers to a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier. Flood protection is not part of the primary success path in the mitigation of a design basis accident or transient. Therefore, TS 3.7.5 does not meet Criterion 3 for inclusion in the TSs.

Criterion 4. Criterion 4 refers to a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. The Waterford 3 Individual Plant Examination for External Events (IPEEE) response [Reference 7.12] found no high winds, floods, or off site industrial facility accidents that significantly alters the Waterford 3 estimate of either the core damage frequency, or the distribution of containment release categories. The NRC IPEEE safety evaluation [Reference 7.13] reiterated this information as the licensee stated that Waterford 3 complies with the 1975 Standard Review Plan (SRP) criteria. Based on this compliance, all of the high winds, floods, transportation, and other (HFO) external events were dropped from further consideration and judged to not be a significant contributor to the total Core Damage Frequency (CDF). Based upon these risk insights, TS 3.7.5 does not meet Criterion 4 for inclusion in the TSs.

Conclusion:

Since the screening criteria have not been satisfied, the Flood Protection LCO and Surveillances may be relocated to the Waterford TRM.

TS 3.7.9 (Sealed Source Contamination)

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10CFR70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values. These limits are not related to operation or safe shutdown of the plant.

Comparison to Screening Criteria:

Criterion 1. Criterion 1 refers to installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. Limitations on sealed sources

containing radioactive material are not used for, nor capable of, detecting a significant abnormal degradation of the RCS pressure boundary prior to any design basis accident (DBA). The inservice inspections required by 10CFR50.55a and the RCS leakage limits are examples of requirements provided to monitor degradation of the RCS boundary materials. Therefore, TS 3.7.9 does not meet Criterion 1 for inclusion in the TSs.

Criterion 2. Criterion 2 refers to a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier. Limitations on sealed sources containing radioactive material are not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. Therefore, TS 3.7.9 does not meet Criterion 2 for inclusion in the TSs.

Criterion 3. Criterion 3 refers to a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier. Limitations on sealed sources containing radioactive material are not part of the primary success path in the mitigation of a DBA or transient. Therefore, TS 3.7.9 does not meet Criterion 3 for inclusion in the TSs.

Criterion 4. Criterion 4 refers to a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. Neither of these criteria are applicable to limitations on sealed sources containing radioactive material. Therefore, TS 3.7.9 does not meet either Criterion 4 for inclusion in the TSs.

Conclusion:

Since the screening criteria have not been satisfied, the Sealed Source Contamination LCO and Surveillances may be relocated to the Waterford 3 TRM.

TS 3.9.5 (Communications)

Communication between the control room personnel and personnel performing CORE ALTERATIONS is maintained to ensure that personnel can be promptly informed of significant changes in the plant status or core reactivity condition during refueling. The communications allow for coordination of activities that require interaction between the control room and refuel personnel. However, the fuel handling accident or transient response does not take credit for this communication.

Comparison to Screening Criteria:

Criterion 1. Criterion 1 refers to installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. LCO 3.9.5 is applicable only during

CORE ALTERATIONS, which can only be conducted with the reactor head removed and the reactor coolant system depressurized. The components covered by this LCO include radios and associated power and transmission equipment necessary to establish and maintain communications between the control room and the refueling station. The communications system is not used for, nor capable of, detecting a significant abnormal degradation of the RCS pressure boundary prior to any design basis accident (DBA).

Therefore, TS 3.9.5 does not meet Criterion 1 for inclusion in the TSs.

Criterion 2. Criterion 2 refers to a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier. The communications system is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient.

Therefore, TS 3.9.5 does not meet Criterion 2 for inclusion in the TSs.

Criterion 3. Criterion 3 refers to a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier. Equipment used by personnel to establish and maintain communication between the control room and the refueling station does not include any systems, structures, or components that perform the design functions described in this criterion.

Therefore, TS 3.9.5 does not meet Criterion 3 for inclusion in the TSs.

Criterion 4. Criterion 4 refers to a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. Neither of these criteria are applicable to the refueling communications equipment. Therefore, TS 3.9.5 does not meet either Criterion 4 for inclusion in the TSs.

Conclusion:

Since the screening criteria have not been satisfied, the Communication LCO and Surveillances may be relocated to the Waterford 3 TRM.

5.0 REGULATORY ANALYSIS

5.1 Applicable Regulatory Requirements/Criteria

In general, Technical Specifications are based upon the accident analyses. The accident analyses assumptions and initial conditions must be protected by the Technical Specifications. This is a requirement as outlined in 10CFR50.36.

10CFR50.36(b) states the technical specifications will be derived from the analyses and evaluation included in the safety analysis report.

The technical evaluation demonstrated that the 10CFR50.36(c)(2)(ii) criteria were not met and the relocation to the TRM is allowable.

In conclusion, Waterford 3 has determined that the proposed change does not require any exemptions or relief from regulatory requirements and does not affect conformance with any GDC differently than described in the Updated Final Safety Analysis Report (UFSAR).

5.2 No Significant Hazards Consideration

Waterford 3 has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10CFR50.92, "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.

This proposed change relocates Technical Specifications (TS) 3.4.6 (Chemistry), TS 3.7.5 (Flood Protection), TS 3.7.9 (Sealed Source Contamination), and TS 3.9.5 (Communications) to the Waterford 3 Technical Requirements Manual (TRM). This is consistent with the requirements of 10CFR50.36(c)(2)(ii) and aligns with NUREG-1432 (Combustion Engineering Standard Technical Specifications).

Each TS relocation was evaluated against the 10CFR50.36(c)(2)(ii) criteria to demonstrate no impact on the design basis accident or probability. Consequently, this 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 TS 3.4.6 (Chemistry), TS 3.7.5 (Flood Protection), TS 3.7.9 (Sealed Source Contamination), and TS 3.9.5 (Communications) relocation to the Waterford 3 TRM does not change any of the controls necessary for design basis accident initiation or mitigation. The proposed change is allowable because the evaluation against the 10CFR50.36(c)(2)(ii) criteria shows no impact. This provides assurance that the design basis accidents will remain within their initial assumptions and consequently, there is no possibility of a new or different kind of accident due to this change.

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

Response: No.

The proposed TS 3.4.6 (Chemistry), TS 3.7.5 (Flood Protection), TS 3.7.9 (Sealed Source Contamination), and TS 3.9.5 (Communications) relocation to the Waterford 3 TRM will not affect protection criterion for plant equipment and will not reduce the margin of safety. The Waterford 3 TRM requires the 10CFR50.59 process be entered for any corresponding change, thus maintaining the required margin of safety. Consequently, there is no significant reduction in a margin of safety due to this change.

5.3 Environmental Considerations

The proposed amendment does not change any requirements with respect to the installation of or use of a facility component located within the restricted area, as defined in 10CFR20, or change any inspection or surveillance requirement. The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amount of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10CFR51.22(c)(9). Therefore, pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 PRECEDENCE

NUREG-1432 has already relocated TS 3.4.6 (Chemistry), TS 3.7.5 (Flood Protection), TS 3.7.9 (Sealed Source Contamination), and TS 3.9.5 (Communications) to a licensee controlled document.

7.0 REFERENCES

- 7.1 Technical Specifications.
- 7.2 Updated Final Safety Analysis Report (UFSAR).
- 7.3 52FR3788, Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors, February 6, 1987.
- 7.4 58FR39132, Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, July 22, 1993.
- 7.5 60FR36953, Technical Specification, July 19, 1995.
- 7.6 NUREG-212 Revision 2, Combustion Engineering Standard Technical Specifications, Fall 1980.
- 7.7 NUREG-212 Revision 3 Draft, Combustion Engineering Standard Technical Specification, December 1981.
- 7.8 CEN-355, Combustion Engineering Restructured Standard Technical Specifications, December 1987.
- 7.9 NRC Staff Review of Nuclear Steam Supply System Vendor Owners Groups Application of the Commission's Interim Policy Statement Criteria to Standard Technical Specifications, May 9, 1988 [ADAMS Accession Number ML11264A057].
- 7.10 NUREG-1432 Revision 3, Standard Technical Specifications Combustion Engineering Plants, June 2004 [ADAMS Accession Number ML032050142].
- 7.11 NRC ADMINISTRATIVE LETTER 98-10, Dispositioning of Technical Specifications That Are Insufficient to Assure Plant Safety, December 29, 1998.
- 7.12 W3F1-95-0117, Response to Generic Letter 88-20 Supplement 4, Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities, July 28, 1995.
- 7.13 NRC SAFETY EVALUATION OF LICENSEE RESPONSE TO GENERIC LETTER 88-20, SUPPLEMENT 4, "INDIVIDUAL PLANT EXAMINATION FOR SEVERE ACCIDENT VULNERABILITIES," (TAC NO. M83692), July 27, 2000.

**Attachment 2
to
W3F1-2011-0018**

Licensee Identified Commitments

Licensee Identified Commitments

This table identifies actions discussed in this letter for which Entergy commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are **not** commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
The proposed change will relocate the following TSs to the Waterford 3 Technical Requirements Manual (TRM): TS 3.4.6 (Chemistry) TS 3.7.5 (Flood Protection) TS 3.7.9 (Sealed Source Contamination) TS 3.9.5 (Communications)	X		Prior to implementing Technical Specification change

**Attachment 3
to
W3F1-2011-0018**

Proposed Technical Specification Changes (mark-up)

REACTOR COOLANT SYSTEM

DELETE

3/4.4.6 CHEMISTRY

LIMITING CONDITION FOR OPERATION

3.4.6 The Reactor Coolant System chemistry shall be maintained within the limits specified in Table 3.4-2.

APPLICABILITY: At all times.

ACTION:

MODES 1, 2, 3, and 4:

- a. With any one or more chemistry parameter in excess of its Steady State Limit but within its Transient Limit, restore the parameter to within its Steady State Limit within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- a. With any one or more chemistry parameter in excess of its Transient Limit, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.

At All Other Times:

With the concentration of either chloride or fluoride in the Reactor Coolant System in excess of its Steady State Limit for more than 24 hours or in excess of its Transient Limit, reduce the pressurizer pressure to less than or equal to 500 psia, if applicable, and perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the Reactor Coolant System; determine that the Reactor Coolant System remains acceptable for continued operation prior to increasing the pressurizer pressure above 500 psia or prior to proceeding to MODE 4.

SURVEILLANCE REQUIREMENTS

4.4.6 The Reactor Coolant System chemistry shall be determined to be within the limits by analysis of those parameters at the frequencies specified in Table 4.4-3.

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TABLE 3.4-2
REACTOR COOLANT SYSTEM

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CHEMISTRY

<u>PARAMETER</u>	<u>STEADY STATE LIMIT</u>	<u>TRANSIENT LIMIT</u>
DISSOLVED OXYGEN*	≤ 0.10 ppm	≤ 1.00 ppm
CHLORIDE	≤ 0.15 ppm	≤ 1.50 ppm
FLUORIDE	≤ 0.10 ppm	≤ 1.00 ppm

*Limit not applicable with T_{avg} less than or equal to 250°F.

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TABLE 4.4-3
REACTOR COOLANT SYSTEM
CHEMISTRY LIMITS SURVEILLANCE REQUIREMENTS

<u>PARAMETER</u>	<u>SAMPLE AND ANALYSIS FREQUENCY</u>
DISSOLVED OXYGEN*	At least once per 72 hours
CHLORIDE	At least once per 72 hours
FLUORIDE	At least once per 72 hours

DELETE

*Not required with T_{avg} less than or equal to 250°F

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PLANT SYSTEMS

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3/4.7.5 FLOOD PROTECTION

LIMITING CONDITION FOR OPERATION

3.7.5 Flood protection shall be provided for all safety-related systems, components, and structures when the water level of the Mississippi River exceeds +27.0 ft Mean Sea Level USGS datum, at the levee fronting the Waterford Unit 3 site.

APPLICABILITY: At all times.

ACTION:

With the water level at the levee fronting the Waterford Unit 3 site above elevation +27.0 ft Mean Sea Level USGS datum initiate and complete within 12 hours procedures ensuring that all doors and penetrations below the +30.0 ft elevation are secure.

SURVEILLANCE REQUIREMENTS

4.7.5 The water level at the levee fronting the Waterford Unit 3 site shall be determined to be within the limits by:

- a. Measurement at least once per 24 hours when the water level is equal to or above elevation +24.0 ft Mean Sea Level USGS datum and below elevation +27.0 ft Mean Sea Level USGS datum, and
- b. Measurement at least once per 2 hours when the water level is equal to or above elevation +27.0 ft Mean Sea Level USGS datum.

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PLANT SYSTEMS

3/4.7.9 SEALED SOURCE CONTAMINATION

LIMITING CONDITION FOR OPERATION

3.7.9 Each sealed source containing radioactive material either in excess of 100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material shall be free of greater than or equal to 0.005 microcurie of removable contamination.

APPLICABILITY: At all times.

DELETE

ACTION:

- a. With a sealed source having removable contamination in excess of the above limit, immediately withdraw the sealed source from use and either:
 - 1. Decontaminate and repair the sealed source, or
 - 2. Dispose of the sealed source in accordance with Commission Regulations.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.9.1 Test Requirements - Each sealed source shall be tested for leakage and/or contamination by:

- a. The licensee, or
- b. Other persons specifically authorized by the Commission or an Agreement State.

The test method shall have a detection sensitivity of at least 0.005 microcurie per test sample.

4.7.9.2 Test Frequencies - Each category of sealed sources (excluding startup sources and fission detectors previously subjected to core flux) shall be tested at the frequencies described below.

- a. Sources in use - At least once per 6 months for all sealed sources containing radioactive material:
 - 1. With a half-life greater than 30 days (excluding Hydrogen 3), and
 - 2. In any form other than gas.

PLANT SYSTEMS

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SURVEILLANCE REQUIREMENTS (Continued)

- b. Stored sources not in use - Each sealed source and fission detector shall be tested prior to use or transfer to another licensee unless tested within the previous 6 months. Sealed sources and fission detectors transferred without a certificate indicating the last test date shall be tested prior to being placed into use.
- c. Startup sources and fission detectors - Each sealed startup source and fission detector shall be tested within 31 days prior to being subjected to core flux or installation and following repair or maintenance to the source or detector.

4.7.9.3 Reports - A report shall be prepared and submitted to the Commission on an annual basis if sealed source or fission detector leakage tests reveal the presence of greater than or equal to 0.005 microcurie of removable contamination.

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REFUELING OPERATIONS

3/4.9.5 COMMUNICATIONS

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LIMITING CONDITION FOR OPERATION

3.9.5 Direct communications shall be maintained between the control room and personnel at the refueling station.

APPLICABILITY: During CORE ALTERATIONS.

ACTION:

When direct communications between the control room and personnel at the refueling station cannot be maintained, suspend all CORE ALTERATIONS.

SURVEILLANCE REQUIREMENTS

4.9.5 Direct communications between the control room and personnel at the refueling station shall be demonstrated within 1 hour prior to the start of and at least once per 12 hours during CORE ALTERATIONS.

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**Attachment 4
to
W3F1-2011-0018**

Proposed Technical Specification Changes (clean copy)

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