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W3F1-2014-0061

October 1, 2014

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

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 4, Standard Technical Specifications Combustion Engineering Plants, April 2012 [ADAMS Accession Number ML12102A165].

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 3.9.6 (Refuel Machine)
TS 3.9.7 (Crane Travel)

Waterford 3 is planning to upgrade the refuel machine to improve reliability and outage performance. This upgrade required Waterford 3 to perform a change evaluation. TS 3.9.6 was determined to be potentially impacted. In order to resolve the potential impact, Waterford 3 is requesting an upgrade to the NUREG-1432 [Reference 1] standards and to obtain consistency with the current 10 CFR 50.36 requirements. This TS evaluation also identified one additional TS that meets the same upgrade criteria.

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 commitment (Attachment 4).

Entergy requests approval of the proposed amendment by October 1, 2015. Once approved, the amendment shall be implemented within 60 days.

If you have any questions or require additional information, please contact John Jarrell, Regulatory Assurance Manager, at 504-739-6685.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 1, 2014.

Sincerely,

MRC/JPJ/wjs

Attachments:

1. Analysis of Proposed Technical Specification Change
2. Markups of Technical Specification Pages
3. Clean (Revised) Technical Specification Pages
4. List of Regulatory Commitments

cc: Mr. Marc L. Dapas
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Attachment 1 to

W3F1-2014-0061

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).

Waterford 3 is planning to upgrade the refuel machine to improve reliability and outage performance. This upgrade required Waterford 3 to perform a change evaluation. Technical Specification (TS) 3.9.6 (Refuel Machine) was determined to be potentially impacted. In order to resolve the potential impact, Waterford 3 is requesting an upgrade to the NUREG-1432 [Reference 7.10] standards and to obtain consistency with the current Technical Specifications 10CFR50.36 requirements. The TS evaluation also identified one additional TS that meets 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 3.9.6 (Refuel Machine)
TS 3.9.7 (Crane Travel)

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.

Once TS 3.9.6 (Refuel Machine) has been relocated to the TRM, any changes due to the refuel machine upgrade will be addressed using the 10CFR50.59 process.

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 TS 3.9.6 (Refuel Machine) and TS 3.9.7 (Crane Travel) 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 TS 3.9.6 (Refuel Machine) and TS 3.9.7 (Crane Travel). 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 TS 3.9.6 (Refuel Machine) and TS 3.9.7 (Crane Travel) 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 3.9.6 (Refuel Machine)

The requirements for the refueling machine ensure that the refueling machine will be used for movement of CEAs and fuel assemblies, each hoist has sufficient load capacity to lift a CEA or fuel assembly, and the core internals and pressure vessel are protected from excessive lifting force in the event they are inadvertently engaged during lifting operations.

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 the refuel machine is important to ensure safe fuel movements, the refuel machine is not a detector or indicator of RCS degradation. Therefore, TS 3.9.6 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. The applicable design basis accident is the Fuel Handling Accident (FHA) described in the Updated Final Safety Analysis Report (UFSAR) Section 15.7.3.4. The FHA was submitted to the NRC in Entergy Letter W3F1-2010-0009 [Reference 7.11] and approved in NRC Amendment 235 [Reference 7.12]. The limiting FHA results in all the fuel pins in the dropped and impacted fuel assemblies failing (472 pins or 236 per assembly). The analysis assumes that a fuel assembly is dropped as an initial condition. The refuel machine does not prevent the accident conditions from occurring or limit the severity of the accident. Thus, the refuel machine does not impact the initial conditions assumed in the accident analysis. Therefore, TS 3.9.6 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. The applicable design basis accident is the Fuel Handling Accident (FHA) described in the Updated Final Safety Analysis Report (UFSAR) Section 15.7.3.4. The FHA was submitted to the NRC in Entergy Letter W3F1-2010-0009 [Reference 7.11] and approved in NRC Amendment 235 [Reference 7.12]. The limiting FHA results in all the fuel pins in the dropped and impacted fuel assemblies failing (472 pins or 236 per assembly). The analysis assumes that a fuel assembly is dropped as an initial condition. The refuel machine does not mitigate any of the consequences. Therefore, TS 3.9.6 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. Since the refuel machine is not required to respond, mitigate, or terminate any design basis accident, this change will not adversely impact the likelihood or probability of a design basis accident. This also means that design basis accidents consequences will not change so the public health and safety will not be significantly impacted. TS 3.9.6 does not meet Criterion 4 for inclusion in the TSs.

Conclusion:
Since the screening criteria have not been satisfied, the refuel machine LCO and surveillances may be relocated to the Waterford 3 TRM.

TS 3.9.7 (Fuel Handling Building Crane Travel)

The fuel handling building crane travel requirements protect against load movements with or over irradiated fuel assemblies that could cause fuel assembly damage.

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 the spent fuel handling building cranes are important to ensure safe fuel movements, the cranes are not a detector or indicator of RCS degradation. Therefore, TS 3.9.7 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 applicable design basis accident is the Fuel Handling Accident (FHA) described in the Updated Final Safety Analysis Report (UFSAR) Section 15.7.3.4. The FHA was submitted to the NRC in Entergy Letter W3F1-2010-0009 [Reference 7.11] and approved in NRC Amendment 235 [Reference 7.12]. The limiting FHA results in all the fuel pins in the dropped and impacted fuel assemblies failing (472 pins or 236 per assembly). The analysis assumes that a fuel assembly is dropped as an initial condition. The spent fuel handling machine does not prevent the accident conditions from occurring and does not limit the severity of the accident. Thus, the cranes do not impact the initial conditions assumed in the accident analysis.

TS 3.9.7 also applies to the FHB cranes and their interlocks. Entergy letter W3F-2009-0046 [Reference 13] modified TS 3.9.7 to allow load movements over the transfer cask using a single failure proof handling system which was approved by the NRC in TS Amendment 227 [Reference 14]. The cranes have design features and operation restrictions in place to prevent exceeding the initial condition of dropping a load on to irradiated fuel that is stored in the spent fuel pool. These design features are not, in themselves, initial conditions of a design-basis accident. Similarly, the load limit is an operational restriction that is intended to prevent exceeding the initial condition (the maximum load capacity of the crane) of the design basis accident. The cranes, their interlocks, and the load limits are provided to prevent operation in a condition that could lead to an unanalyzed load drop accident. The SFH cranes do not impact the initial conditions assumed in the accident analysis. Therefore, TS 3.9.7 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. The applicable design basis accident is the Fuel Handling Accident (FHA) described in the Updated Final Safety Analysis Report (UFSAR) Section 15.7.3.4. The FHA was submitted to the NRC in Entergy Letter W3F1-2010-0009 [Reference 7.11] and approved in NRC Amendment 235 [Reference 7.12]. The limiting FHA results in all the fuel pins in the dropped and impacted fuel assemblies failing (472 pins or 236 per assembly). The analysis assumes that a fuel assembly is dropped as an initial condition. The spent fuel handling building cranes do not mitigate any of the consequences. Therefore, TS 3.9.7 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. Since the spent fuel handling building cranes are not required to respond, mitigate, or terminate any design basis accident, this change will not adversely impact the likelihood or probability of a design basis accident. This also means that design basis accidents consequences will not change so the public health and safety will not be significantly impacted. TS 3.9.7 does not meet Criterion 4 for inclusion in the TSs.

Conclusion:
Since the screening criteria have not been satisfied, the spent fuel handling building cranes 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) 3.9.6 (Refuel Machine) and TS 3.9.7 (Crane Travel) 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 3.9.6 (Refuel Machine) and TS 3.9.7 (Crane Travel) 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 3.9.6 (Refuel Machine) and TS 3.9.7 (Crane Travel) 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 3.9.6 (Refuel Machine) and TS 3.9.7 (Crane Travel) to a licensee controlled document.

NRC ADAMS search identified multiple utilities that have used a similar approach to relocate TS 3.9.6 and TS 3.9.7 to a licensee controlled document.

7.0 REFERENCES

7.1 Waterford Nuclear Generator Station Unit 3, Technical Specifications.
7.2 Waterford Nuclear Generator Station Unit 3, 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 4, Standard Technical Specifications Combustion Engineering Plants, April 2012 [ADAMS Accession Number ML12102A165].

7.11 W3F1-2010-0009, License Amendment Request to Revise the Technical Specifications Based Upon Revised Fuel Handling Accident Analysis, April 13, 2011 [ADAMS Accession Number ML11105A131].
7.12 NRC Letter, Waterford Steam Electric Station, Unit3 – Issuance of Amendment 235 Re: Request to Revise the Technical Specifications Based Upon a Revised Fuel Handling Accident Analysis, April 25, 2012 [ADAMS Accession Number ML120940171].
7.13 W3F1-2009-0046, License Amendment Request Modify Technical Specification 3/4.9.7, Crane Travel - Fuel Handling Building, September 9, 2009 [ADAMS Accession Number ML092540575].
7.14 NRC Letter, Waterford Steam Electric Station, Unit3 – Issuance of Amendment 227 Re: Modify Technical Specification 3/4.9.7 “Crane Travel – Fuel Handling Building”, September 13, 2010 [ADAMS Accession Number ML102150466].

Attachment 2 to

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Markups of WF3 Technical Specification Pages

(2 Pages)

REFUELING OPERATIONS

DELETE

3/4.9.6 REFUELING MACHINE

LIMITING CONDITION FOR OPERATION

3.9.6 The refueling machine shall be used for movement of CEAs or fuel assemblies and shall be OPERABLE with:

a. A minimum capacity of 3200 pounds, and an overload cut off limit of less than or equal to 3350 pounds for the fuel mast.

b. A minimum capacity of 1600 pounds and an overload cut off limit of less than or equal to 1700 pounds for the CEA mast.

APPLICABILITY: During movement of CEAs or fuel assemblies within the reactor pressure vessel.

ACTION:

a. With the above requirements for the fuel mast not satisfied, suspend use of the fuel mast from operations involving pre-planned movement of fuel assemblies, and place the refueling machine load (fuel assembly) in a safe condition.

b. With the above requirements for the CEA mast not satisfied, suspend use of the CEA mast from operations involving pre-planned movement of CEAs, and place the refueling machine load (CEA) in a safe condition.

SURVEILLANCE REQUIREMENTS

4.9.6.1 The fuel mast used for movement of fuel assemblies shall be demonstrated OPERABLE within 72 hours prior to the start of such operations by performing a load test of at least 3200 pounds and demonstrating an automatic load cut off when the fuel mast load exceeds 3350 pounds.

4.9.6.2 The CEA mast used for movement of CEAs shall be demonstrated OPERABLE within 72 hours prior to the start of such operations by performing a load test of at least 1600 pounds and demonstrating an automatic load cut off when the CEA mast exceeds 1700 pounds.

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REFUELING OPERATIONS

3/4.9.7 CRANE TRAVEL - FUEL HANDLING BUILDING

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LIMITING CONDITION FOR OPERATION

3.9.7 Cranes in the fuel handling building shall be restricted as follows:

a. The spent fuel handling machine shall be used* for the movement of fuel assemblies (with or without CEAs) and shall be OPERABLE with:

1. A minimum hoist capacity of 1800 pounds, and

2. An overload cutoff limit of less than or equal to 1900 pounds, and,

b. Loads in excess of 2000 pounds shall be prohibited from travel over irradiated fuel assemblies in the Fuel Handling Building, except over assemblies in a transfer cask using a single-failure-proof handling system.

APPLICABILITY: With irradiated fuel assemblies in the Fuel Handling Building.

ACTION:

a. With the spent fuel handling machine inoperable, suspend the use of the spent fuel handling machine for movement of fuel assemblies and place the crane load in a safe position.

b. With loads in excess of 2000 pounds over irradiated fuel assemblies in the Fuel Handling Building, except over assemblies in a transfer cask using a single-failure-proof handling system, place the crane load in a safe position.

c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.7.1 The spent fuel handling machine shall be demonstrated OPERABLE within 72 hours prior to the start of fuel assembly movement and at least once per 7 days thereafter by performing a load test of at least 1800 pounds and demonstrating the automatic load cutoff when the hoist load exceeds 1900 pounds.

4.9.7.2 The electrical interlock system which prevents crane main hook travel over irradiated fuel assemblies in the Fuel Handling Building, except over assemblies in a transfer cask using a single-failure-proof handling system, shall be demonstrated OPERABLE within 7 days prior to crane use and at least once per 7 days thereafter during crane operation. #

4.9.7.3 Administrative controls which prevent crane auxiliary hook travel with loads in excess of 2000 pounds over the irradiated fuel assemblies in the Fuel Handling Building shall be enforced during crane operations.

*Not required for movement of new fuel assemblies outside the spent fuel pool and Cask Storage Pit.

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Clean (Revised) WF3 Technical Specification Pages

(2 Pages)

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Attachment 4 to

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List of Regulatory Commitments

List of Regulatory 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 3.9.6 (Refuel Machine) TS 3.9.7 (Crane Travel)	X		While implementing Technical Specification change