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10 CFR 50.90

W3F1-2014-0076

February 2, 2015

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

SUBJECT: Response to NRC Request for Additional Information Associated with 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. Entergy letter W3F1-2014-0061, License Amendment Request to Relocate Technical Specifications to the Technical Requirements Manual, dated October 1, 2014 (ADAMS Accession Number ML14275A374).
2. NRC Acceptance of License Amendment Request to Relocate Technical Specifications to the Technical Requirements Manual, November 14, 2014 (ADAMS Accession Number ML14319A007).

Dear Sir or Madam:

October 1, 2014, Waterford Steam Electric Station, Unit 3 submitted a license amendment request to relocate Technical Specifications (TS) 3.9.6 (Refuel Machine) and TS 3.9.7 (Crane Travel) to the Waterford 3 Technical Requirements Manual [Reference 1]. On November 14, 2014, the U.S. Nuclear Regulatory Commission (NRC) provided the staff's acceptance review of the amendment request [Reference 2]. Subsequently, the NRC has verbally requested additional information associated with the "No Significant Hazards Consideration."

The "No Significant Hazards Consideration" has been revised in Attachment 1 to provide additional details. Waterford 3 evaluated the no significant hazards consideration by addressing the three standards set forth in 10CFR50.92, "Issuance of amendment."

The proposed change contains no new commitments.

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 February 2, 2015.

Sincerely,

MRC/JPJ/wjs

Attachments:

1. Response to NRC Request for Additional Information

cc: Mr. Marc L. Dapas
Regional Administrator
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**Attachment 1 to**

**W3F1-2014-0076**

**Response to NRC Request for Additional Information**

## No Significant Hazards Consideration

October 1, 2014, Waterford Steam Electric Station, Unit 3 submitted a license amendment request to relocate Technical Specifications (TS) 3.9.6 (Refuel Machine) and TS 3.9.7 (Crane Travel) to the Waterford 3 Technical Requirements Manual [Reference 1]. On November 14, 2014, the U.S. Nuclear Regulatory Commission (NRC) provided the staff's acceptance review of the amendment request [Reference 2]. Subsequently, the NRC has verbally requested additional information associated with the "No Significant Hazards Consideration."

Waterford 3 has added additional detail on 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).

The applicable TS 3.9.6 and TS 3.9.7 design basis accident is the Fuel Handling Accident (FHA) described in the Updated Final Safety Analysis Report (UFSAR) Section 15.7.3.4. 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 and no equipment or intervention can prevent the initiating condition. The proposed change was evaluated against 10CFR50.36(c)(2)(ii) criteria and shows no impact to the lowest functional capability or performance levels of equipment required for safe operation of the facility because the TS 3.9.6 and TS 3.9.7 requirements do not prevent the accident conditions from occurring and do not limit the severity of the accident. Since, the dropped fuel assembly and the impacted fuel assembly are both already failed in the design basis accident scenario, this change could not result in a significant increase in the accident consequences. The TS 3.9.6 and TS 3.9.7 equipment are not required to respond, mitigate, or terminate any design basis accident, thus this change will not adversely impact the likelihood or probability of a design basis accident.

The TS 3.9.6 and TS 3.9.7 requirements do not prevent the accident conditions from occurring and do not limit the severity of the accident, therefore the TS 3.9.6 and TS 3.9.7 relocation to the TRM would not cause a significant increase in the accident probability or accident consequences.

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

   Response: No.

This proposed change relocates TS 3.9.6 (Refuel Machine) and TS 3.9.7 (Crane Travel) to the Waterford 3 TRM. 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.

10CFR50.36(c)(2)(i) states that the llimiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. 10CFR50.36(c)(2)(ii) provides the four criteria in which any one met requires a limiting condition for operation. The proposed change demonstrated that the 10CFR50.36(c)(2)(ii) criteria were not met and the relocation to the TRM is allowable. By not meeting the 10CFR50.36(c)(2)(ii) criteria for inclusion into the TS means that TS 3.9.6 and TS 3.9.7 do not impact the accident analyses previously evaluated and would not create the possibility of a new or different kind of accident.

Specifically, TS 3.9.6 and TS 3.9.7 equipment are not instrumentation used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary (Criterion 1). TS 3.9.6 and TS 3.9.7 do not contain 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 2). TS 3.9.6 and TS 3.9.7 does not contain 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 3). Lastly, TS 3.9.6 and TS 3.9.7 do not contain a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety (Criterion 4).

TS 3.9.6 and 3.9.7 are not required to meet the lowest functional capability or performance levels of equipment required for safe operation of the facility. Therefore, the accident analyses are not impacted and the possibility of a new or different kind of accident from any accident previously evaluated has not changed.

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 is administrative in nature because all requirements will be relocated. Any changes after being relocated to the Waterford 3 TRM will require that the 10CFR50.59 process be entered ensuring the public health and safety is maintained. By using the 10CFR50.59 process for future changes, the regulatory requirements ensure that no significant reduction in the margin of safety occurs.

In addition, the TS 3.9.6 and TS 3.9.7 requirements do not prevent the design basis accident conditions from occurring and do not limit the severity of the accident. Thus, TS 3.9.6 and TS 3.9.7 relocation will not adversely impact the accident analyses and will not cause a significant reduction in the margin of safety.

## REFERENCES

1. Entergy letter W3F1-2014-0061, License Amendment Request to Relocate Technical Specifications to the Technical Requirements Manual, October 1, 2014 (ADAMS Accession Number ML14275A374).
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