

# PUBLIC SUBMISSION

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**Docket:** NRC-2015-0205  
Entergy Operations, Inc.; Waterford Steam Electric Station, Unit 3

9/8/2015

FR 53892

**Comment On:** NRC-2015-0205-0001  
Entergy Operations, Inc.; Waterford Steam Electric Station, Unit 3; License Amendment Application

**Document:** NRC-2015-0205-DRAFT-0001  
Comment on FR Doc # 2015-22553

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## Submitter Information

**Name:** Anonymous Anonymous

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RULES AND DIRECTIVES  
FRANCIS  
TS/PRO

## General Comment

Docket ID NRC-2015-0205 Waterford Reactor in New Orleans

I object to this and all of your other continued efforts to undermine public safety. Why do you hate America so? Approximately 2 million people are in the 50 mile fallout radius. They cannot be evacuated. An accident at Waterford would shut down much of the US economy because of impacts on the Mississippi River and its ports.

First find out what's causing the problem, rather than changing the rules.

Why are you letting Japanese owned Westinghouse (Toshiba) hide the alleged safety analysis-justification under false pretense of proprietary rights? You must release this literally critical information to the public.

You should never be using the arithmetic average, which can be all over the place. The Entergy presentation in April gave Individual CEA drop times 3.2 seconds and proposed raising them to 3.5 seconds. This individual CEA drop time seems to be lost in this comment period and must be reinstated, at the minimum.

From Entergy in April: "CEA Drop Times have challenged the Technical Specification (TS) limit in the last two surveillance performances limit in the last two surveillance performances - Waterford 3 TS 3.1.3.4 requires: the arithmetic average of all CEA Drop Times be 3.0 seconds Individual CEA drop times 3 2 seconds Individual CEA drop times 3.2 seconds Insertion time is measured from fully withdrawn position to 90% inserted (p. 4)

Proposed TS Change

Waterford 3 TS 3.1.3.4 would be revised to: - Raise the arithmetic average of all CEA Drop Times to be 3.2

*E-RFDS = ADM-03  
Cadd = M. Openak (mdd04)  
SWSI Review Complete  
Temp Enter = ADM 2013*

seconds Raise the arithmetic average of all CEA Drop Times to be 3.2 seconds - Raise the Individual CEA drop times to 3.5 seconds" ( p.7)  
 CEA DROP TIME TS CHANGE REQUEST CEA DROP TIME T.S. CHANGE REQUEST WATERFORD  
 3 APRIL 22, 2015 <http://pbadupws.nrc.gov/docs/ML1511/ML15113A787.pdf>

Rather you only state that the "amendment would change TS 3.1.3.4 to revise the arithmetic average of all CEA drop times to be less than or equal to 3.5 seconds." <http://www.regulations.gov/contentStreamer?documentId=NRC-2015-0205-0001&disposition=attachment&contentType=pdf>

You must have individual maximums, along with average of all, especially when it is arithmetic average.

These CEA (Control Element Assemblies) are the Control Rods of the nuclear reactor: "Reactor parameters are maintained within acceptable limits by the inherent self-controlling characteristics of the reactor, by CEA positioning, by boron content of the reactor coolant and by operating procedures...." US NRC TECHNICAL TRAINING CENTER COMBUSTION ENGINEERING TECHNOLOGY CROSS TRAINING COURSE SYSTEMS MANUAL <http://pbadupws.nrc.gov/docs/ML0228/ML022840127.pdf>

"In nuclear reactors, control rods are inserted into or removed from guide tubes within a fuel element in order to control the neutron flux... This in turn affects the thermal power of the reactor, the amount of steam generated, and hence the electricity produced. A control element assembly (CEA) is a cluster of control rods which are moved by a single drive mechanism."  
<http://www.world-nuclear-news.org/newsarticle.aspx?id=24614>

So, this is serious business and not to be played around with like you are doing. It's about safely shutting down the nuclear reactor.

The April Entergy presentation stated that any of these problems may be at the root of the slow insertion speed. These need to be addressed:

"Potential Causes Plant Primary Side Modifications

Steam Generator replacement

Reactor Vessel Head replacement

Reactor Vessel Head replacement

CEA replacement

Transition to Next Generation Fuel Product," (p.6)

<http://pbadupws.nrc.gov/docs/ML1511/ML15113A787.pdf>

CEA DROP TIME T S CHANGE REQUEST CEA DROP TIME T.S. CHANGE REQUEST WATERFORD  
 3 APRIL 22, 2015

<http://pbadupws.nrc.gov/docs/ML1511/ML15113A787.pdf>

Drop time is supposed to be less than or equal to 3 seconds:  
<http://pbadupws.nrc.gov/docs/ML0228/ML022840127.pdf>

Appendix has info stating that Westinghouse proprietary info being hidden, which looks like an excuse:

<http://pbadupws.nrc.gov/docs/ML1526/ML15268A019.pdf>

Attachment 3 to W3F1 -2015-0062, has most information blank:

<http://pbadupws.nrc.gov/docs/ML1526/ML15268A019.pdf>