



Entergy Operations, Inc.
17265 River Road
Killona, LA 70057-3093
Tel 504-739-6660
Fax 504-739-6698
mchisum@entergy.com

Michael R. Chisum
Site Vice President
Waterford 3

W3F1-2016-0049

July 12, 2016

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

SUBJECT: Supplement to the Risk-Informed Surveillance Requirements License Amendment Request (LAR) Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

REFERENCE: 1. Entergy letter W3F1-2015-0006, "Application for Technical Specification Change Regarding Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program," Waterford Steam Electric Station, Unit 3 dated June 17, 2015.
[ML15170A121]

Dear Sir or Madam:

By letter dated June 17, 2015, Entergy Operations, Inc. (Entergy), submitted a license amendment request (LAR) to adopt U.S. NRC-approved Technical Specification Task Force (TSTF) Standard Technical Specifications Change traveler TSTF-425 Initiative 5b (Reference 1).

During a conference call on July 11, 2016, between Entergy and the NRC, it was determined that a supplement was needed to correct inconsistencies discovered in Reference 1. Specifically:

1. Table 4.7-1 Item 2 (Isotopic Analysis for Dose Equivalent I-131 Concentration) is an event driven surveillance requirement (SR) that should remain unchanged from the current Table 4.7-1 and not be controlled by the Surveillance Frequency Control Program (SFCP). The markup and clean pages of Table 4.7-1 Item 2 are presented in Attachment 1 to reflect this change.
2. Surveillance Requirement 4.8.1.1.2d refers to another SR (4.8.1.1.2a.4) as a 31 day surveillance providing acceptable alternate credit. SR 4.8.1.1.2a is included in Reference 1 as a frequency that will be controlled under the SFCP, rendering the "31 day" verbiage unnecessary. Since SR 4.8.1.1.2a is explicitly included in the scope of the LAR, removal of the unnecessary reference to "31 days" has already been reviewed and accepted by the NRC pending approval of the LAR. The updated markup and clean pages for SR 4.8.1.1 2d are presented in Attachment 2.

3. The proposed mark-up page for SR 4.1.2.2b provided in Reference 1, Attachment 1, was incorrectly transcribed to the clean page for the same SR provided in Reference 1, Attachment 2. The deleted wording "during shutdown" should not appear in the final version of SR 4.1.2.2b. The updated clean page is presented in Attachment 3.
4. Similarly to item 3 above, the proposed markup page for SR 4.7.3b is correctly depicted in Reference 1, Attachment 1. However, the clean page depicted in Reference 1, Attachment 2, incorrectly included the deleted wording "during shutdown". The updated clean page is presented in Attachment 4.

The above corrections are considered editorial and are consistent with current TS and the LAR (Reference 1). The proposed No Significant Hazards Consideration provided in Reference 1 remains unchanged.

There are no new regulatory commitments contained in this submittal. If you require additional information, please contact the Regulatory Assurance Manager, John Jarrell, at 504-739-6685.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 12, 2016.

Sincerely,



MRC/AJH

Attachment:

1. TS Table 4.7-1 Item 2 Markup and Clean Pages
2. TS SR 4.8.1.1.2d Markup and Clean Pages
3. TS SR 4.1.2.2b Clean Page
4. TS SR 4.7.3b Clean Page

cc: Kriss Kennedy
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
1600 E. Lamar Blvd.
Arlington, TX 76011-4511

RidsRgn4MailCenter@nrc.gov

NRC Senior Resident Inspector
Waterford Steam Electric Station Unit 3
P.O. Box 822
Killona, LA 70066-0751

Frances.Ramirez@nrc.gov
Chris.Speer@nrc.gov

U. S. Nuclear Regulatory Commission
Attn: Dr. April Pulvirenti
Washington, DC 20555-0001

April.Pulvirenti@nrc.gov

Louisiana Department of Environmental
Quality
Office of Environmental Compliance
Surveillance Division
P.O. Box 4312
Baton Rouge, LA 70821-4312

Ji.Wiley@LA.gov

ATTACHMENT 1

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TS Table 4.7-1 Item 2 Markup and Clean Pages

TABLE 4.7-1

SECONDARY COOLANT SYSTEM SPECIFIC ACTIVITY
SAMPLE AND ANALYSIS PROGRAM

<u>TYPE OF MEASUREMENT AND ANALYSIS</u>	<u>SAMPLE AND ANALYSIS FREQUENCY</u>
1. Gross Activity Determination	At least once per 72 hours
2. Isotopic Analysis for DOSE EQUIVALENT I-131 Concentration	a) 1 per 31 days, whenever the gross activity determination indicates iodine concentrations greater than 10% of the allowable limit. b) 1 per 6 months, whenever the gross activity determination indicates iodine concentrations below 10% of the allowable limit.

Add INSERT 1b

TABLE 4.7-1

SECONDARY COOLANT SYSTEM SPECIFIC ACTIVITY
SAMPLE AND ANALYSIS PROGRAM

<u>TYPE OF MEASUREMENT AND ANALYSIS</u>	<u>SAMPLE AND ANALYSIS FREQUENCY</u>
1. Gross Activity Determination	In accordance with the Surveillance Frequency Control Program
2. Isotopic Analysis for DOSE EQUIVALENT I-131 Concentration	a) 1 per 31 days, whenever the gross activity determina- tion indicates iodine con- centrations greater than 10% of the allowable limit. b) 1 per 6 months, whenever the gross activity determination indicates iodine concentra- tions below 10% of the allowable limit.

ATTACHMENT 2

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TS SR 4.8.1.1.2d Markup and Clean Pages

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- +
- Add INSERT 1b**
- d. ~~At least once per 184 days~~ a diesel generator fast start test shall be performed in accordance with TS 4.8.1.1.2a.4. Performance of the ~~184 day~~ fast start test satisfies the ~~31 day~~ testing requirements specified in TS 4.8.1.1.2a.4.
- e. ~~At least once per 18 months~~ by:
1. Verifying the generator capability to reject a load of greater than or equal to 498 kW while maintaining voltage at 4160 +420, -240 volts and frequency at 60 +4.5, -1.2 Hz.
 2. Verifying the generator capability to reject a load of an indicated 4000-4400 kW without tripping. The generator voltage shall not exceed 5023 volts during and following the load rejection.
 3. During shutdown, simulating a loss-of-offsite power by itself, and:
 - a) Verifying deenergization of the emergency busses and load shedding from the emergency busses.
 - b) Verifying the diesel starts on the auto-start signal, energizes the emergency busses and the permanently connected loads within 10 seconds after the auto-start signal, energizes the auto-connected shutdown loads through the load sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the shutdown loads. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at 4160 +420, -240 volts and 60 +1.2, -0.3 Hz during this test.
 4. Verifying that on an SIAS actuation test signal (without loss-of-offsite power) the diesel generator starts on the auto-start signal and operates on standby for greater than or equal to 5 minutes. The steady-state generator voltage and frequency shall be 4160 +420, -240 volts and 60 ± 1.2 Hz within 10 seconds after the auto-start signal; the generator voltage and frequency shall be maintained within these limits during this test.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- d. **In accordance with the Surveillance Frequency Control Program** a diesel generator fast start test shall be performed in accordance with TS 4.8.1.1.2a.4. Performance of the fast start test satisfies the testing requirements specified in TS 4.8.1.1.2a.4.
- e. **In accordance with the Surveillance Frequency Control Program** by:
 - 1. Verifying the generator capability to reject a load of greater than or equal to 498 kW while maintaining voltage at 4160 +420, -240 volts and frequency at 60 +4.5, -1.2 Hz.
 - 2. Verifying the generator capability to reject a load of an indicated 4000-4400 kW without tripping. The generator voltage shall not exceed 5023 volts during and following the load rejection.
 - 3. During shutdown, simulating a loss-of-offsite power by itself, and:
 - a) Verifying deenergization of the emergency busses and load shedding from the emergency busses.
 - b) Verifying the diesel starts on the auto-start signal, energizes the emergency busses and the permanently connected loads within 10 seconds after the auto-start signal, energizes the auto-connected shutdown loads through the load sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the shutdown loads. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at 4160 +420, -240 volts and 60 +1.2, -0.3 Hz during this test.
 - 4. Verifying that on an SIAS actuation test signal (without loss-of-offsite power) the diesel generator starts on the auto-start signal and operates on standby for greater than or equal to 5 minutes. The steady-state generator voltage and frequency shall be 4160 +420, -240 volts and 60 ± 1.2 Hz within 10 seconds after the auto-start signal; the generator voltage and frequency shall be maintained within these limits during this test.

ATTACHMENT 3

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TS SR 4.1.2.2b Clean Page

REACTIVITY CONTROL SYSTEMS

FLOW PATHS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.2 At least two boron injection flow paths to the RCS via the charging pumps shall be OPERABLE. The following flow paths may be used:

- a. With the contents of either boric acid makeup tank in accordance with Figure 3.1-1, the following flow paths shall be OPERABLE:
 1. One flow path from an acceptable boric acid makeup tank via its boric acid makeup pump; and
 2. One flow path from an acceptable boric acid makeup tank via its gravity feed valve; or
- b. With the combined contents of both boric acid makeup tanks in accordance with Figure 3.1-2, both of the following flow paths shall be OPERABLE:
 1. One flow path consisting of both boric acid makeup pumps, and
 2. One flow path consisting of both gravity feed valves.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With only one of the above required boron injection flow paths to the Reactor Coolant System OPERABLE, restore at least two boron injection flow paths to the Reactor Coolant System to OPERABLE status within 72 hours or be in at least HOT STANDBY and boric acid to a SHUTDOWN MARGIN equivalent to the requirements of Specification 3.1.1.1 or 3.1.1.2, whichever is applicable, within the next 6 hours; restore at least two flow paths to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.2 At least two of the above required flow paths shall be demonstrated OPERABLE:

- a. By verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position **in accordance with the Surveillance Frequency Control Program.**
- b. By verifying that each automatic valve in the flow path actuates to its correct position on an SIAS test signal **in accordance with the Surveillance Frequency Control Program.**
- c. By verifying that the flow path required by Specification 3.1.2.2a.1 and 3.1.2.2a.2 delivers at least 40 gpm to the Reactor Coolant System **in accordance with the Surveillance Frequency Control Program.**

ATTACHMENT 4

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TS SR 4.7.3b Clean Page

PLANT SYSTEMS

3/4.7.3 COMPONENT COOLING WATER AND AUXILIARY COMPONENT COOLING WATER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.3 At least two independent component cooling water and associated auxiliary component cooling water trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With only one component cooling water and associated auxiliary component cooling water train OPERABLE, restore at least two trains to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.3 Each component cooling water and associated auxiliary component cooling water train shall be demonstrated OPERABLE:

- a. **In accordance with the Surveillance Frequency Control Program** by verifying that each valve (manual, power-operated, or automatic) servicing safety-related equipment that is not locked, sealed, or otherwise secured in position, is in its correct position. |
- b. **In accordance with the Surveillance Frequency Control Program**, by verifying that each automatic valve servicing safety-related equipment actuates to its correct position on SIAS and CSAS test signals. |
- c. **In accordance with the Surveillance Frequency Control Program** by verifying that each component cooling water and associated auxiliary component cooling water pump starts automatically on an SIAS test signal. |