



ENTERGY

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W3F1-94-0023

A4.05

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March 16, 1994

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Clarification of Technical Specification Change Request
NPF-38-116

Gentlemen:

On July 18, 1991, Entergy Operations, Inc., requested a change to Waterford 3 Technical Specification (TS) 3/4.7.6, "Control Room Air Conditioning System." As you know, the request proposed that TS 3/4.7.6 be subdivided into four new TS's that clearly related the different system design functions to the surveillance program and the TS Limiting Conditions for Operation. Changes to the related TS bases were also included in the request.

In accordance with your verbal request, this letter is intended to clarify certain aspects of the earlier submittal and to address questions raised by the NRC staff during the review process.

First, as previously agreed, proposed TS 3.7.6.1, "Control Room Emergency Air Filtration System," Action 'b' should be clarified to reflect the fact that the time requirements for the shutdown action statement are intended to be consistent with those provided in TS 3.0.3. Accordingly, please add

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"within one hour" to the proposed TS 3.7.6.1 Action 'b' as follows:

With both control room emergency air filtration trains inoperable, restore one train to OPERABLE status within one hour or be in at least HOT STANDBY within the next six hours and in COLD SHUTDOWN within the following 30 hours.

Second, proposed TS 3.7.6.4, "Control Room Isolation and Pressurization," Actions 'c.2' and 'c.3' should be reformatted to better reflect the fact that both actions are applicable when the plant is in Modes 1 - 4.

Accordingly, please replace proposed TS 3.7.6.4 Actions 'c.2' and 'c.3' with the single Action 'c.2' as follows:

In MODES 1 - 4:

- a. Within 72 hours, identify the cause of the failure and initiate corrective action to restore the control room envelope to OPERABLE status. If identified, operation may continue for up to 7 days after the control room envelope is declared inoperable. Otherwise, be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.
- b. Should a toxic gas event occur, take immediate steps to restore control room envelope integrity and commence a plant shutdown to be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

In conjunction with this change, please renumber proposed TS 3.7.6.4 Action 'c.4' as Action 'c.3'.

The proposed TS 3.7.6.4 action statement 'c.2.b' shown above (as well as the original proposal) requires, in part, that operators take "immediate steps" to restore control room envelope integrity should a toxic gas event occur while the control room envelope is inoperable. In this context, the phrase "immediate steps" is taken to mean that the operators should immediately take reasonable action to restore a known breach in the envelope to an air-tight condition. Amplifying instructions are provided

in Waterford 3 Administrative Procedure UNT-005-028, "Maintaining Control Room Envelope Integrity During Maintenance Outages," which imposes special controls for work that will breach the control room envelope.

For example, UNT-005-028 requires that the Shift Supervisor (SS) maintain cognizance of all planned and deliberate breaches of the envelope and ensure that the emergency breathing air supply system is operable and that self-contained breathing apparatus is staged in the envelope prior to commencing work. The SS also must ensure that an "Emergency Closure Kit" (generally including duct tape, herculite, and other material as necessary) is available for temporary envelope restoration if required during the course of the work.

Additionally, UNT-005-028 requires that the cognizant system engineer review all work which has the potential to breach the envelope. In the course of this review, the system engineer must specify the contents of the emergency closure kit and provide instructions on its use to restore the control room to a sufficiently air-tight condition. General guidelines to be followed in the event that the SS directs temporary closure of the control room envelope (including use of the closure kit) are also included in UNT-005-028.

Finally, the surveillance requirements for TS 3/4.7.6.3, "Control Room Air Temperature," should be clarified to better ensure that the Limiting Condition for Operation is satisfied and that two independent control room air conditioning units are, in fact, operable. To that end, please modify proposed surveillance 4.7.6.3 as follows:

Each control room air conditioning unit shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the operating control room air conditioning unit is maintaining average control room air temperature less than or equal to 80°F.

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- b. At least quarterly, if not performed within the last quarter, by verifying that each control room air conditioning unit starts and operates for at least 15 minutes.

As discussed throughout, Entergy Operations, Inc. considers the changes requested herein to be clarifications of the proposed Technical Specifications submitted to the NRC on July 18, 1991. As such, the safety and significant hazards determination provided with the original submittal remains valid.

If you have additional questions or require further assistance, please contact T.W. Gates at (504) 739-6697.

Very truly yours,



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