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W3F1-94-0119
A4.05
PR

April 5, 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
Partial Withdrawal of Technical Specification Change Request
NPF-38-144

Gentlemen:

By letter W3F1-93-0309 dated November 16, 1993, Waterford 3 proposed a change to Facility Operating License No. NPF-38. The proposed change revised Technical Specification (TS) 3.2.4b and TS 3.2.4c. These changes were proposed to prevent restriction on base operating margin due to thermal margin event requirements when Core Operating Limit Supervisory System (COLSS) is in service and both Control Element Assembly Calculators (CEACs) are inoperable or when COLSS is out of service and at least one CEAC is operable.

The purpose of this letter is to modify our amendment application by withdrawing the portion of the change concerning TS 3.2.4b. TS 3.2.4b currently requires the COLSS calculated power operating limit to be reduced by 13% when COLSS is in service and neither CEAC is operable. COLSS is normally used to monitor DNBR margin. When at least one CEAC is operable, Specification 3.2.4a provides enough margin to DNB to

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accommodate the limiting Anticipated Operational Occurrence (AOO) without exceeding Specified Acceptable Fuel Design Limits (SAFDLs). When neither CEAC is operable, the Core Protection Calculators (CPCs) lack the CEA position information to ensure a reactor trip when necessary. In this case, TS 3.2.4b requires COLSS calculated power operating limit based on DNBR to be reduced to ensure that the limiting AOO will not result in exceeding SAFDLs. The proposed change revised the reduction in power operating limit from 13% to 16% in TS 3.2.4b.

The COLSS/CPC setpoint analysis for AOOs is typically completed subsequent to plant shutdown so that burnup related input from the just finished fuel cycle can be more exactly determined. This process avoids operating with unnecessary margin penalties due to incorporating conservative input assumptions. However, to allow sufficient time to process a Technical Specification change, an estimate of the analysis margin requirements must be made well in advance of completing these analyses. Upon completion of the Waterford 3 Cycle 7 Reload Analyses (September, 1993), it was estimated that an additional 3% margin would be required to achieve acceptable results for the limiting AOOs and both CEACs inoperable. Thus, a change to Technical Specification 3.2.4b was submitted to increase the required power operating limit reduction from 13% to 16%.

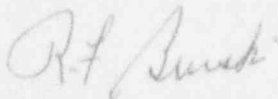
The COLSS/CPC setpoint analysis is now complete and Waterford 3 has confirmed that the current TS reduction in COLSS power operating limit of 13% (when COLSS is in service and neither CEAC is operable) will ensure adequate margin so that SAFDLs are not exceeded for the limiting AOOs.

Therefore, Waterford 3 withdraws the proposed change to TS 3.2.4b. The proposed change to TS 3.2.4c is still desired and other than the removal of information concerning TS 3.2.4b, the safety analysis and subsequent no significant safety hazards determination remain valid.

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If you should have any questions concerning the above, please contact
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Very truly yours,



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