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W3P90-1176  
A4.05  
QA

December 7, 1990

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  
Technical Specification Change Request NPF-38-112  
Implementation of Generic Letter 89-01

Gentlemen:

On January 31, 1989, the Nuclear Regulatory Commission (NRC) published the subject generic letter summarizing the results of the NRC's study of RETS as it relates to the Commission's Interim Policy Statement on Technical Specification Improvements. This study concluded that controls could be implemented in the Administrative Controls section of the Technical Specifications to satisfy existing regulatory requirements for RETS. With these controls in place, procedural details of the current technical specifications on radioactive effluents and radiological environmental monitoring could be relocated to the Offsite Dose Calculation Manual (ODCM). Similarly, procedural details of the current technical specification on solid radioactive wastes could be relocated to the Process Control Program (PCP). This simplification of the RETS is identified in Generic Letter 89-01 as a line-item improvement of the technical specifications consistent with the goals of the policy statement on Technical Specification Improvements.

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Generic Letter 89-01


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December 7, 1990

Page 2

The attached safety analysis justifies the removal of the RETS procedural details from and the incorporation of programmatic controls in the Waterford 3 Technical Specifications. This proposed amendment conforms with the guidance of Generic Letter 89-01. Should you have any questions or comments on this matter, please feel free to contact D.A. Rothrock at (504) 739-6693.

Very truly yours,



RPB/DAR/ssf

Attachments: NPF-38-112  
Affidavit

cc: Messrs. R.D. Martin, NRC Region IV  
D.L. Wigginton, NRC-NRR  
E.L. Blake  
R.B. McGehee

NRC Resident Inspectors Office  
Administrator Nuclear Energy Division (State of Louisiana)  
American Nuclear Insurers

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the matter of )  
 )  
Entergy Operations, Incorporated ) Docket No. 50-382  
Waterford 3 Steam Electric Station )

AFFIDAVIT

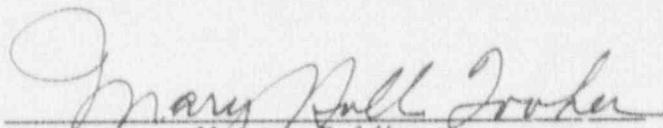
R.P. Barkhurst, being duly sworn, hereby deposes and says that he is Vice President Operations - Waterford 3 of Entergy Operations, Incorporated; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request NPF-38-112; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.



\_\_\_\_\_  
R.P. Barkhurst  
Vice President Operations - Waterford 3

STATE OF LOUISIANA )  
 ) ss  
PARISH OF ORLEANS )

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 7th day of December, 1990.

  
\_\_\_\_\_  
Notary Public

My Commission expires life.

DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-38-112

In accordance with Generic Letter 89-01, this safety analysis justifies making technical specification line-item improvements relative to the Radiological Effluent Technical Specifications (RETS).

Existing Specifications

See Attachment A.

Proposed Specifications

See Attachment B.

Description

This proposal requests NRC approval to relocate procedural details on radioactive effluents, solid radioactive wastes and radiological environmental monitoring from the Waterford 3 Technical Specifications (TS) to the Offsite Dose Calculation Manual (ODCM) and the Process Control Program (PCP) and to implement controls in the Administrative Controls section governing these programs.

A summary of these changes is as follows:

<u>Tech. Spec. #</u>	<u>Change</u>
Index for Definitions	Delete Definition 1.31
Index for LCOs	Delete Section 3/4.12
Index for Administrative Controls	Renumber Sections 6.9 through 6.15
Index for List of Tables	Delete Tables 3.3-12, 4.3-8 Change Tables 3.3-13, 4.3-9  Delete Tables 4.11-1 and -2, 3.12-1 and -2, 4.12-1
1.16	New definition for the ODCM.
1.22	New definition for the PCP.
1.31	Solidification definition moves to PCP and 1.31 is deleted.
3/4.3.3.10	Whole section moves to ODCM.

<u>Tech. Spec. #</u>	<u>Change</u>
3/4.3.3.11	References to explosive gas monitoring remain, all other references to radiological systems move to the ODCM.
3/4.11.1.1	Whole section moves to ODCM.
3/4.11.1.2	Whole section moves to ODCM.
3/4.11.1.3	Whole section moves to ODCM.
3/4.11.1.4	Does not change as per generic letter.
3/4.11.2.1	Whole section moves to ODCM.
3/4.11.2.2	Whole section moves to ODCM.
3/4.11.2.3	Whole section moves to ODCM.
3/4.11.2.4	Whole section moves to ODCM.
3/4.11.2.5	Does not change as per generic letter.
3/4.11.2.6	Does not change as per generic letter.
3/4.11.3	Whole section moves to PCP.
3/4.11.4	Whole section moves to ODCM.
3/4.12	All three parts move to ODCM.
B3/4.11.1.1 - .3	Whole Bases section moves to the ODCM.
B3/4.11.2.1 - .4	Whole Bases section moves to the ODCM.
B3/4.11.3 - .4	Whole Bases section moves to the PCP or ODCM, as appropriate.
B3/4.12.1 - .3	Whole Bases section moves to the ODCM.
6.8.4	Add sections f. and g. for RETS administrative purposes.
6.9.1.7	A change to the Annual Radiological Environmental Operating Report description.
6.9.1.8	A change to the Semi-Annual Radioactive Effluent Release Report description.
6.10.3	Insert a section for record retention.
6.13.2	Changes how PCP revisions are made in accordance with Generic Letter 89-01.

Tech. Spec. #

Change

6.14.2

Changes how ODCM revisions are made in accordance with Generic Letter 89-01.

6.15

Whole section moved to the ODCM or PCP, as appropriate.

Generic Letter 89-01 provides guidance for the preparation of an amendment to add programmatic controls of the ODCM and the PCP to the administrative section of the TS. This allows for relocation of procedural details on the control of radioactive effluents and solid wastes from the TS to the relative program in order to simplify the RETS. These changes conform to the Commission's Policy Statement for TS Improvements.

This proposed amendment has been prepared in accordance with the guidance of Generic Letter 89-01. As such, this amendment will:

1. Incorporate programmatic controls in the Administrative Controls section of the TS that satisfy the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a. and Appendix I to 10 CFR Part 50;
2. Relocate existing procedural details from current specifications involving radioactive effluent monitoring instrumentation, the control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, radiological environmental monitoring, and radiological reporting details from the TS to the ODCM;
3. Relocate the definition of solidification, and existing procedural details from the current specification on solid radioactive wastes to the PCP;
4. Simplify associated reporting requirements;
5. Simplify administrative controls for changes to the ODCM and PCP;
6. Add record retention requirements for changes to the ODCM and PCP; and
7. Update definitions of the ODCM and PCP in the TS consistent with these changes.

Enclosure 1 to Generic Letter 89-01 states this amendment request is to demonstrate three things. First, it should demonstrate the correct incorporation of programmatic controls for radioactive effluents and radiological environmental monitoring. Enclosure 3 to the generic letter gives the specific verbiage to be used in the administrative section of the TS. As suggested in the generic letter, this amendment has incorporated the model specification text from Generic Letter 89-01 Enclosure 3 to replace existing requirements (Attachment B to this safety analysis) without revision of the text. Additionally, the definitions of the ODCM and PCP have been updated as stipulated in the generic letter. The amendment also removes the gaseous effluent monitoring instrumentation requirements but retains the

requirements for explosive gas monitoring instrumentation (consistent with Enclosure 4 for the generic letter). Only changes in format have been made to keep the proposed specifications in agreement numerically with the Waterford 3 TS.

Secondly, the amendment request is to demonstrate the correct incorporation of procedural details of the current RETS into the ODCM and the PCP. Specifically, this consists of the TS limiting conditions for operation, their applicability, remedial actions, surveillance requirements, and the bases section of the technical specifications for these requirements. This too, has been done in accordance with Generic Letter 89-01 Enclosure 1. Finally, this amendment is to demonstrate that the guidance of Generic Letter 89-01 has been correctly followed. As support to these two items, approved copies of the ODCM and the PCP are provided as Attachments C and D to this amendment request.

### Safety Analysis

The proposed change discussed above shall be deemed to involve a significant hazards consideration if there is a positive finding in any of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequence of an accident previously evaluated?

Response: No

The proposed amendment relocates procedural details from the Waterford 3 TS to the ODCM or the PCP without revision. Administrative controls are to be placed in the TS to control these programs. As a result, all aspects of the FSAR safety analyses will remain unchanged and there will be no physical change to the facility. Therefore, the proposed change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change relocates conformance details from the TS to the ODCM and PCP. This relocation of the RETS program does not reduce the controls on radiological effluent. No plant design changes are necessary to implement these line-item improvements. Therefore, the current plant safety analyses remain complete and accurate in addressing the licensing basis events, and analyzing the plant response and consequences, and the proposed amendment cannot create the possibility of a new and different kind of accident than previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: No

Radiological regulatory requirements are established in 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a., and Appendix I to 10 CFR Part 50. The limits defined for Waterford 3 based on these requirements will be relocated from the TS to the ODCM and PCP, unchanged. All technical content will be preserved. Since there will be no change to the physical design or operation of the plant, the proposed amendment will not involve a reduction in a safety margin.

The Commission had provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. This proposal most closely resembles example (vii):

(vii) A change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations.

This proposal most closely resembles example (vii) since the changes conform with Generic Letter 89-01 to support the Commission's Interim Policy Statement on Technical Specification Improvements. These changes, considered to be line-item changes, preserve all regulatory requirements and have negligible impact on the operation of Waterford 3.

#### Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; and (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.