



ENTERGY

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Waterford 3

W3F1-94-0106
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February 14, 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
Technical Specification Change Request NPF-38-151

Gentlemen:

The attached description and safety analysis supports a change to the Waterford 3 Technical Specifications (TS). The proposed change relocates the reactor trip system (RTS) and engineered safety feature actuation system (ESFAS) response time limits from the TS to the updated Final Safety Analysis Report (FSAR). The proposed change adopts the TS "line-item improvement" as recommended in NRC Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," dated December 29, 1993.

The circumstances surrounding this change do not meet the NRC's criteria for exigent or emergency review. However, due to the impact on our upcoming refueling outage, we respectfully request an expeditious review.

During fuel Cycle 6, Waterford 3 experienced problems with Containment Spray isolation valve CS-125A. The problem was discovered while performing an ESFAS relay surveillance test. The test started and ran the associated Containment Spray pump and a high differential pressure developed across CS-125A that could have prohibited the valve from opening.

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Technical Specification Change Request NPF-38-151
W3F1-94-0106
Page 2
February 14, 1994

As part of the solution to this problem, Waterford 3 submitted and received approval for emergency Technical Specification Change Request NPF-38-143. This license amendment modified TS 3/4.6.3 Containment Isolation by incorporating an interim provision that allows CS-125 A and B to remain open until startup following Refueling Outage 6.

During Refuel 6, Waterford 3 will install a design change that will modify the control circuit of the Containment Spray pumps by delaying the pump start signal. Delaying the start of the pumps will allow the valves to partially open prior to the resultant pressure surge. However, this design change will impact the response time limit for the Containment Spray pumps, Item 4a of TS Table 3.3-5(offsite power available).

An engineering calculation has determined that the planned increase for the Containment Spray pump response time limit is acceptable. Therefore, Waterford 3 would prefer to adopt the NRC TS line-item improvement to relocate the response times from the TS to the FSAR. Upon approval of this proposed change the Containment Spray pump response time limit will be modified under the provisions of 10CFR50.59.

Waterford 3 plans to shutdown for a 46 day refueling outage beginning March 4, 1994. We respectfully request that your review and approval accommodate this schedule such that an approved TS amendment may be implemented prior to startup.

Technical Specification Change Request NPF-38-151
W3F1-94-0106
Page 3
February 14, 1994

Should you have any questions or comments concerning this request, please contact Paul Caropino at (504) 739-6692.

Very truly yours,



R.P. Barkhurst
Vice President, Operations
Waterford 3

RPB/PLC/ssf

Attachments: Affidavit
NPF-38-151

cc: L.J. Callan, NRC Region IV
D.L. Wigginton, NRC-NRR
R.B. McGehee
M.S. Reynolds
NRC Resident Inspectors Office
Administrator Radiation Protection 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-38-151; 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 ST. CHARLES)

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 14th day of FEBRUARY, 1994.



Notary Public

My Commission expires WITH LIFE.

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-151

The proposed change to the Technical Specifications (TS) relocates the reactor trip system (RTS) and engineering safety feature actuation system (ESFAS) response time limits from the TS to the updated Final Safety Analysis Report (FSAR). This change is in verbatim compliance with NRC Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," dated December 29, 1993.

The proposed change is reflected in the TS as follows:

- TS Limiting Condition for Operation (LCO) 3.3.1 is modified by removing reference to Table 3.3-2.
- TS Surveillance 4.3.1.3 for the RTS response time testing is modified by adding the statement, "Neutron detectors are exempt from response time testing."
- Table 3.3-2, "Reactor Protective Instrumentation Response Times." is deleted and replaced with a single page stating, "Page 3/4 3-9 has been deleted."
- TS LCO 3.3.2 is modified by removing reference to the Table 3.3-5.
- Table 3.3-5, "Engineered Safety Features Response Time," is deleted and replaced with a single page stating, "Pages 3/4 3-23 and 3/4 3-24 have been deleted."

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Description

Generic Letter 93-08 provides guidance to licensees for preparing a proposed license amendment to relocate the tables of response time limits for the RTS and ESFAS instruments from the TS to the FSAR. As stated in Generic Letter 93-08, the LCOs for RTS and ESFAS instruments require that these systems be operable with response times as specified in the TS tables for these systems.

The surveillance requirements specify that licensees test these systems and verify that the response time of each function is within its limits. Relocating the tables of the RTS and ESFAS instrument response time limits from the TS to the updated FSAR will not alter these surveillance requirements. The updated FSAR will now address the response time limits for the RTS and ESFAS instruments including those channels for which the response time limit is indicated as "N/A"; that is, a response time limit is not applicable. The updated FSAR will also clarify response time limits where footnotes are included in the tables that describe how those limits are applied.

Upon approval of this request, changes to response time limits for the RTS and ESFAS instruments will be administratively controlled in accordance with the provisions of 10CFR50.59.

Currently, Waterford 3 plant procedures for response time testing include acceptance criteria that reflect the RTS and ESFAS response time limits in the TS tables that are being relocated from the TS to the updated FSAR. Waterford 3 will include the RTS and ESFAS response time limits in the next update of the FSAR.

Safety Analysis

The proposed change described 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 consequences of any accident previously evaluated?

Response: No

The proposed changes are administrative in nature and do not involve any change to the configuration or method of operation of any plant equipment used to mitigate the consequences of an accident.

The proposed changes do not alter the conditions or assumptions in any accident previously evaluated.

Therefore, the proposed changes will 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 type of accident from any accident previously evaluated?

Response: No

The proposed changes are administrative in nature and do not involve any change to the configuration or method of operation of any plant equipment used to mitigate the consequences of an accident. No new accident initiators or failure modes are created by relocating the RTS and ESFAS instrumentation response time limits.

Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any 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

The proposed changes are administrative in nature and will in no way affect the TS adequacy in ensuring the response times for the RTS and ESFAS instrumentation do not exceed the limits assumed in the accident analyses. The proposed changes will have no impact on the protective boundaries, safety limits, or margin of safety.

Therefore, the proposed changes will not involve a significant reduction in the margin of safety.

Safety and Significant Hazards Determination

Based on the above safety analysis, it is concluded that: (1) the proposed change does not constitute a significant hazard consideration as defined by 10CFR50.92; 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.

NPF-38-151

ATTACHMENT A