



**ENTERGY**

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**Ross P. Barkhurst**  
Vice President, Operations  
Waterford 3

W3F1-94-0120  
A4.05  
PR

June 22, 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-38-153

Gentlemen:

The attached description and safety analysis support a change to the Waterford 3 Technical Specifications (TS).

The proposed change modifies the Waterford 3 TS by relocating the Seismic and Meteorological Monitoring Instrumentation and their associated requirements from the TS pursuant to the NRC Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors.

The proposed change has been evaluated in accordance with 10CFR50.91(a)(1) using criteria in 10CFR50.92(c) and it has been determined that the proposed change involves no significant hazards considerations. The Plant Operating Review and Safety Review Committees have reviewed and accepted the proposed change based on the foregoing evaluation.

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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

Attachment:

Affidavit

NPF-38-153

Reference List

cc:

L.J. Callan, NRC Region IV

D.L. Wigginton, NRC-NRR

R.B. McGehee

N.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-38-153; 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 22<sup>ND</sup> day of JUNE, 1994.



Notary Public

My Commission expires WITH LIFE.

DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-38-153

This proposed change modifies the Waterford 3 Technical Specifications by removing the requirements associated with the Seismic and Meteorological Monitoring Instrumentation. The proposed change will relocate these requirements to the Waterford 3 updated Final Safety Analysis Report (FSAR) to further the goal of Technical Specifications Improvements as delineated in NRC policy statements.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Background

On February 6, 1987, the NRC published its Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors in the Federal Register (Reference 1). In late 1987, based on the Interim Policy Statement, each of the four nuclear steam supply system (NSSS) owners groups submitted proposals identifying requirements in the existing Standard Technical Specifications (STS) that could be relocated from the TS to licensee controlled documents. The staff reviewed these submittals and published its conclusion in the report "NRC Staff Review of Nuclear Steam Supply System Vendor Owners Groups' Application of the Commission's Interim Policy Statement Criteria to Standard Technical Specifications", or "Split Report"(Reference 2).

The NRC Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (Reference 3) provides criteria to be utilized in determining which requirements need to be governed by TS. The goal is to assure that TS requirements are consistent with 10CFR 50.36 and have a sound safety basis. The Split Report identified which STS requirements must be retained in the new STS (having met one or more criteria) and those requirements that could be relocated (having met none of the criteria).

Following the guidance of the Split Report, the owners groups proposed improved STS that were subsequently approved and published by the staff as improved STS NUREG reports.

CEN-355 Vol. 5 "Restructured Technical Specifications, Discussion of Changes" (Reference 4), indicates that the Seismic and Meteorological Monitoring Instrumentation requirements are relocated per the criteria application. The CE restructured STS were approved by the staff and issued via NUREG-1432 "Standard Technical Specifications Combustion Engineering Plants." Therefore, Waterford 3 proposes to relocate the identified requirements consistent with NRC approved TS improvements.

#### Description

The requirements specified in the following Limiting Conditions For Operation (LCOs), Surveillance Requirements (SRs), and Tables will be incorporated into the Waterford 3 FSAR and plant procedures:

<u>Seismic Monitoring</u>	<u>Meteorological Monitoring</u>
LCO 3.3.3.3	LCO 3.3.3.4
SR 4.3.3.3.1 & 4.3.3.3.2	SR 4.3.3.4
Table 3.3-7 & 4.3-4	Table 4.3-5

The proposed change replaces TS pages 3/4 3-35 through 3/4 3-40 with a single page stating "PAGES 3/4 3-36 THROUGH PAGE 3/4 3-40 NOT USED." Bases sections 3/4 3.3.3 and 3/4.3.3.4 are revised to remove text and state "This section has been deleted." Index pages V, XX, and XXI are revised to remove reference to relocated information.

#### SEISMIC INSTRUMENTATION

The purpose of seismic monitoring instrumentation is to ensure that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the facility to determine if plant shutdown is required pursuant to Appendix "A" of 10CFR Part 100. The instrumentation is consistent with the recommendations of Regulatory Guide 1.12, "Instrumentation for Earthquakes."

#### METEOROLOGICAL INSTRUMENTATION

The purpose of meteorological monitoring instrumentation is to ensure that sufficient meteorological data is available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public and is consistent with the recommendations of Regulatory Guide 1.23 "Onsite Meteorological Programs."

Since issuance of the Waterford 3 TS on March 16, 1985, Seismic Monitoring Instrumentation Tables (TS Tables 3.3-7 and 4.3-4) have been changed twice. Amendment 14 revised the location of item's 2a & b and Amendment 52 revised the location of item 2b. Currently Table 4.3-4 item 4e needs to be revised. Table 4.3-4 requires the Peak Shock Annunciator Control Unit (item 4e) to be channel calibrated each refueling. However, the vendor maintenance manual (Reference 5) indicates that no calibration is required within the annunciator as all preset limits are controlled by the factory set switch contacts. This results in a verbatim compliance issue when implementing channel calibration as defined by TS.

The "Split Report" lists both the Seismic Monitoring and the Meteorological Monitoring Instrumentation as requirements that may be relocated from the TS.

Upon approval of this change, the Seismic and Meteorological Monitoring Instrumentation requirements will be relocated to Waterford 3 licensee controlled documents (i.e., Final Safety Analysis Report and Plant Procedures) and subject to the requirements of 10CFR 50.59.

#### 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 change relocates Seismic and Meteorological Monitoring Instrumentation requirements from the TS to licensee controlled documents consistent with the NRC Policy Statement on Technical Specification Improvements. Criterion 1 of the Policy Statement indicates that the TS should include installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. This criterion is intended to ensure that the TS control those instruments specifically installed to detect excessive reactor coolant system leakage. This criterion is not interpreted to include instrumentation used to detect precursors to reactor coolant pressure boundary leakage (e.g., loose

parts monitor, seismic instrumentation, valve position indicators). Combustion Engineering and the NRC have previously determined that relocating Seismic and Meteorological Monitoring Instrumentation requirements from the TS does not affect any material condition of the plant that could directly contribute to causing or mitigating the effects of an accident.

Therefore, the proposed change 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 change will not involve any design change or modification to the plant. The proposed change will not alter the operation of the plant or the manner in which it is operated. Any subsequent change to the Seismic or Meteorological Monitoring Instrumentation requirements will undergo a review in accordance with the criteria of 10CFR 50.59 to ensure that the change does not involve an unreviewed safety question

Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident 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 change will relocate Seismic and Meteorological Monitoring Instrumentation requirements from the TS to licensee controlled documents subject to the criteria of 10CFR 50.59. The proposed change will have no adverse impact on any protective boundary or safety limit.

Therefore, the proposed change will not involve a significant reduction in a 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 hazards 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.



## References

1. 10CFR Part 50 "Proposed Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (Federal Register/Volume 52, No. 25 / Friday, February 6, 1987 / Rules and Regulations).
2. "NRC Staff Review of Nuclear Steam Supply System Vendor Owners Groups Application of the Commissions Interim Policy Statement Criteria to Standard Technical Specifications" dated May 9, 1988.
3. 10CFR Part 50 "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (Federal Register/Volume 58, No. 139 / Thursday, July 22, 1993 / Rules and Regulations).
4. CEN-355 Volume 5 "C-E Owners Group Restructured Standard Technical Specifications Discussion of Changes" May, 1989.
5. Operation and Maintenance Manual Response Spectrum Annunciator (Waterford 3 Tech Manual No. 457000174).

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ATTACHMENT A