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A4.05
PR

November 7, 1995

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-38-172

Gentlemen:

Entergy Operations, Inc. proposes to amend Facility Operating License NPF-38 for the Waterford 3 SES by incorporating the attached proposed amendment to Technical Specification (TS) 3/4.8.1 "Electrical Power Systems - AC Sources" and the associated TS BASES. The proposed amendment would implement selected changes from NUREG 1432, "Standard Technical Specifications Combustion Engineering Plants," Generic Letter (GL) 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators," and GL 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation." The intent of these changes is to increase Emergency Diesel Generator (EDG) reliability by reducing the stresses on the EDGs caused by unnecessary testing. In accordance with GL 94-01, Waterford 3 commits to implement, within 90 days of the issuance of the license amendment, a maintenance program for monitoring and maintaining EDG performance in accordance with the provisions of 10CFR50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants", and the guidance contained in Regulatory Guide (RG) 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Also, several administrative changes have been proposed which will improve the TS presentation.

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This proposed TS amendment is being submitted as a Cost Beneficial Licensing Amendment (CBLA). Waterford 3 estimates that the proposed changes will save more than $100,000 over the life of the plant.

Should you have any questions or comments concerning this request, please contact Robert Kullmann at (504) 739-6494.

Very truly yours,

R.P. Barkhurst
Vice President, Operations
Waterford 3

RPB/RTK/tjs
Attachment: Affidavit
NPF-38-172

cc: L.J. Callan, NRC Region IV
C.P. Patel, 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-38-172; 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 7TH day of NOVEMBER, 1995.

Stan E. Fehn
Notary Public

My Commission expires WITH LIFE.

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-172

This proposed TS amendment will implement the recommendations of NUREG 1432, GL 94-01, and GL 93-05 as line-item TS improvements. These changes will improve EDG reliability and availability, thereby providing additional assurance that the EDGs will be capable of performing their safety function. This will have an overall positive affect on plant safety, will decrease equipment degradation, and will remove an unnecessary burden on personnel resources by reducing the amount of testing that the TS requires during power operation.

This proposed TS amendment will also relocate the Surveillance Requirements for maintaining the properties of the fuel oil to TS Section 6, "Administrative Controls." These requirements will be implemented as part of the Fuel Oil Testing Program. In addition, the requirement for cleaning the diesel fuel oil storage tanks with a sodium hypochlorite solution or equivalent will be changed to also allow an appropriate mechanical method (such as pressure washing or manual wiping) to be utilized. The use of a mechanical method will eliminate the potential for generation of hazardous waste due to the mixing of sodium hypochlorite and any fuel oil residue remaining in the storage tanks. Also, using a mechanical method will eliminate the potential for residual sodium hypochlorite to oxidize diesel fuel thereby creating unwanted byproducts. The pressure testing requirements of the diesel fuel oil supply system will be removed from the TS. This testing will be controlled by the Waterford 3 Inservice Inspection Program. Also, several administrative changes have been proposed which will improve the TS presentation.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Background

While studying the Surveillance Requirements in Technical Specifications (TS) that require testing during power operation, the U.S. Nuclear Regulatory Commission (NRC) found safety can be improved, equipment degradation decreased, and an unnecessary burden on personnel resources can be eliminated by reducing the amount of testing that the TS require during power operation.

To assist licensees in preparing a license amendment request to implement these recommendations as line-item TS improvements, Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation" was issued in September of 1993. Further guidance specifically related to Emergency Diesel Generator (EDG) testing was provided by the NRC in Generic Letter 94-01, "Removal of Accelerated Testing and Special Reporting Requirements for Emergency Diesel Generators." Additional guidance and recommendations are contained in NUREG 1432 "Standard Technical Specifications Combustion Engineering Plants."

Description

It is requested that TS 3/4.8.1 "Electrical Power Systems - A.C. Sources" be revised for Waterford 3 SES. The proposed changes are intended to increase EDG reliability by reducing the stresses on the EDGs caused by unnecessary testing. Additional changes have also been proposed to TS 3/4.8.1 to further enhance EDG reliability and to make administrative changes to improve the TS presentation. The majority of the proposed changes are based on the guidance and recommendations from NUREG 1432, GL 94-01,and GL 93-05. Listed below is a description of the proposed amendment.

The proposed changes to Waterford 3 Technical Specification 3.8.1.1 Actions are:

1) Action a. delete "If either diesel generator has not been successfully tested within the past 24 hours, demonstrate its OPERABILITY by performing Surveillance Requirement 4.8.1.1.2a.4 separately for each diesel generator (unless it is already operating) within 24 hours."

2) Action b. add "an inoperable support system, an independently testable component, or"; change "24 hours" to "8 hours"; add "unless the absence of any potential common mode failure for the remaining diesel generator is demonstrated."

3) Action c. add "an inoperable support system, an independently testable component, or"; add "unless the absence of any potential common mode failure for the remaining diesel generator is demonstrated"

4) Action e. delete "demonstrate the OPERABILITY of two diesel generators by performing Surveillance Requirement 4.8.1.1.2a.4 separately for each diesel generator within 8 hours unless the diesel generators are already operating;"

The proposed changes to Waterford 3 Technicai Specifications Surveillance Requirements are:

5) Item 4.8.1.1.2a	add "At least once per 31 days", delete "In accordance with the frequency specified in Table 4.8.1"
6) Item 4.8.1.1.2a.4	add "at least 3920"; delete "4160 + 420, - 240"; add "58.8"; delete "60 ± 1.2"; add "**", add "The steady state voltage and frequency shall be maintained at 4160 + 420, -240 volts and 60 ± 1.2 Hz."; at the bottom of page 3/4 8-3 add the ** note concerning modified diesel starts
7) Item 4.8.1.1.2a.5	replace "synchronized (10 seconds), subsequently loaded to an indicated 4200-4400 Kw* in less than or equal to 176 seconds,**" with "synchronized, loaded to an indicated 4000-4400 Kw* in accordance with the manufacturer's recommendation"; delete note at bottom of page 3/4 8-4 "**The diesel generator fast loading requirement (176 sec) shall be performed at least once per 184 days in these surveillance tests. For all other surveillance tests, load the diesel generator at a rate consistent with the manufacturer's recommendations."
8) Item 4.8.1.1.2c	add "Maintain properties of new and stored fuel oil in accordance with the Fuel Oil Testing Program"; delete all previous information and requirements in this section with the exception of the last sentence in subsection 3 which states "Failure to meet this requirement shall not affect diesel generator OPERABILITY; however, corrective action shall be initiated within 72 hours to return the fuel oil supply to within acceptable limits."; change "this" to "these" and "requirement" to "requirements" in the sentence referenced above; add "necessarily" to the sentence referenced above
9) Item 4.8.1.1.2d.1	delete "(HPSI pump)"
10) Item 4.8.1.1.2d.2	add "an indicated 4000-"

11) Item 4.8.1.1.2d.3a delete "# SEE NOTE"

12) Item 4.8.1.1.2d.3b replace "with" with "and the", delete "# SEE NOTE"

13) Item 4.8.1.1.2d.5a delete "# SEE NOTE"

14) Item 4.8.1.1.2d.5b replace "with" with "and the"; delete "# SEE NOTE"; delete note at bottom of page 3/4 8-6 "#NOTE: UNTIL STARTUP FOLLOWING REFUEL 7 In lieu of the prescribed integrated tests (i.e., actual demonstration of shedding, connection, and loading of loads) testing and analysis that shows the capability of the diesel generator to perform these functions will be considered acceptable for train AB A.C. ESF busses. This provision will apply to the associated train AB ESF loads with the exception of Motor Control Center 3AB311 S that has been verified acceptable via analysis."

15) Item 4.8.1.1.2d.6 replace "4.8.1.1.2.d.3b" with "4.8.1.1.2.a.4" and "4200" with "4000"; in ** note at the bottom of page 3/4 8-6 replace "4.8.1.1.2d.3b" with "4.8.1.1.2.a.4", "4200" with "4000", and "1 hour" with "2 hours"; add "an interval of not less than"; delete "at least"; delete "the first"; delete "the remaining"

16) Item 4.8.1.1.2d.7 add "and permanently connected loads"

17) Item 4.8.1.1.2f delete "*", add "±"

18) Item 4.8.1.1.2g.1 delete "and"; add "or an appropriate mechanical method (such as pressure washing or manual wiping)."

19) Item 4.8.1.1.2g.2 delete this entire section which states "Performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code at a test pressure equal to 110% of the system design pressure."

20) Item 4.8.1.1.2h delete "."; add ",or with an appropriate mechanical method (such as pressure washing or manual wiping)."

21) Item 4.8.1.1.3 — add "(Not Used)" ; delete "All diesel generator failures, valid or nonvalid, shall be reported in a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days. Reports of diesel generator failures shall include the information recommended in Regulatory Position C.3.b of Regulatory Guide 1.108, Revision 1, August 1977. If the number of failures in the last 20 or 100 starts (on a per diesel generator basis) exceeds the criteria in Table 4.8-1, take the appropriate action specified in Table 4.8-1a and attachments thereto." ; delete all the information in Table 4.8-1 and the attachments to this table; add the notation "Not Used" in this table

The proposed changes to Waterford 3 Technical Specification Section 6.0 "Administrative Controls" are:

22) A new item is included in the Administrative Controls (6.8.4.h) to provide the requirements of the Fuel Oil Testing Program.

The proposed change includes additional clarifications to the BASES for Section 3/4.8 as appropriate.

Discussion

The proposed amendment to the Waterford 3 Technical Specifications (TS) will eliminate the excessive and unnecessary testing of the Emergency Diesel Generators (EDGs). The changes requested are consistent with a) the guidance provided in NUREG 1432, "Standard Technical Specifications Combustion Engineering Plants," Generic Letter (GL) 94-01, and GL 93-05, b) industry and Waterford 3 plant operating experience, and c) the licensing basis for Waterford 3.

Technical Specification 3.8.1.1 Actions a. and e. require all operable EDGs to be started as a demonstration of operability whenever one or more of the offsite AC power sources is declared inoperable. The proposed changes (changes 1 and 4 in the Description section) would eliminate the requirement to demonstrate the operability of an operable EDG whenever an offsite AC power source is determined to be inoperable. The inoperability of an offsite AC power source has no effect on the reliability of an EDG. Deleting this requirement does not affect the design or performance characteristics of the EDGs. The ability of the EDGs to perform the design function will not be affected. These proposed changes are line item improvements recommended by GL 93-05.

Technical Specification 3.8.1.1 Action b. requires the remaining operable EDG to be started as a demonstration of operability whenever one EDG is declared inoperable except for preplanned preventive maintenance or testing. Action c. requires the remaining operable EDG to be started as a demonstration of operability whenever one offsite A.C. circuit and one diesel generator is declared inoperable except for preplanned preventive maintenance or testing. The proposed changes (changes 2 and 3 in the Description section) would revise the testing exclusion to include an inoperable support system and an independently testable component. The addition of these testing exclusions will eliminate the need to test the EDG when the source of the inoperability originated in a support system, such as Component Cooling Water or in an independently testable component, such as a relay. The inoperability of these types of items does not reduce the reliability of the effected EDG to start, once the support system or component is declared operable. The proposed changes would also eliminate the testing requirements of the remaining operable EDG, when one of two EDGs is declared inoperable, if it can be demonstrated that there is no common mode failure for the remaining EDG. The normal Technical Specification surveillance testing schedule assures that operable EDGs are capable of performing the intended safety functions. A failure of one EDG does not reduce the reliability of the other operable EDG. Deleting this requirement does not affect the design or performance characteristics of the EDGs once the potential for a common mode failure has been dismissed. Therefore, the EDGs will maintain the ability to perform the design function. This proposed change is a line item improvement recommended by GL 93-05.

Technical Specifications 4.8.1.1.2a and 4.8.1.1.3 specify reporting requirements for valid and nonvalid EDG failures and the accelerated testing requirements due to these failures. The proposed changes (changes 5 and 21 in the Description section) would delete these requirements. Deleting these unnecessary testing requirements will increase EDG reliability by reducing the stresses on the EDGs. These proposed changes are consistent with the guidance in GL 94-01.

Technical Specification 4.8.1.1.2a.5 requires a fast loading test to be performed at least once every 184 days. The proposed change (change 7 in the Description section) eliminates this requirement. This change is consistent with the guidance provided in GL 93-05 which states that EDGs should be loaded in accordance with the manufacturer's recommendations for all test purposes other than the refueling outage loss of offsite power tests. The BASES have been revised to eliminate the reference to this requirement. Also, the loading range of 4200-4400 Kw specified in this TS has been changed to 4000-4400 Kw in the proposed amendment. This revised loading range is provided to avoid inadvertent overloading of the diesel generators. This inadvertent

overloading creates unnecessary wear and mechanical stress that adversely affects the reliability and longevity of the diesel generators. Industry experience has shown that a diesel generator operating at 90% of continuous design rating with temperatures, pressures, etc. within their normal ranges, will also operate at 100% of continuous design rating.

Technical Specification 4.8.1.1.2d.1 states in part "At least once per 18 months during shutdown by verifying the generator capability to reject a load of greater than or equal to 498 Kw (HPSI pump)...". The proposed change (change 9 in the Description section) would delete the reference to the HPSI pump. The intent of this TS is to require the EDG to reject the largest single load while maintaining specific voltage and frequency constraints. Waterford 3 personnel determined that a HPSI pump represents a load of 415 Kw and that the largest single load on the EDG at Waterford 3 is the Essential Chiller which requires 430 Kw under tornado/missile conditions. The difference between the specified 498 Kw load in TS and 430 Kw required by the Waterford 3 largest single load is a margin of conservatism. An alternate method of rejecting a load greater than or equal to 498 Kw has subsequently been developed by Waterford 3 personnel. Therefore, no change to the actual load rejection requirement is being requested and only the load rejection methodology has been changed. The BASES for this TS have been modified as part of this proposed amendment to clarify the 498 Kw load rejection requirement.

Technical Specifications 4.8.1.1.2d.3a, 4.8.1.1.2d.3b, 4.8.1.1.2d.5a, and 4.8.1.1.2d.5b reference a note which is located at the bottom of page 3/4 8-6. The note allows Waterford 3 to use testing and analysis as an acceptable alternative in lieu of the prescribed integrated tests for train AB A.C. ESF buses until startup from the refuel 7 outage. This alternative was approved by the Nuclear Regulatory Commission after Waterford 3 personnel discovered on September 7, 1994, that these integrated tests had not been performed for the train AB ESF components. The proposed changes (changes 11, 12, 13, and 14 in the Description section) will eliminate the note and all references to the note. Waterford 3 will perform the specified integrated tests during Refuel 7.

Technical Specification 4.8.1.1.2d.6 requires a simulated loss-of-offsite power test to be performed following the 24 hour test that is performed once every 18 months. The proposed change (change 15 in the Description section) would replace the simulated loss-of-offsite power test with the EDG start test specified in TS 4.8.1.1.2a.4. The note at the bottom of page 3/4 8-6 for this TS provides guidance for performing the EDG start test if this testing cannot be performed within 5 minutes of the completion of the 24 hour test. This note currently states that the EDG shall be operated for 1 hour or until the

internal operating temperatures have stabilized. The proposed change will modify this note to require the EDG to be operated for 2 hours or until the internal operating temperatures have stabilized. These changes are consistent with the guidance provided in GL 93-05. The proposed change will modify the 24 hour test to eliminate the requirement for the two hour test to be performed first. There is no technical basis for performing the two hour test first. This is purely an administrative change. Also, the loading range of 4200-4400 Kw specified in this TS and in the note at the bottom of page 3/4 8-6 for this TS has been changed to 4000-4400 Kw. This revised loading range is provided to avoid inadvertent overloading of the diesel generators. This inadvertent overloading creates unnecessary wear and mechanical stress that adversely affects the reliability and longevity of the diesel generators. Industry experience has shown that a diesel generator operating at 90% of continuous design rating with temperatures, pressures, etc. within their normal ranges, will also operate at 100% of continuous design rating.

Technical Specification 4.8.1.1.2c provides the requirements for sampling and testing of EDG fuel oil. The proposed changes (changes 8 and 22 in the Description section) would require the properties of new and stored fuel oil to be maintained in accordance with the Fuel Oil Testing Program. This Fuel Oil Testing Program will be described in Section 6.8.4.h of the Administrative Controls section of the Technical Specifications. These changes are in accordance with the recommendations of NUREG 1432 with one exception. NUREG 1432 requires new fuel oil to have a clear and bright appearance with proper color. The proposed change requires new fuel oil to have either a clear and bright appearance with proper color or a water and sediment content of less than or equal to 0.05 volume percent. This change to the NUREG 1432 recommendations is required because Waterford 3 sometimes utilizes a high sulfur content fuel oil which has a dye added. The dye identifies the fuel oil as being high sulfur content fuel oil and prevents the clear and bright test from being performed. The water and sediment content requirement is currently in the Waterford 3 TS and will be retained. The requirement that corrective actions shall be initiated within 72 hours to return the fuel oil supply to within acceptable limits, which is currently in the Technical Specifications, will be retained.

Technical Specifications 4.8.1.1.2g.1 and 4.8.1.1.2h specify that the fuel oil storage tanks should be cleaned using a sodium hypochlorite solution or equivalent. The proposed changes (changes 18 and 20 in the Description section) would also allow an appropriate mechanical method (such as pressure washing or manual wiping) to be used instead of the sodium hypochlorite solution or equivalent. The use of sodium hypochlorite or an equivalent for cleaning the fuel oil tanks is recommended in Regulatory Guide 1.137, "Fuel-Oil Systems for Standby Diesel Generators," Section C.2.f, to preclude the

introduction of surfactants in the fuel system. The use of sodium hypochlorite also provides a measure to control the micro-biological activity in the fuel oil. However, a potential exists for the generation of hazardous waste when sodium hypochlorite is used to clean the fuel oil storage tanks. The hazardous waste could be generated from the mixing of sodium hypochlorite and any fuel oil residue remaining in the storage tanks. Also, this change will eliminate the potential for residual sodium hypochlorite to oxidize diesel fuel thereby creating unwanted byproducts. The cleaning method in the proposed change will meet the requirements of Regulatory Guide 1.137 without the potential problems of waste disposal associated with the usage of sodium hypochlorite cleaning solutions. The diesel fuel oil program at Waterford 3 provides the biological control measures of the sodium hypochlorite solution. This program requires the addition of a fuel oil biocide to the fuel oil shipment prior to off loading the fuel oil into the storage tanks. In addition, this program provides a routine biomonitoring program for the stored fuel oil. Therefore, the intent of these TS will not be adversely affected by the proposed changes.

Technical Specification 4.8.1.1.2g.2 requires the performance of a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code at a test pressure equal to 110% of the system design pressure at least once every 10 years. The proposed change (change 19 in the Description section) would eliminate this requirement. The appropriate testing will be controlled by the Waterford 3 Inservice Inspection Program. This change is in accordance with the recommendations of NUREG 1432.

Technical Specification 4.8.1.1.2f currently requires the diesel generators to accelerate to at least 600 rpm (60 * 1.2 Hz) in less than or equal to 10 seconds. The proposed change (change 17 in the Description section) will replace the * with $\pm$. The * was inadvertently incorporated into the Waterford 3 Technical Specifications during the NRC's processing of amendment 92. This change is an administrative change only which will correct the error previously made and will not adversely affect the original intent of the Technical Specifications.

Technical Specification 4.8.1.1.2a.4 currently requires the diesel generators to achieve specific speed, voltage, and frequency constraints within 10 seconds when the diesel generators are started during performance of the monthly surveillance testing. The proposed change (change 6 in the Description section) would allow the diesel generators to be tested using "slow starts" during the monthly surveillance testing. Slow starts decrease the stress and wear on the diesel generators. The use of "slow starts" would improve the reliability and availability of the diesel generators. This portion of the change is in accordance with the recommendations of NUREG 1432.

In addition, TS 4.8.1.1.2a.4 has been modified to provide clarification for when the timed start (≤ 10 seconds) is satisfied. The timed start at Waterford 3 is satisfied when the EDG achieves 3920 volts and 58.8 Hz. At these values, the EDG output breaker permissives are satisfied; and on detection of a loss of power, the EDG breakers would close reenergizing the respective safety bus. Following the timed start, the steady state voltage and frequency will be required to be maintained at 4160 +420, -240 volts and 60 ± 1.2 Hz as currently specified in this Technical Specification.

Technical Specification 4.8.1.1.2d.2 currently requires the verification of the diesel generators capability to reject a load of 4400 kw without tripping. The proposed change (change 10 in the Description section) provides for a range to conduct this test. This revised loading range is intended to avoid inadvertent overloading of the diesel generators. This inadvertent overloading creates unnecessary wear and mechanical stress that adversely affects the reliability and longevity of the diesel generators.

Technical Specification 4.8.1.1.2d.7 states that a verification of auto-connected loads not exceeding the 2000 hour rating of 4400 kw for the EDG is required. This TS has been reworded to include a verification that auto-connected and permanently connected loads do not exceed the 2000 hour rating. This change (Change 16 in the Description section) provides clarification and is a purely an administrative change.

Safety Analysis

The proposed changes 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 an accident previously evaluated?

   Response: No

   The Standby Diesel Generators do not initiate any accidents, therefore the proposed changes do not increase the probability of an accident previously evaluated. The proposed changes to TS 3/4.8.1 and the associated BASES affect the required actions in response to inoperable offsite and onsite AC sources, Surveillance Requirements for the EDG, and reporting requirements for EDG failures. The majority of the proposed changes are based on the recommendations of NUREG 1432, GL 94-

01, and GL 93-05. These proposed changes have been extensively reviewed by the NRC during the preparation of these documents and by Waterford 3 SES during the development of this request for TS amendment. The proposed changes are expected to result in improvements in EDG performance and reduce EDG aging due to excessive testing. The proposed changes will permit the elimination of the unnecessary mechanical stress and wear on the EDGs while ensuring that the EDGs will perform their design function. The elimination of mechanical stress and wear will improve reliability and availability of the EDGs which will have a positive effect on the ability of the EDGs to perform their design function. The proposed changes do not affect the availability or the testing requirements of the offsite circuits.

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 changes to TS 3/4.8.1 and the associated Bases do not introduce any new modes of plant operation or new accident precursors, involve any physical alterations to plant configurations, or make any changes to system setpoints which could initiate a new or different kind of accident. The proposed changes do not affect the design or performance characteristics of any EDG or its ability to perform its design function. No new failure modes have been defined and no new system interactions have been introduced for any plant system or component. In addition, there have not been any new limiting failures identified as a result of the proposed changes. The proposed changes will eliminate unnecessary EDG testing and will increase EDG reliability and availability. This will have an overall positive affect on plant safety. Accidents concerning loss of offsite power and a single failure (e.g., loss of an EDG) have previously been evaluated. These changes are intended to improve plant safety, decrease equipment degradation, and remove an unnecessary burden on personnel resources by reducing the amount of testing that the TS requires during power operation. Relocating the diesel fuel oil testing requirements to the Waterford 3 Fuel Oil Testing Program outside of the Technical Specifications is an

administrative change only and consequently has no effect on accident probability, consequences, or margin. Also, the proposed cleaning method for the diesel fuel oil storage tanks meets the intent of Regulatory Guide 1.137 and will not result in the degradation of the fuel oil.

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

Under the proposed changes to TS 3/4.8.1 and the associated Bases, the EDGs will remain capable of performing their safety function. The changes do not affect the design or performance of the EDGs, but will increase EDG reliability and availability by reducing the stresses and the effects of aging on the EDG by eliminating unnecessary testing. This will result in an overall increase in plant safety. The ability of the EDGs to perform their safety function will not be degraded. Relocating the diesel fuel oil testing requirements to the Waterford 3 Fuel Oil Testing Program outside of the Technical Specifications is an administrative change only and consequently has no effect on accident probability, consequences, or margin. Also, the proposed cleaning method for the diesel fuel oil storage tanks meets the intent of Regulatory Guide 1.137 and will not result in a reduction in the margin of safety.

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.

NPF-38-172

ATTACHMENT A