



R. P. Barkhurst
Vice President
Operations
Waterford 3

W3F191-0618
A4.05
QA

May 5, 1992

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-38-122

Gentlemen:

Pursuant to Generic Letter 91-08 "Removal of Component Lists From Technical Specifications" dated May 6, 1991, Entergy Operations, Incorporated is requesting an amendment to remove the following component lists from the Technical Specifications.

Table 3.6-1	"Secondary Containment Bypass Leakage Paths"
Table 3.6-2	"Containment Isolation Valves"
Table 3.8-1	"Containment Penetration Conductor Overcurrent Protective Devices"
Table 3.8-2	"Motor-Operated Valves Thermal Overload Protection and/or Bypass Devices"

The proposed change is consistent with the guidance provided by Generic Letter 91-08, Enclosures 1 and 2. Upon approval, the component lists identified above will have been incorporated into a plant procedure subject to the change control provisions of Technical Specification 6.8. Any future change to these component lists will then be governed by 50.59 thus relieving the NRC and Entergy Operations Incorporated of the administrative burdens required to update TS component lists.

Please note that this request, which in part affects Limiting Condition For Operation (LCO) 3.6.3, will need to be coordinated with our previous request NPF-38-105 dated November 3, 1989 which also affects LCO 3.5.3.

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

Very truly yours,



RPB/PLC/dc

Attachment: Affidavit
NPF-38-122

cc: R.D. Martin, 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. 50-332
Waterford 3 Steam Electric Station)

AFFIDAVIT

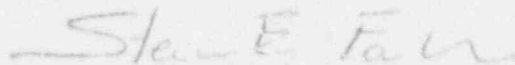
R.P. Barkhurst, being duly sworn, hereby deposes and says that he is Vice President Operations - Waterford 3 of Entergy Operations, Incorporated; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request NPP-38-122; that he 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 5TH day of MAY, 1992.



Notary Public

My Commission expires WITH LIFE.

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-122

This proposal requests a change to Waterford 3 Technical Specification (TS) in accordance with the guidance provided in Generic Letter (GL) 91-08.

Existing Specifications

See Attachment A

Proposed Specifications

See Attachment B

Description

Generic Letter 91-08 provides guidance to licensees for preparing an amendment request to remove component lists from the technical specifications. The change is described as a line-item TS improvement which will allow for maintaining component lists in appropriately controlled plant procedures.

The guidance requires amendment requests to address the following three elements:

- 1) Each TS should include an appropriate description of the scope of the components to which the TS requirements apply.
- 2) If the removal of a component list results in the loss of notes that modify or provide an exception to the requirements the specification should be revised to incorporate that modification or exception.
- 3) Licensees should confirm that the list of components removed from the TS are located in appropriately controlled plant procedures.

Generic Letter 91-08 Enclosure 1 provides guidance on the TS changes for specific lists of components. Enclosure 2 provides the applicable sections of the current standard technical specification requirements with the TS changes to allow the removal of component lists. The following describes changes to the Waterford 3 TS to remove those specific component lists addressed by Generic Letter 91-08 in conformance with Enclosures 1 and 2.

Containment Isolation Valves

LCO 3/4.6.3 for containment isolation valves was revised to state "Each containment isolation valve shall be Operable"; The reference to valves "specified in table 3.6-2" was removed from the LCO and the action statement. Similarly, the surveillance requirements for

(1) post-maintenance testing, (2) demonstrating automatic closure on isolation signals, and (3) confirming the isolation time of power-operated or automatic valves, were revised to remove the reference to Table 3.6-2 and to state "Each containment isolation valve shall..." and "...each power-operated or automatic containment isolation valve shall..."

Footnotes appearing in Table 3.6-2 were incorporated in the LCO. The footnote involving valves that are exempt from the requirements of TS 3.0.4 was added to the LCO by stating "The provisions of specification 3.0.4 do not apply". The footnote that addressed the operational consideration for specific valves which may be opened on an intermittent basis was added to the LCO by stating "Locked or sealed closed valves may be opened on an intermittent basis under administrative control". In addition, the definition of Containment Integrity (section 1.7) and surveillance requirement 4.6.1.1.a for demonstrating containment integrity were revised to remove the reference to table 3.6-2 and state..." except for valves that are open under administrative control as permitted by Specification 3.6.3."

A footnote appearing in Table 3.3-10 referring to Table 3.6.2 was revised to state "Containment isolation valves governed by specification 3.6.3". TS Basis 3/4.6.3 was revised in accordance with GL 91-08 to include considerations which constitute acceptable administrative control for opening locked or sealed closed containment isolation valves.

The above listed changes identify specific valves (containment isolation) by function rather than component number and therefore removal of the component list Table 3.6-2 is an acceptable alternative.

Secondary Containment Bypass Leakage Paths

The definitions of "secondary containment bypass leakage paths" and "penetrations and valves subject to type B and C tests" are adequately defined by the plant licensing basis such that the TS requirements do not require further clarification. Therefore references to Table 3.6-1 appearing in 3.6.1.2 (b) and (c) were removed. Specification 3.6.1.2.C was revised to state... "for all penetrations that are secondary containment bypass leakage paths."

Containment Penetration Conductor Overcurrent Protection Devices

The list of containment penetration conductor overcurrent protective devices includes those primary and backup fuses and breakers that preclude faults of a magnitude and duration that could compromise the integrity of electrical penetrations. Because the number of overcurrent protective devices associated with electrical circuits penetrating containment may exceed the basic requirements for primary and backup protection, the description of these components has been stated to clarify those components to which the TS requirements apply. Also, these requirements exclude circuits for which credible fault currents would not exceed the

electrical penetration design rating. For example, these requirements exclude thermocouple and other low-power-level signal circuits. The following statement replaces LCO 3/4 3.8.4.1 and removes previous reference to Table 3.8-1:

Primary and backup containment penetration conductor overcurrent protective devices associated with each containment electrical penetration circuit shall be OPERABLE. The scope of these protective devices excludes those circuits for which credible fault currents would not exceed the electrical penetration design rating.

The reference to Table 3.8-1 in Action statement (a) was removed without impacting the surveillance requirements.

Surveillance requirement 4.8.4.1 was revised to remove reference to Table 3.8-1 and state "The above noted primary and backup containment penetration..."

The statement appearing in surveillance 4.8.4.1.A.1B "...and as specified in Table 3.8-1" was removed without impact on the requirements.

The statement appearing in surveillance 4.8.4.1.A.2 "as noted on Table 3.8-1" was replaced with "...for those breakers with external protective relays*...".

A footnote stating "*Testing of these circuit breakers (i.e., the 480 volts power from low voltage switchgear) shall be performed in accordance with the vendor's calibration procedures" was added.

The change stated above incorporates an exception to the TS requirements in terms consistent with those recommended in GL 91-08.

Motor-Operated Valves Thermal Overload Protection

TS Table 3.8-2 lists valves that have thermal overload protection and bypass devices integral with the motor starter. The table lists the valves by number, function and the bypass device. LCO 3/4 3.8.2 was revised to remove reference to Table 3.8-2, and define the scope of valves that include these features by stating "The thermal overload protection and bypass devices, integral with the motor starter, of each valve used in safety systems shall be operable".

With the above changes the associated tables will be removed from the TS and replaced with a single page that notes the affected pages as "Not Used". The TS index has likewise been updated to remove all references to the associated Tables.

SAFETY ANALYSIS

Generic Letter 91-08 presents a review of the safety significance of proposals to remove component lists from the technical specifications. The staff concluded that "specifications may be stated in general terms that describe the types of components to which the requirements apply. This provides an acceptable

alternative to identifying components by their plant identification number as they are currently listed in tables of TS components. The removal of component lists is acceptable because it does not alter existing TS requirements or those components to which they apply." Therefore, no significant hazards consideration exists.

The Commission provided guidance concerning 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 (iv).

"(iv) A relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated. This assumes that the operating restriction and the criteria to be applied to a request for relief have been established in a prior review and that it is justified in a satisfactory way that the criteria have been met."

Generic Letter 91-08 describes a line item improvement to technical specifications applicable to Waterford. This proposal suggests incorporating the exact words used from Generic Letter 91-08 where applicable.

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.

ATTACHMENT A

NPF-38-122