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# UNITED STATES NUCLEAR REGULATORY COMMISSION

# ENTERGY OPERATIONS. INC.

# DOCKET NO. 50-382

# WATERFORD STEAM ELECTRIC STATION, UNIT 3

# AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 115 License No. NPF-38

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Entergy Operations, Inc. (the licensee) dated July 18, 1991, as supplemented by letters dated March 16, and December 2, 1994, and March 9, and August 30, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

9510100022 951004 PDR ADOCK 05000382 PDR  Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. NPF-38 is hereby amended to read as follows:

# (2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 115, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Chandu P. Patel

Chandu P. Patel, Project Manager Project Directorate IV-1 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: October 4, 1995

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# ATTACHMENT TO LICENSE AMENDMENT NO. 115

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# TO FACILITY OPERATING LICENSE NO. NPF-38

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Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the areas of change. The corresponding overleaf pages are also provided to maintain document completeness.

REMOVE PAGES	INSERT PAGES
3/4 7-16	3/4 7-16
3/4 7-17	3/4 7-17
3/4 7-18	3/4 7-18
	3/4 7-18a
	3/4 7-18b
	3/4 7-18c
-	3/4 7-18d
B 3/4 7-4a	B 3/4 7-4a
-	B 3/4 7-4b
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# 3/4.7.5 FLOOD PROTECTION

LIMITING CONDITION FOR OPERATION

3.7.5 Flood protection shall be provided for all safety-related systems, components, and structures when the water level of the Mississippi River exceeds +27.0 ft Mean Sea Level USGS datum, at the levee fronting the Waterford Unit 3 site.

# APPLICABILITY: At all times.

### ACTION:

With the water level at the levee fronting the Waterford Unit 3 site above elevation +27.0 ft Mean Sea Level USGS datum initiate and complete within 12 hours procedures ensuring that all doors and penetrations below the +30.0 ft elevation are secure.

#### SURVEILLANCE REQUIREMENTS

4.7.5 The water level at the levee fronting the Waterford Unit 3 site shall be determined to be within the limits by:

- a. Measurement at least once per 24 hours when the water level is equal to or above elevation +24.0 ft Mean Sea Level USGS datum and below elevation +27.0 ft Mean Sea Level USGS datum, and
- b. Measurement at least once per 2 hours when the water level is equal to or above elevation +27.0 ft Mean Sea Level USGS datum.

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3/4.7.6.1 CONTROL ROOM EMERGENCY AIR FILTRATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6.1 Both control room emergency air filtration trains (S-8) shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With one control room emergency air filtration train inoperable, either restore the inoperable train to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With both control room emergency air filtration trains inoperable, restore one train to OPERABLE status within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

# SURVEILLANCE REQUIREMENTS

- 4.7.6.1 Each control room air filtration train (S-8) shall be demonstrated OPERABLE:
  - a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 continuous hours with the heaters on.
  - b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:
    - Verifying that the filtration train satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 4225 cfm ±10%.
    - Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.

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SURVEILLANCE REQUIREMENTS (Continued)

- Verifying a system flow rate of 4225 cfm ±10% during train operation when tested in accordance with ANSI N510-1975.
- c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
- d. At least once per 18 months by:
  - Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 7.8 inches water gauge while operating the train at a flow rate of 4225 cfm ±10%.
  - Verifying that on a safety injection actuation test signal or a high radiation test signal, the train automatically switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks.
  - Verifying that heaters dissipate 10 (+0.5, -1.0) kW when tested in accordance with ANSI N510-1975.
- e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the train at a flow rate of 4225 cfm  $\pm 10\%$ .
- f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the train at a flow rate of 4225 cfm ±10%.

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3/4.7.6.2 CONTROL ROOM EMERGENCY AIR FILTRATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6.2 Two control room emergency air filtration trains (S-8) shall be OPERABLE.

APPLICABILITY: MODES 5 and 6.

#### ACTION:

- a. With one control room emergency air filtration system inoperable, restore the inoperable system to OPERABLE status within 7 days or initiate and maintain operation of the remaining OPERABLE control room emergency air filtration system in the recirculation mode.
- b. With both control room emergency air filtration systems inoperable, or with the OPERABLE control room emergency air filtration system, required to be in the recirculation mode by ACTION a, not capable of being powered by an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

# SURVEILLANCE REQUIREMENTS

4.7.6.2 The control room emergency air filtration trains (S-8) shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.7.6.1.

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# 3/4.7.6.3 CONTROL ROOM AIR TEMPERATURE

# LIMITING CONDITION FOR OPERATION

3.7.6.3 Two independent control room air conditioning units shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

#### ACTION:

- a. With one control room air conditioning unit inoperable, restore the inoperable unit to OPERABLE status within 7 days or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With two control room air conditioning units inoperable, return one unit to an OPERABLE status within 1 hour or be in HOT STANDBY within the next 5 hours and in COLD SHUTDOWN within the following 30 hours.

# SURVEILLANCE REQUIREMENTS

- 4.7.6.3 Each control room air conditioning unit shall be demonstrated OPERABLE:
  - a. At least once per 12 hours by verifying that the operating control room air conditioning unit is maintaining average control room air temperature less than or equal to 80°F.
  - b. At least quarterly, if not performed within the last quarter, by verifying that each control room air conditioning unit starts and operates for at least 15 minutes.

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3/4.7.6.4 CONTROL ROOM AIR TEMPERATURE

LIMITING CONDITION FOR OPERATION

3.7.6.4 Two independent control room air conditioning units shall be OPERABLE.

APPLICABILITY: MODES 5 and 6.

ACTION:

- a. With one control room air conditioning unit inoperable, restore the inoperable system to OPERABLE status within 7 days or initiate and maintain operation of the remaining OPERABLE control room air conditioning unit.
- b. With both control room air conditioning units inoperable, or with the OPERABLE control room air conditioning unit, required to be in operation by ACTION a, not capable of being powered by an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

# SURVEILLANCE REQUIREMENTS

4.7.6.4 The control room air conditioning units shall be demonstrated OPERABLE per the Surveillance Requirements of 4.7.6.3.

# 3/4.7.6.5 CONTROL ROOM ISOLATION AND PRESSURIZATION

LIMITING CONDITION FOR OPERATION

3.7.6.5 The control room envelope isolation and pressurization boundaries shall be OPERABLE.

APPLICABILITY: All MODES.

#### ACTION:

- a. With either control room envelope isolation valve in a normal outside air flow path inoperable, maintain at least one isolation valve in the flowpath OPERABLE, and either restore the inoperable valve to OPERABLE status with 7 days or isolate the affected flow path within the following 6 hours.
- b. With any Control Room Emergency Filter Outside Air Intake valve(s) inoperable, maintain at least one of the series isolation valves in a flowpath OPERABLE, and either restore the inoperable valve(s) to OPERABLE status within 7 days or isolate the affected flow path within the following 6 hours.
- c. With more than one Control Room Emergency Filter Outside Air Intake flow path inoperable, maintain at least one flow path per intake operable and restore an additional flow path to operable status within 7 days or, be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.
- d. With the control room envelope inoperable as a result of causes other than those addressed by ACTION (a), (b), or (c) above:
  - Within 1 hour and at least once per 12 hours thereafter while the control room envelope is inoperable, verify that the Emergency Breathing Airbanks pressure is greater than or equal to 1800 psig.
  - 2. MODES 1-4:
    - a. If the cause of control room envelope inoperability is due to a known breach in the envelope of less than or equal to one square foot total area or the breach is associated with a permanent sealing mechanism (e.g., blocking open or removing a door) then operation may continue for up to 7 days after the control room envelope is declared inoperable. Otherwise, be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

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# LIMITING CONDITION FOR OPERATION

### ACTION: (Continued)

- b. If the cause of control room envelope inoperability is unknown identify the cause within 48 hours. If the cause of the failure is due to a breach within the allowable limits of ACTION d.2.a then operation may continue for up to 7 days after the control room envelope is declared inoperable. Otherwise, be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.
- c. Should a toxic gas event occur, take immediate steps to restore control room envelope integrity.
- 3. MODES 5 and 6:
  - a. Suspend all operations involving CORE ALTERATIONS or positive reactivity changes and if a toxic gas event occurs, take immediate steps to restore control room envelope integrity.

#### SURVEILLANCE REQUIREMENTS

- 4.7.6.5 The control room envelope isolation and pressurization boundaries shall be demonstrated OPERABLE at least once per 18 months by:
  - a. Verifying that the control room envelope can be maintained at a positive pressure of greater than or equal to 1/8 inch water gauge relative to the outside atmosphere with a make-up air flowrate less than or equal to 200 cfm during system operation.
  - b. Verifying that on a toxic gas detection test signal, the system automatically switches to the isolation mode of operation.
  - c. Verifying that on a safety injection actuation test signal or a high radiation test signal, normal outside air flow paths isolate.

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#### RASES

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# 3/4.7.5 FLOOD PROTECTION

The limitation on flood protection ensures that facility protective actions will be taken in the event of flood conditions. The limit of elevation 27.0 ft Mean Sea Level is issed on the maximum elevation at which the levee provides protection, here and plant island structure provides protection to safety-related equipment up to elevation +30 ft Mean Sea Level.

### 3/4.7.6.1 and 3/4.7.6.2 CONTROL ROOM EMERGENCY AIR FILTRATION SYSTEM

During an emergency, both S-8 units are started to provide filtration and adsorption of outside air and control room envelope recirculated air (reference: FSAR 6.4.3.3). Dosages received after a full power design basis LOCA were calculated to be orders of magnitude higher than other accidents involving radiation releases to the environment (reference: FSAR Tables 15.6-18, 15.7-2, 15.7-4, 15.7-5, 15.7-7). Because the consequences of a full power design basis LOCA are more severe than those occurring during COLD SHUTDOWN and REFUELING, a separate specification, 3/4.7.6.2, requires only one OPERABLE S-8 unit to guard against accidents during Modes 5 and 6.

The OPERABILITY of this system and control room design provisions are based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criterion 19 of Appendix A, 10 CFR Part 50.

Operation of the system with the heaters on for at least 10 hours continuous over a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. Obtaining and analyzing charcoal samples after 720 hours of adsorber operation (since the last sample and analysis) ensures that the adsorber maintains the efficiency assumed in the safety analysis and is consistent with Regulatory Guide 1.52.

#### 3/4.7.6.3 CONTROL ROOM AIR TEMPERATURE

Maintaining the control room air temperature less than or equal to 80°F ensures that (1) the ambient air temperature does not exceed the allowable air temperature for continuous duty rating for the equipment and instrumentation in the control room, and (2) the control room will remain habitable for operations personnel during plant operation.

The Air Conditioning System is designed to cool the outlet air to approximately 55°F. Then, non-safety-related near-room heaters add enough heat to the air stream to keep the rooms between 70 and 75°F. Although 70 to 75°F is the normal control band, it would be too restrictive as an LCO. Control

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Letter dated: August 9, 1988

#### BASES

# CONTROL ROOM AIR TEMPERATURE (Continued)

Room equipment was specified for a more general temperature range to 45 to 120°F. A provision for the CPC microcomputers, which might be more sensitive to heat, is not required here. Since maximum outside air make-up flow in the normal ventilation mode comprises less than ten percent of the air flow from an AH-12 unit, outside air temperature has little affect on the AH-12s cooling coil heat load. Therefore, the ability of an AH-12 unit to maintain control room temperature in the normal mode gives adequate assurance of its capability for emergency situations.

#### 3/4.7.6.4 CONTROL ROOM ISOLATION AND PRESSURIZATION

This specification provides the operability requirements for the control room envelope isolation and pressurization boundaries. The Limiting Condition for Operation (LCO) specifies specific ACTION STATEMENTS for inoperable components of the control room ventilation systems, separate from the S-8 and AH-12 units. The operability of the remaining parts of the system affect the ability of the control room envelope to pressurize.

ACTION STATEMENTS a and b focus on maintaining isolation characteristics. The valves in the flow path referred to in ACTION a are HVC-102 & HVC-101. The Outside Air Intake (OAI) "series isolation valves" of ACTION b and c are as follows:

NORTH OAI - HVC-2028 & HVC-201A HVC-202A & HVC-201B SOUTH OAI - HVC-204B & HVC-203A HVC-204A & HVC-203B

ACTION STATEMENT c preserves the operator action (i.e., manually initiated filtered pressurization) that maintains the control room envelope at a position pressure during a radiological emergency. As indicated above each OAI series isolation valve is powered by the opposite train. With more than one OAI flow path inoperable a single failure (i.e., train A or B) could prohibit the ability to maintain the control envelope at a positive pressure. Therefore, in the specified condition, ACTION c requires an additional flow path to be returned to service within 7 days.

ACTION STATEMENT d.2.a is intended to address an intentional breach in the control room pressurization boundary as necessary to support maintenance or modification. A breach of this nature shall be limited in size and governed under administrative controls. The size restrictions as stated in the ACTION are such that should a toxic event occur control room integrity can be immediately restored as described below. ACTION STATEMENT d.2.b is intended to restore pressurization ability as soon as possible for unintended breaches in the envelope. The 48 hours to locate an unidentified breach is based on an

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#### BASES

# CONTROL ROOM ISOLATION AND PRESSURIZATION (Continued)

evaluation that considered troubleshooting tasks that would be performed as necessary should the integrity of the Control Room Envelope pressure boundary fall into question. Estimated times associated with each task were based on sound engineering judgement. The ACTION statements also recognize the MODEindependent nature of the toxic chemical threat and provides for operator protection in the event of a toxic chemical release concurrent with a breach in the control room envelope. In addition, provisions have been added to the specification that, in the event of a toxic chemical event that threatens control room habitability while in the ACTION statements, "immediate steps" will be initiated to place the plant in a safe condition. In this context, the phrase "immediate steps" is taken to mean that the operators should immediately take reasonable action to restore a known breach in the envelope to an air-tight condition. Amplifying instructions are provided in Waterford 3 Administrative procedures, which impose special controls for work that will breach the control room envelope.

# 3/4.7.7 CONTROLLED VENTILATION AREA SYSTEM

The OPERABILITY of the controlled ventilation area system ensures that radioactive materials leaking from the penetration area or the ECCS equipment within the pump room following a LOCA are filtered prior to reaching the environment. The operation of this system and the resultant effect on offsite dosage calculations was assumed in the safety analyses.