



**Entergy  
Operations**

Entergy Operations, Inc.  
P.O. Box B  
Kilgus, LA 70066  
Tel: 504-739-6661

**R. P. Barkhurst**  
Vice President  
Operations  
Waterford 3

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QA

September 2, 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-38-126

Gentlemen:

Entergy Operations, Incorporated hereby files an application for an amendment to the Waterford 3 Technical Specifications. The proposed change will revise the Administrative Controls Section of the Technical Specification by modifying PORC Composition to reflect a reorganization change.

Should you have any questions or require additional information, 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-38-126

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

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the matter of )  
 )  
Entergy Operations, Incorporated ) Docket No. 50-382  
Waterford 3 Steam Electric Station )

AFFIDAVIT

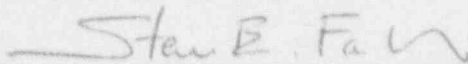
R.P. Barkhurst, being duly sworn, hereby deposes and says that he is Vice President Operations - Waterford 3 of Entergy Operations, Incorporated; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request NPF-38-126; that he 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 2<sup>ND</sup> day of SEPTEMBER, 1992.



\_\_\_\_\_  
Notary Public

My Commission expires WITH LIFE.

DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-38-126

This is a request to revise Section 6 (Administrative Controls) of the Technical Specifications.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Description

Technical Specification 6.5.1.2 provides the current Plant Operating Review Committee (PORC) Composition which includes the Plant Engineering Superintendent. Waterford 3 has eliminated this position and transferred the functional responsibilities to the Manager Technical Services who currently serves as PORC Chairman. Previously five engineering groups reported to the Plant Engineering Superintendent who reported to the Manager Technical Services. Under the new organization the Plant Engineering groups will report directly to the Manager Technical Services. Waterford 3 will accommodate the vacant PORC position with one of the engineering supervisors from one of the respective engineering groups. To allow for diversity, the membership title designating this position has been revised to read Management Knowledgeable in Engineering which is similar to the membership title for the Quality Assurance Organization. As a result of this change the Plant Engineering Organization will be represented on PORC by the Manager Technical Services and an engineering supervisor. In addition the proposed revision of the Technical Specifications will eliminate a designated PORC Vice Chairman (previously the Plant Engineering Superintendent). Either the Manager Technical Services or the Manager Operations and Maintenance will be PORC Chairman. In absence of the PORC Chairman the General Manager Plant Operations will appoint a temporary chairman. These proposed changes introduce no reduction in commitment, involving for the most part a change in functional responsibilities.

## 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 has no effect the assumptions contained in the safety analysis. The Technical Specifications which preserve the safety analysis assumptions are likewise unaffected by the proposed change. Therefore, the proposed change will not result in any 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 kind of accident from any accident previously evaluated?

Response: No

The proposed change is administrative in nature and will not alter operation of the plant or effectiveness of PORC. 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 the proposed change involve a significant reduction in a margin of safety?

Response: No

The Waterford 3 safety margins are defined and maintained by the Technical Specifications in Sections 2-5 which are unaffected by the proposed change. Therefore, the proposed change will not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of 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 (i).

- (i) A purely administrative change to technical specifications (i.e., a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature);

#### Safety and Significant Hazards Determination

"Based on the above safety analysis, it is concluded that: (1) the proposed changes do 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 changes; and (3) this action will not result in a condition that significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.



Attachment A

NPF-38-125