



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 146 TO

FACILITY OPERATING LICENSE NO. NPF-38

ENTERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION

By application dated October 16, 1996, as supplemented by letters dated December 22, 1997, and May 27, 1998, Entergy Operations, Inc. (the licensee), submitted a request for changes to the Waterford Steam Electric Station, Unit 3, (Waterford 3) Technical Specifications (TSs). The requested changes would relocate certain administrative controls to the Quality Assurance Program Manual (QAPM) as described in Administrative Letter (AL) 95-06, "Relocation of Technical Administrative Controls related to Quality Assurance;" change shift coverage from 8-hour day, 40-hour weeks to an option of 8 or 12 hour days and nominal 40-hour weeks; and make editorial changes to the titles of certain organizational positions. The December 22, 1997, and May 27, 1998, letters provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

2.1 Relocation of Administrative Controls to the Quality Assurance Program Manual

The NRC staff has reviewed the licensee's relocation of four TS sections to the QAPM. These sections include: 1) TS section 6.2.3, Independent Technical Reviews, 2) TS sections 6.8.2 and 6.8.3, requirements related to procedure reviews, and 3) TS section 6.10, Records retention. As discussed in AL 95-06, the above three areas are appropriate to relocate from the TS to the QAPM.

Section 182a of the Atomic Energy Act (the "Act") requires that applicants for nuclear power plant operating licenses state TSs and that the TSs be included as part of the license. The Commission's regulatory requirements related to the content of the TS are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCO's); (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS.

The Commission has provided guidance for the contents of TS in its "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" ("Final Policy Statement"),

58 Federal Register (FR) 39132 (July 22, 1993), which was codified in 10 CFR 50.36. The four criteria to be used in determining whether particular safety functions are required to be included in the TS are as follows: (1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary, (2) process variable, design feature, or operating restriction that is an initial condition of a Design-Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier, (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design-Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier, or (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

The Final Policy Statement also indicates that those existing TS LCOs which do not satisfy these four specified criteria may be relocated to the Updated Final Safety Analysis Report (UFSAR), such that future changes could be made to these provisions pursuant to 10 CFR 50.59. Other requirements may be relocated to more appropriate documents (e.g., Security Plan, Quality Assurance Plan (QAP), or Emergency Plan) and controlled by the applicable regulatory requirement. Similarly, while the required content of TS administrative controls is specified in 10 CFR 50.36(c)(5), particular details of administrative controls may be relocated to licensee-controlled documents where 10 CFR 50.54, 10 CFR 50.59, or other regulations provide adequate regulatory control.

While the criteria specifically apply to LCOs, in adopting the revision to the rule the Commission indicated that the intent of these criteria can be utilized to identify the optimum set of administrative controls in the TS and to eliminate redundancy to other regulations, (60 FR 36957). Addressing administrative controls, 10 CFR 50.36 states that they "are the provisions relating to organization and management, procedures, record keeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." The specific content of the administrative controls section of the TS is, therefore, that information that the Commission deems necessary to assure operation of the facility in a safe manner that is not already adequately covered by other regulations. Accordingly, the staff has determined that the requirements that are not specifically required under 10 CFR 50.36(c)(5) and which are not otherwise necessary to assure operation of the facility in a safe manner be removed from administrative controls.

The relocation was a verbatim shift of text material from the TS to the QAPM and therefore implements the Commission's regulations pertaining to 1) Independent Technical Reviews, 2) requirements related to procedure reviews, and 3) maintenance of records related to activities affecting quality. The required controls related to the above three areas are specified in various regulations such as 10 CFR 50.59 and 10 CFR 50.54(a) and the provisions incorporated into the QAPM are considered to be redundant to the requirements currently in TS. The staff has determined that these requirements are adequately addressed by existing regulations; which include but are not limited to 10 CFR Part 50 Appendix B, 10 CFR 50.71, and 10 CFR Part 20 subpart L; and the QAPM and that it is not necessary to include redundant or additional requirements in the TS administrative controls.

The staff concludes that the regulatory requirements under 10 CFR Part 50, Appendix B provide sufficient control of these administrative controls, and sufficient regulatory controls exist for future changes to the program pursuant to 10 CFR 50.54(a), such that removing these provisions from TS is acceptable.

2.2 Change in Shift Coverage

The licensee proposes to change TS 6.2.2.e from an 8-hour shift to an 8- or 12-hour shift. The NRC staff has previously approved the use of 12-hour shifts at other U.S. commercial nuclear power plants and has found no evidence of adverse effects on plant safety resulting from the use of such shifts. All other existing provisions concerning consecutive hours of work, overtime, and breaks remains unchanged. Thus, the proposed change does not alter the intent of the existing specification with respect to the number of hours that should normally be worked per week and Waterford 3 will continue to provide adequate assurance that routine heavy use of overtime will not be necessary to provide adequate shift coverage.

The NRC staff finds the proposed changes to be consistent with Section 5.2.2.e of NUREG-1432, Rev. 1, "Standard Technical Specifications, Combustion Engineering Plants" which indicates that licensees have the option of specifying either an 8-hour or a 12-hour shift.

The proposed amendment is consistent with current licensing practices and operating experience. The revised shift working hours remain within limits demonstrated acceptable by operating experience. Accordingly, the proposed change in shift coverage (TS 6.2.2.e) is acceptable.

2.3 Changes to the Titles of Organizational Positions

The content of TS 6.2.1.b and TS 6.2.1.c have been reversed. Proposed changes to TS 6.2.2.e.4 deletes references to the titles of the direct reports to the General Manager Plant Operations and replaces with "or designee." Proposed changes to TS 6.1.2, Table 6.2.1, TS 6.2.4 and TS 6.12.2 insert Shift Superintendent in lieu of Shift Supervisor. Proposed changes to TS 6.13.2.b and TS 6.14.2.b insert General Manager Plant Operations in lieu of Plant Manager. The two title changes reflect the current Waterford 3 organization. All of these administrative changes are consistent with safe operation and are therefore acceptable.

In addition, as requested in the December 22, 1997, submittal, the change to TS 6.2.2.f requires either the Operations Manager or the Operations Superintendent to hold a senior reactor operator (SRO) license. As stated in the May 27, 1998, submittal, "... the organizational alignment will be such that the position having direct oversight of the operating shifts will be staffed by an individual holding an SRO license." This fulfills the requirements in 10 CFR 50.54(l) and thus this change is acceptable.

Based on the above, the staff concludes that the proposed modifications to the Waterford 3 TSs meet the intent of the relevant review criteria and are therefore acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Louisiana State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment changes the recordkeeping, reporting, or administrative procedures or requirements. Accordingly, this meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: October 19, 1998