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Waterford 3

W3F1-99-0111
A4.05
PR

July 15, 1999

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-38-216
Administrative Controls Section 6.0 Technical
Specification Changes

Gentlemen:

In accordance with 10CFR50.90, Entergy is hereby proposing to amend Operating License NPF-38 for Waterford 3 by requesting NRC Staff review and approval of the attached changes to the Technical Specifications (TS). The attached description and safety analysis support the proposed changes to the Waterford 3 TS. One proposed change adds a TS Bases Control Program to the Waterford 3 TS Administrative Controls Section. The TS Bases Control Program change is modeled after the guidelines contained in Section 5.5.14 of NUREG 1432, "Standard Technical Specifications - Combustion Engineering Plants."

In addition to the above, another change is being proposed to correct an editorial error identified in the TS following issuance of Amendment 146, dated October 19, 1998. The amendment relocated certain administrative controls as described in NRC Administrative Letter 95-06, "Relocation of Technical Administrative Controls related to Quality Assurance," to the Quality Assurance Program Manual (QAPM). The proposed change will replace the wording "Specification 6.10.3p", in Section 6.13.2.a. and 6.14.2.a, with the wording "the Quality Assurance Program Manual."

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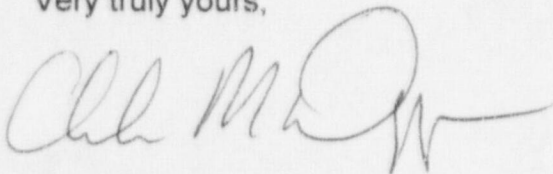
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These proposed changes have been evaluated in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c), and it has been determined that this request involves no significant hazards consideration.

The circumstances surrounding these changes do not meet the NRC's criteria for exigent or emergency review. However, due to the need for the Bases Control Program and the editorial error correction, we respectfully request an expeditious review. Entergy Operations requests the effective date for these changes to be within 60 days of approval.

All of the commitments contained in this submittal are identified on the attached Commitment Identification/Voluntary Enhancement Form. Should you have any questions or comments concerning this request, please contact E.P. Perkins at (504) 739-6379 or Ron Williams at (504) 739-6255.

Very truly yours,



C.M. Dugger
Vice President, Operations
Waterford 3

CMD/RLW/rtk

Attachments: Affidavit
NPF-38-216

cc: E.W. Merschhoff, NRC Region IV
C.P. Patel, NRC-NRR
J. Smith
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

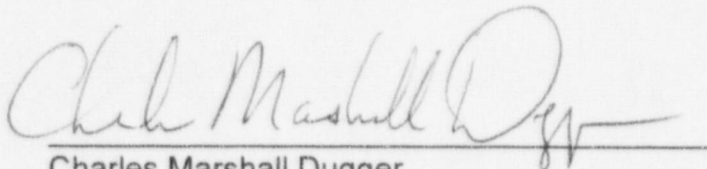
Entergy Operations, Incorporated
Waterford 3 Steam Electric Station

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Docket No. 50-382

AFFIDAVIT

Charles Marshall Dugger, 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-38-216; 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.



Charles Marshall Dugger
Vice President Operations - Waterford 3

STATE OF LOUISIANA

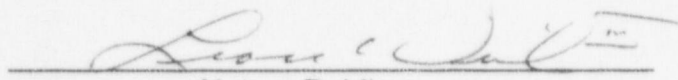
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PARISH OF ST. CHARLES

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Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 15th day of July, 1999.



Notary Public

My Commission expires at death.

DESCRIPTION AND NO SIGNIFICANT HAZARDS CONSIDERATION
DETERMINATION OF PROPOSED CHANGE NPF-38-216

Summary of Proposed Changes

The first proposed change adds a Technical Specifications (TS) Bases Control Program to the Administrative Controls section of the TS and also incorporates the new section into the index. The proposed change is modeled after the guidelines contained in Section 5.5.14 of NUREG 1432, "Standard Technical Specifications - Combustion Engineering Plans."

The second proposed change corrects an editorial error identified in the Technical Specifications following issuance of Amendment 146, dated October 19, 1998. The proposed change will replace the wording "Specification 6.10.3p", in Sections 6.13.2.a. and 6.14.2.a, with the wording "the Quality Assurance Program Manual."

These changes will have no adverse effect on the safe operation of Waterford 3.

Existing Specification

See Attachment A

Proposed Marked-up Specification

See Attachment B

Proposed Specification

See Attachment C

Commitment Identification/Voluntary Enhancement Form

See Attachment D

Background

Proposed Change 1

The "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" was published in the Federal Register on July 22, 1993 (58 FR 39132) to establish a specific set of objective criteria as guidance for determining which regulatory requirements and operating restrictions should be included in Technical Specifications. The policy encouraged the licensees to implement a voluntary program to update their TS to be consistent with improved vendor-specific Standard Technical Specifications (STS) issued by the NRC in September 1992. The policy further states that licensees may adopt portions of the improved Standard Technical Specifications (STS) along with all related requirements without fully implementing all the STS improvements. The commission concluded that safety benefits could be realized by allowing licensees to improve portions of their Technical Specifications by the use of the improved STS as a basis for plant-specific Technical Specification changes.

The applicable improved vendor specific STS for Waterford 3 is NUREG 1432, "Standard Technical Specifications - Combustion Engineering Plants." The STS Administrative Controls section 5.5.14 contains the Technical Specifications Bases Control Program that provides a formal means for processing changes to the Bases of the Technical Specifications. This proposed TS change would add these Bases Control Program requirements to the Waterford 3 Technical Specifications Administrative Controls Section. The Waterford 3 request for the addition of a TS Bases Control Program is similar to the license amendment issued to Calvert Cliffs Nuclear Power Plants Unit No. 1 & 2 on August 26, 1996.

Proposed Change 2

Waterford 3 submitted Technical Specification Change Request NPF-38-186, letter number W3F1-96-0176 dated October 16, 1996, to relocate certain administrative controls to the Quality Assurance Program Manual (QAPM) as described in NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." The letter identified certain activities related to record retention that may be moved from the Technical Specification to the Quality Assurance Program. As part of this license change request, Section 6.10, Record Retention, was requested to be relocated to the QAPM and replaced with the words "Not Used". In response to the Waterford 3 request for this Technical Specification change, the NRC Staff issued Amendment No. 146 on October 19, 1998. This proposed TS change would correct an editorial error identified in the Technical Specifications following issuance of Amendment 146. The proposed change will replace the wording "Specification 6.10.3p", in Sections 6.13.2.a. and 6.14.2.a, with the wording "the Quality Assurance Program Manual."

Description and Safety Considerations

Proposed Change 1

The proposed change would add a Technical Specifications Bases Control Program to the Waterford 3 Technical Specifications Administrative Controls Section of the TS, as Section 6.17, and also incorporate the Specification into the index. The proposed change is modeled after the guidelines contained in Section 5.5.14 of NUREG 1432, "Standard Technical Specifications - Combustion Engineering Plants." The purpose of this program is to provide a formal means for processing changes to the Bases that do not presently exist. These controls shall define the appropriate methods and reviews required to implement a TS Bases change and ensure that such changes do not constitute an unreviewed safety question or a change to the Technical Specifications.

The Bases, pursuant to 10 CFR 50.36(a), is not considered part of the TS and as such does not require NRC approval prior to implementation, provided the change is not an unreviewed safety question or causes a change to the TS. While NRC approval of Bases changes is not presently required as defined in 10 CFR 50.59, the NRC controls the issuance of the Bases pages. Having a program to process TS Bases changes provides additional administrative control and allows Waterford 3 to issue the Bases changes without NRC involvement. Changes to the Bases implemented under the Bases Control Program shall be provided to the NRC on a frequency consistent with 10CFR 50.71(e).

The TS Bases Control Program for Waterford 3 shall contain provisions to ensure that proposed TS Bases changes that involve a change to the Technical Specifications or a change to the UFSAR or Bases involving an unreviewed safety question shall be reviewed and approved by the NRC prior to implementation. In addition, the TS Bases Control Program shall contain provisions to ensure Bases changes are maintained consistent with the Updated Final Safety Analysis Report.

Proposed Change 2

The proposed change is purely administrative in nature. It will correct an editorial error identified in the TS following issuance of Amendment 146, dated October 19, 1998. The proposed change will replace the wording "Specification 6.10.3p" in Section 6.13.2.a. and 6.14.2.a, with the wording "the Quality Assurance Program Manual." The original TS change request did not include this editorial change to delete the reference to Specification 6.10.3p, record retention requirements for records of reviews performed on changes to the PCP and ODCM, from the TS and replace it with the reference to the QAPM. The new Entergy common QAPM specifies in Table 1, "Regulatory Commitments," Section C.9 that on-site safety review committee (PORC) will review new and revised station administrative procedures. The PCP and ODCM procedures, RW-001-210, "Process Control

Program," and UNT-005-014, "Offsite Dose Calculation Manual," respectively, are designated as administrative procedures and therefore require PORC review. The record retention requirement for meeting minutes of the Plant Nuclear Safety Committee (PORC) is specified in ANSI N45.2.9-1974, Appendix A, record type A.6. Entergy complies with Regulatory Guide 1.88, Rev. 2, October 1976 and ANSI N45.2.9-1974 as referenced in Regulatory Commitments Sections A.7 and Table 1, Section J of the QAPM. This change will have no adverse effects on the safe operation of Waterford 3.

No Significant Hazards Consideration Determination

Energy Operations, Inc is proposing that the Waterford 3 Technical Specifications be amended to add the Technical Specifications Bases Control Program to the TS Administrative Controls Section 6.0 and to correct an editorial error identified in the Technical Specifications following issuance of Amendment 146.

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:

The proposed changes to the Waterford 3 Technical Specifications add a TS Bases Control Program and correctly reference the appropriate document where administrative controls were relocated. The TS Bases Control Program will provide administrative controls that ensure changes to the TS Bases are appropriately reviewed and consistent with the Updated Final Safety Analysis Report (UFSAR). The addition of the proposed program does not affect any accident initiator or mitigation of any events analyzed in Chapter 15 of the UFSAR. Also, neither change has any affect on the operation of any structures, systems, or components or the assumptions of any accident analyses.

The TS Bases Control Program will ensure that any change to the Bases that involves an unreviewed safety question will receive prior Nuclear Regulatory Commission approval. Changing the reference to the Quality Assurance Program Manual (QAPM) for the item relocated to the QAPM is purely administrative.

Therefore, the proposed changes 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:

The proposed changes to the Waterford 3 TS add a TS Bases Control Program and correctly reference the appropriate document where administrative controls were relocated. The addition of a TS Bases Control Program represents an administrative function performed under existing regulatory controls consistent with 10CFR50.59. The proposed change to reference the appropriate document where an administrative control was relocated is purely administrative in nature. The change merely corrects the Technical Specifications wording to reflect the actual location of the record retention requirements for records of reviews performed on changes to the Process Control Plan (PCP) and Offsite Dose Calculation Manual (ODCM) in the QAPM.

These proposed changes do not involve a change in plant design or affect the configuration or operation of any structure, system, or component, nor does it involve any potential initiating events that would create any new or different kind of accident. Therefore, the proposed changes 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:

The proposed changes to the Waterford 3 TS add a TS Bases Control Program and correctly reference the appropriate document where administrative controls were relocated. The addition of a TS Bases Control Program is an administrative change and has no effect on a margin of safety, as defined by Section 2 of the TS. The only effect of the TS Bases Control Program is to establish controls over how TS Bases changes are reviewed and implemented consistent with 10 CFR 50.59.

The proposed change to a reference in the Administrative Controls section merely corrects the TS wording to reflect the actual location of the record retention requirements for records of reviews performed on changes to the PCP and ODCM in the QAPM.

These proposed changes do not involve a change in plant design or have any affect on the plant protective barriers. Therefore, the proposed changes will not involve a significant reduction in a margin of safety.

Safety and Significant Hazards Determination

Based on the above No Significant Hazards Evaluation, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined by 10 CFR 50.92; (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.