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10 CFR 50.90

W3F1-2021-0027

April 8, 2021

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Supplement to Application for Technical Specification Change to Adopt Risk-Informed Extended Completion Times – RITSTF Initiative 4b

Waterford Steam Electric Station, Unit 3
NRC Docket No. 50-382
Renewed Facility Operating License No. NPF-38

- References:
1. Letter from R.W. Gaston (Entergy Operations, Inc) to U.S. Nuclear Regulatory Commission, "Application for Technical Specification Change to Adopt Risk-Informed Extended Completion Times – RITSTF Initiative 4b," ADAMS Accession No. ML21039A648, dated February 8, 2021
 2. Letter from P.H. Buckberg (U.S. Nuclear Regulatory Commission) to Site Vice President (Entergy Operations, Inc), "Waterford Steam Electric Station, Unit 3 – Supplemental Information Needed for Acceptance of Requested Licensing Action Regarding Adopting Risk-Informed Completion Times (EPID L-2021-LLA-0014)," ADAMS Accession No ML21069A211 dated March 25, 2021

In Reference 1, Entergy Operations, Inc (Entergy) requested an amendment to the Renewed Facility Operating License No. NPF-38 for Waterford Steam Electric Station, Unit 3 (Waterford 3). The proposed amendment would modify TS requirements to permit the use of Risk Informed Completion Times with the implementation of Nuclear Energy Institute (NEI) 06-09, "Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines."

In Reference 2, the NRC requested that Entergy provide supplemental information by April 9, 2021 to support the acceptance review of the request. Attachment 1 to this letter provides the requested supplemental information to address the acceptance review information insufficiencies. Attachment 2 provides revised Technical Specification markup pages.

Entergy has reviewed the information supporting a finding of no significant hazards consideration that was previously provided to the NRC in Attachment 1 of Reference 1 and has concluded that the information provided in this supplement does not affect the bases for

concluding that the proposed license amendment does not involve a significant hazards consideration using the standards in 10 CFR 50.92.

In accordance with 10 CFR 50.91(b)(1), "Notice for Public Comment; State Consultation," a copy of this letter is being provided to the designated Louisiana Official.

This letter contains no new commitments.

If you have any questions or require additional information, please contact Paul Wood, Regulatory Assurance Manager, at 504-464-3786.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 8, 2021.

Respectfully,



Ron Gaston

RWG/ajh

Attachments: 1. Information to Address Acceptance Review Information Insufficiencies
 2. Revised Technical Specification Markup Pages

cc: NRC Region IV Regional Administrator
 NRC Senior Resident Inspector
 Louisiana Department of Environmental Quality
 NRC Project Manager

Attachment 1

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Information to Address Acceptance Review Information Insufficiencies

Information to Address Acceptance Review Information Insufficiencies

Requested Information

In Reference 1, Entergy Operations, Inc (Entergy) requested approval for proposed amendment to the Technical Specifications (TS), Appendix A of Renewed Facility Operating License No. NPF-38 for Waterford Steam Electric Station, Unit 3 (Waterford 3). The proposed amendment would modify the TS requirements related to completion times (CTs) for required actions (RAs) to provide the option to calculate a longer, risk-informed CT (RICT).

In Reference 2 the NRC requested that Entergy provide supplemental information to support the acceptance review of the license amendment request. A restatement of the NRC's requests followed by Entergy's responses is provided below.

NRC Request 1

1. Technical information included for proposed changes to TS Action 3.6.1.3.b lacks justification that a containment air lock inoperable for reasons other than an inoperable air lock door is not a condition in which all required trains or subsystems of a TS required system are inoperable, as discussed in Table 1, "Conditions Requiring Additional Technical Justification," of Technical Specifications Task Force (TSTF) Traveler 505 TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times – RITSTF [Risk-Informed TSTF] Initiative 4b."

Entergy Response 1

1. Entergy is withdrawing TS Action 3.6.1.3.b from the scope of this amendment request. Attachment 2 contains the revised markup of TS 3.6.1.3 indicating the RICT program will only apply to Action "a".

NRC Request 2

2. Technical information included for proposed changes to TS Action 3.7.1.2.b, which are beyond the scope of TSTF-505, Revision 2, lacks justification that the safety function of delivering feedwater to an intact steam generator could be accomplished at the rate specified for the limiting small feedwater system pipe break accident described in Section 15.2.3, "Limiting Faults," and Table 15.2-9a, "Assumptions for the Large Feedwater System Pipe Break," of the Waterford 3 Updated Final Safety Analysis Report.

Entergy Response 2

2. Entergy is withdrawing TS Action 3.7.1.2.b from the scope of this amendment request. Attachment 2 contains the revised markup of TS 3.7.1.2 indicating that the RICT program will only apply to Actions "a" and "d".

NRC Request 3

3. Technical information included for proposed changes to TS Action 3.7.1.3, which are beyond the scope of TSTF-505, Revision 2, lacks justification that the safety function of delivering adequate condensate to the emergency feedwater pumps' suctions could be accomplished in the required time with makeup to the condensate storage pool (CSP) from the cooling tower basin(s) without an alternate specified minimum CSP volume.

Entergy Response 3

3. Entergy is withdrawing TS Action 3.7.1.3 from the scope of this amendment request.

NRC Request 4

4. Technical information included for proposed changes to TS Action 3.7.1.6, which are beyond the scope of TSTF-505, Revision 2, lacks justification that the safety function of isolating main feedwater flow could be accomplished without reliance on components (i.e., main feedwater regulatory valves or feedwater pump trip) not controlled by TSs.

Entergy Response 4

4. Entergy is withdrawing TS Action 3.7.1.6 from the scope of this amendment request.

References

1. Letter from R.W. Gaston (Entergy Operations, Inc) to U.S. Nuclear Regulatory Commission, "Application for Technical Specification Change to Adopt Risk-Informed Extended Completion Times – RITSTF Initiative 4b," ADAMS Accession No. ML21039A648, dated February 8, 2021
2. Letter from P.H. Buckberg (U.S. Nuclear Regulatory Commission) to Site Vice President (Entergy Operations, Inc), "Waterford Steam Electric Station, Unit 3 – Supplemental Information Needed for Acceptance of Requested Licensing Action Regarding Adopting Risk-Informed Completion Times (EPID L-2021-LLA-0014), " ADAMS Accession No ML21069A211, dated March 25, 2021

Attachment 2

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Revised Technical Specification Markup Pages

TS Pages

3/4 6-9 (TS 3.6.1.3)

3/4 7-4 (TS 3.7.1.2)

CONTAINMENT SYSTEMS

CONTAINMENT AIR LOCKS

LIMITING CONDITION FOR OPERATION

3.6.1.3 Each containment air lock shall be OPERABLE with:

- a. Both doors closed except when the air lock is being used for normal transit entry and exit through the containment, then at least one air lock door shall be closed, and
- b. An overall air lock leakage rate in accordance with the Containment Leakage Rate Testing Program.

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

ACTION:

- a. With one containment air lock door inoperable:
 - 1. Maintain at least the OPERABLE air lock door closed and either restore the inoperable air lock door to OPERABLE status within 24 hours or lock the OPERABLE air lock door closed.
 - 2. Operation may then continue until performance of the next required overall air lock leakage test provided that the OPERABLE air lock door is verified to be locked closed at least once per 31 days.
 - 3. Otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
 - 4. The provisions of Specification 3.0.4 are not applicable.
- b. With the containment air lock inoperable, except as the result of an inoperable air lock door, maintain at least one air lock door closed; restore the inoperable air lock to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

INSERT 1

Insert 1:
or in accordance with the Risk Informed
Completion Time Program

Insert 1:
or in accordance with the Risk Informed
Completion Time Program

PLANT SYSTEMS

EMERGENCY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 Three emergency feedwater (EFW) pumps and two flow paths shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

INSERT 1



ACTION:

- a. With one steam supply to the turbine-driven EFW pump inoperable, restore the steam supply to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. With one steam supply to the turbine-driven EFW pump and one motor-driven EFW pump inoperable and the EFW flow paths able to deliver at least 100% flow to their respective steam generators, restore the steam supply or motor-driven EFW pump to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- c. With one steam supply to the turbine-driven EFW pump and both motor-driven EFW pumps inoperable and the EFW flow paths able to deliver at least 100% flow to their respective steam generators, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- d. With the EFW system inoperable for reasons other than those described in ACTION (a), (b), or (c), and able to deliver at least 100% flow to either steam generator, restore the EFW system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- e. With the EFW system inoperable for reasons other than those described in ACTION (a), (b), or (c), and able to deliver at least 100% combined flow to the steam generators, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- f. With the EFW system inoperable and unable to deliver at least 100% combined flow to the steam generators, immediately initiate action to restore the ability to deliver at least 100% combined flow to the steam generators. LCO 3.0.3 and all other LCO ACTIONS requiring MODE changes are suspended until the EFW system is capable of delivering at least 100% combined flow to the steam generators.
- g. Only as allowed by Surveillance Requirements 4.7.1.2(b) and 4.7.1.2(c), the provisions of Specifications 3.0.4 and 4.0.4 are not applicable to the turbine-driven EFW pump for entry into Mode 3.