



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

July 25, 2025

Site Vice President
Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3
17265 River Road
Killona, LA 70057-3093

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - ISSUANCE OF
AMENDMENT NO. 274 RE: EXTENSION OF ALLOWABLE OUTAGE TIMES
FOR ONE OR MORE CONTROL ROOM AIR CONDITIONING UNITS
INOPERABLE (EPID L-2024-LLA-0151)

Dear Sir or Madam:

The U.S. Nuclear Regulatory Commission (NRC, the Commission) has issued the enclosed Amendment No. 274 to Renewed Facility Operating License No. NPF-38 for the Waterford Steam Electric Station, Unit 3 (Waterford 3). This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated October 16, 2024, as supplemented by letter dated April 15, 2025.

The amendment revises current technical specification (TS) 3.7.6.3, "Control Room Air Temperature - Operating" and TS 3.7.6.4, "Control Room Air Temperature – Shutdown," by extending the completion time (CT) for one inoperable control room air conditioning unit from 7 days to 30 days and the CT when both control room air conditioning units are inoperable from 1 hour to 24 hours. Additionally, the current Waterford 3 TSs separate control room air conditioning unit requirements into separate mode dependent specifications (operating and shutdown). This request combines current TS 3.7.6.3 and TS 3.7.6.4 into a single specification, proposed TS 3.7.6.3 "Control Room Air Temperature."

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

/RA/

Jason J. Drake, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosures:

1. Amendment No. 274 to NPF-38
2. Safety Evaluation

cc: Listserv



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

ENERGY OPERATIONS, INC.

DOCKET NO. 50-382

WATERFORD STEAM ELECTRIC STATION, UNIT 3

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 274
Renewed License No. NPF-38

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Operations, Inc. (EOI), dated October 16, 2024, as supplemented by letter dated April 15, 2025, 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.

2. 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 Renewed 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. 274, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. EOI 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 and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Tony Nakanishi, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to Renewed Facility
Operating License No. NPF-38 and
the Technical Specifications

Date of Issuance: July 25, 2025

ATTACHMENT TO LICENSE AMENDMENT NO. 274
TO RENEWED FACILITY OPERATING LICENSE NO. NPF-38
WATERFORD STEAM ELECTRIC STATION, UNIT 3
DOCKET NO. 50-382

Replace the following pages of Renewed Facility Operating License No. NPF-38 and the Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License

REMOVE

-4-

INSERT

-4-

Technical Specifications

REMOVE

3/4 7-18a

3/4 7-18b

INSERT

3/4 7-18a

3/4 7-18b

the NRC of any action by equity investors or successors in interest to Entergy Louisiana, LLC that may have an effect on the operation of the facility.

- C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

1. Maximum Power Level

EOI is authorized to operate the facility at reactor core power levels not in excess of 3716 megawatts thermal (100% power) in accordance with the conditions specified herein.

2. Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 274, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. EOI shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. Antitrust Conditions

- (a) Entergy Louisiana, LLC shall comply with the antitrust license conditions in Appendix C to this renewed license.
- (b) Entergy Louisiana, LLC is responsible and accountable for the actions of its agents to the extent said agent's actions contravene the antitrust license conditions in Appendix C to this renewed license.

PLANT SYSTEMS

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, 4, 5, and 6, and during load movements with or over irradiated fuel assemblies.

ACTION:

- a. With one control room air conditioning unit inoperable, restore the inoperable unit to OPERABLE status within 30 days.
- b. With two control room air conditioning units inoperable in MODE 1, 2, 3, or 4, return at least one unit to an OPERABLE status within 24 hours*.
- c. With ACTION a and/or b not met in MODE 1, 2, 3, or 4, be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. With ACTION a not met in MODE 5 or 6, or with ACTION a not met during load movements with or over irradiated fuel assemblies:
 1. Immediately place OPERABLE control room air conditioning unit in operation, or
 2. Immediately suspend all operations involving CORE ALTERATIONS and load movements with or over irradiated fuel assemblies.
- e. With two control room air conditioning units inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies, or with the OPERABLE control room air conditioning unit, required to be in operation by ACTION d.1, not capable of being powered by an OPERABLE emergency power source, immediately suspend all operations involving CORE ALTERATIONS and load movements with or over irradiated fuel assemblies.

SURVEILLANCE REQUIREMENTS

4.7.6.3 Each control room air conditioning unit shall be demonstrated OPERABLE:

- a. In accordance with the Surveillance Frequency Control Program 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.

*ACTION b is not applicable when the second control room air conditioning unit is intentionally made inoperable.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 274

TO RENEWED 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, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24290A141), as supplemented by letter dated April 15, 2025 (ML25105A228), Entergy Operations, Inc. (Entergy, the licensee) requested changes to the technical specifications (TSs) for the Waterford Steam Electric Station, Unit 3 (Waterford 3 or WF3).

The proposed changes would revise current TS 3.7.6.3, "Control Room Air Temperature – Operating" and TS 3.7.6.4, "Control Room Air Temperature – Shutdown," by extending the completion time (CT) for one inoperable control room air conditioning unit from 7 days to 30 days, and the CT when both control room air conditioning units are inoperable from 1 hour to 24 hours. Additionally, the current Waterford 3 TSs separate control room air conditioning unit requirements into separate mode dependent specifications (operating and shutdown). This request combines current TSs 3.7.6.3 and 3.7.6.4 into a single technical specification (i.e., proposed TS 3.7.6.3 "Control Room Air Temperature").

The supplement dated April 15, 2025, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the U.S. Nuclear Regulatory Commission (NRC, the Commission) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* (FR) on February 18, 2025 (90 FR 9742).

2.0 REGULATORY EVALUATION

2.1 System Description

In section 2.1, "System Design and Operation," of the enclosure to the license amendment request (LAR), the licensee stated::

The WF3 Control Room Air Conditioning System (CRACS) provides temperature control for the control room during normal operations and following isolation of the control room. CRACS consists of two full capacity safety related redundant air conditioning units. The redundant air conditioning units are served by redundant safety related loops of the Essential Services Chilled Water System (ESCWS) such that loss of one loop of the ESCWS does not affect ability of the CRACS to control the thermal environment in the control room envelope. The redundant equipment essential for the safety functions are powered from vital electrical Divisions A and B of the Plant Electric Power Distribution System such that loss of one division does not prevent the CRACS from fulfilling its safety function.

2.2 Requested Changes

As described in section 2.4, "Description of the Proposed Change," of the enclosure to the LAR supplement dated April 15, 2025, the licensee requested changes to TS 3.7.6.3, "Control Room Air Temperature – Operating," and TS 3.7.6.4, "Control Room Air Temperature – Shutdown," as stated below:

- ...when one control room air conditioning unit is inoperable in any of the current required modes or conditions for operability, the AOT [allowed outage time] to restore the unit to an operable status is extended from 7 days to 30 days.
- With both units inoperable in Modes 1, 2, 3, or 4, the AOT to restore at least one unit to an operable status is extended from 1 hour to 24 hours. This requirement is modified by a Note * which prohibits use of the 24-hour allowance if the second control room air conditioning unit is intentionally made inoperable, consistent with the ISTS [improved standard technical specifications].

The licensee further states in the enclosure to the LAR that,

The WF3 control room air conditioning requirements are contained in two separate specifications: 1) a specification governing operation in Modes 1, 2, 3, and 4 (TS 3.7.6.3) and, 2) a specification governing operation in Modes 5 and 6, and during load movements with or over irradiated fuel assemblies (TS 3.7.6.4). Both specifications require two control room air conditioning units to be operable and are being combined into a single specification, consistent with the ISTS....

In order to support the combining of the two mode/condition dependent specifications into one and to reduce redundancy in wording, Actions are proposed to be rearranged or added as needed, maintaining the current requirements except for the proposed CT changes previously described above in

this section. The changes proposed to combine TS 3.7.6.3 and 3.7.6.4 are listed below:

- The shutdown statements of TS 3.7.6.3, Actions a and b, will be relocated to a new Action c to reduce redundancy.
- The Limiting Condition for Operation (LCO) statement and Applicability of TS 3.7.6.4 will be included in the LCO statement and Applicability of TS 3.7.6.3.
- The restoration period of TS 3.7.6.4, Action a, will now be contained in Action a of TS 3.7.6.3.
- The TS 3.7.6.4, Action a, requirement to place the remaining operable control room air conditioning unit in service is relocated as TS 3.7.6.3, Action d.1.
- New Action d.2 is added to TS 3.7.6.3 to address not meeting the TS 3.7.6.4, Action a, requirement to place the operable control room air conditioning unit in operation. Consistent with TS 3.7.6.4, Action b, new TS 3.7.6.3, Action d.2, requires the suspension of all operations involving core alterations and load movements with or over irradiated fuel assemblies, when TS 3.7.6.4, Action a, is not met.
- With respect to the suspension of all operations involving core alterations and load movements with or over irradiated fuel assemblies, a time of “immediately” is added to TS 3.7.6.3, Actions d.2 and e, for clarity.
- With TS 3.7.6.3 “Control Room Air Temperature – Operating” and TS 3.7.6.4 “Control Room Air Temperature – Shutdown” being combined, the title of TS 3.7.6.3 is changed to “Control Room Air Temperature.”

2.3 Regulations and Guidance

Under Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.90, “Application for amendment of license, construction permit, or early site permit,” whenever a holder of a license wishes to amend the license, including TSs in the license, an application for amendment must be filed, fully describing the changes desired. Under 10 CFR 50.92(a), determinations on whether to grant an applied-for license amendment are to be guided by the considerations that govern the issuance of initial licenses to the extent applicable and appropriate. Both the common standards for licenses in 10 CFR 50.40(a), and those specifically for issuance of operating licenses in 10 CFR 50.57(a)(3), provide that there must be reasonable assurance that the activities at issue will not endanger the health and safety of the public, and that the applicant will comply with the Commission’s regulations.

The Commission’s regulatory requirements related to the content of TSs are set forth in 10 CFR 50.36, “Technical specifications,” which require, in pertinent part, that the TSs include: (1) safety limits, limiting safety system settings, and limiting control settings; (2) LCOs; (3) surveillance requirements; (4) design features; and (5) administrative controls.

The regulation under 10 CFR 50.36(a)(1) states, that

Each applicant for a license authorizing operation of a . . . utilization facility shall include in his application proposed technical specifications in accordance with the requirements of this section. A summary statement of the bases or reasons for such specifications . . . shall also be included in the application, but shall not become part of the technical specifications.

The regulations under 10 CFR 50.36(b), state, in part that,

Each license authorizing operation of a production or utilization facility. . . will include technical specifications. The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto....

The regulation under 10 CFR 50.36(c)(2), states, in part that, the technical specifications will include LCOs, which are the lowest functional capability or performance level of equipment required for safe operation of the facility. When LCOs are not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TSs until the LCOs can be met.

Regulatory Guide (RG) 1.174, Revision 3, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," January 2018 (ML17317A256), describes a risk-informed approach acceptable to the NRC for assessing the nature and impact of proposed permanent licensing-basis changes by considering engineering issues and applying risk insights. This RG also provides risk-acceptance guidelines for evaluating the results of such evaluations.

The Summary section of the Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors published in the *Federal Register* on July 22, 1993 (58 FR 39132), states, in part:

Implementation of the Policy Statement through implementation of the improved STS [Standard Technical Specifications] is expected to produce an improvement in the safety of nuclear power plants through the use of more operator-oriented Technical Specifications, improved Technical Specification Bases, reduced action statement induced plant transients, and more efficient use of NRC and industry resources.

Section IV, "The Commission Policy," of the Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (58 FR 39136, July 22, 1993) states, in part:

The purpose of Technical Specifications is to impose those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety by identifying those features that are of controlling importance to safety and establishing on them certain conditions of operation which cannot be changed without prior Commission approval.

...[T]he Commission will also entertain requests to adopt portions of the improved STS [(NUREG-1432, Revision 5 "Standard Technical Specifications, Combustion Engineering Plants," "Volume 1, "Specifications" (ML21258A421))]

even if the licensee does not adopt all STS improvements. ...The Commission encourages all licensees who submit Technical Specification related submittals based on this Policy Statement to emphasize human factors principles.

...In accordance with this Policy Statement, improved STS have been developed and will be maintained for each NSSS [nuclear steam supply system] owners' group. The Commission encourages licensees to use the improved STS as the basis for plant-specific Technical Specifications. ...[I]t is the Commission intent that the wording and Bases of the improved STS be used ... to the extent practicable.

The NRC staff's guidance for the review of TSs is in NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition" (SRP), Chapter 16.0, "Technical Specifications," Revision 3, dated March 2010 (ML100351425). As described therein, as part of the regulatory standardization effort, the NRC staff has prepared STSs for each of the LWR nuclear designs. Waterford 3 is a Combustion Engineering (CE) design reactor, and the corresponding STSs are in NUREG-1432. Although Waterford 3 has not adopted STSs, the STSs are still applicable. Accordingly, the NRC staff's review includes consideration of whether the proposed changes are consistent with NUREG-1432, as modified by NRC approved-travelers.

3.0 TECHNICAL EVALUATION

The NRC staff evaluated the licensee's application to determine whether the proposed changes are consistent with the regulations, guidance, and plant-specific design and licensing basis information discussed in section 2.3 of this safety evaluation (SE).

The NRC staff reviewed the acceptability of the proposed changes to the TSs by evaluating whether the proposed changes continue to provide reasonable assurance of public health and safety. The NRC staff also verified that the proposed changes to the TSs provide reasonable assurance that the temperature limits of main control room equipment are maintained, and that control room habitability is maintained.

3.1 NRC Staff Evaluation

3.1.1 Evaluation of Proposed CT for One Control Room Air Conditioning Unit Inoperable

The CT is proposed to be extended from 7 days to 30 days to restore the unit to an operable status with one control room air conditioning unit inoperable in any of the current required modes or conditions for operability.

The purpose of restoring an inoperable control room air conditioning unit to operable status within a specified time period (current Action a of TSs 3.7.6.3 and 3.7.6.4) is to assure redundancy in the case of a single failure of one train. The proposed CT extension from 7 days to 30 days is acceptable because the operable air conditioning unit can still perform the specified safety function and the low probability of a design basis accident occurring while in this condition while providing a reasonable time for repairs or replacement. The licensee also noted that that plant procedures can establish temporary alternate means of control room cooling. The control room air conditioning unit is still required to be restored to an operable status and the CRACS specified safety function can be met without the redundant air conditioning unit.

The NRC staff finds that the proposed 30-day CT is reasonable, based on the low probability of an event occurring requiring control room isolation, considering that the remaining train can provide the required capabilities, and the alternate safety or non-safety related cooling means that are available. The staff also notes that this change is consistent with NUREG 1432.

3.1.1.1 Evaluation of Proposed CT For Two Control Room Air Conditioning Units Inoperable

Technical Specifications Task Force (TSTF) Traveler TSTF-426, "Revise or Add Actions to Preclude Entry into LCO 3.0.3 – RITSTF [Risk-Informed TSTF] Initiatives 6b & 6c," dated November 2011 (ML113260461), incorporated the approved Pressurized Water Reactor Owner's Group (PWROG) Topical Report (TR) WCAP-16125-NP-A, "Justification for Risk-Informed Modifications to Selected Technical Specifications for Conditions Leading to Exigent Plant Shutdown," August 2010 (Package ML110070498), into NUREG-1432. The acceptability of this AOT extension contained in TSTF-426 was based on WCAP-16125-NP-A, which demonstrated that the 24-hour AOT is acceptable based on the infrequent use of the ACTION and the small incremental effect on plant risk.

In the NRC SE of the PWROG TR WCAP-16125-NP, (ML093350670), the NRC staff evaluated TR WCAP-16125 for conformance with the five key principles of RG 1.174. The five key principles include (1) Compliance with current regulations, (2) defense-in-depth, (3) safety margins, 4) performance monitoring, and 5) risk assessment. The conclusions documented in the NRC SE for TR WCAP-16125-NP related to compliance with the five key principles are applicable to Waterford 3.

The licensee proposed revising the CT for Required Action b. for two control room air conditioning units inoperable from 1 hour to 24 hours, consistent with TSTF-426 and WCAP-16125-NP-A. The proposed change also includes the following note, "ACTION b is not applicable when the second control room air conditioning unit is intentionally made inoperable."

The control room air conditioning units provide for temperature control of the control room when it is isolated during accident conditions. This provides assurance that the control room temperature will not exceed equipment operability requirements.

The current Waterford 3 TS 3.7.6.3.b requires the plant to shut down when both control room air conditioning units are inoperable, and one train cannot be restored within 1 hour. The proposed change would provide a 24-hour CT to restore at least one control room air conditioning unit to operable status, to permit continued operation under an existing action requirement.

TR WCAP-16125 stated that the unavailability of the control room ventilation (CRV) cooling (equivalent to control room air conditioning units at Waterford 3) has a negligible impact on severe accident risk, based on long room heatup times, availability of alternate cooling strategies, and alternate means to control emergency systems locally. The NRC staff reviewed the basis for this conclusion and considered the potential plant impacts if an accident occurred, which isolated the control room while the control room air conditioning units are inoperable.

If an accident occurred which isolated the control room without cooling, and core cooling was being maintained by the emergency core cooling system, then there would be negligible radiological consequences, and the operators could simply unisolate and realign the normal CRV system to provide continued cooling of the control room. Therefore, there would be no impact on core damage frequency (CDF) (i.e., $\Delta\text{CDF} = 0$).

If core damage occurred after the accident and the control room needed to remain isolated without cooling, the bounding impact would be to simply assume the event proceeded to a large early release based on the unavailability of the control room personnel to perform any mitigating actions. This assumption would be very conservative, since large releases occur primarily due to containment bypass accidents, and control room actions following core damage do not prevent the release from occurring.

A bounding estimate for CDF of CE plants was identified as $1E-4/\text{year}$, so that over a 24-hour period the probability of a significant core damage event, with the control room air conditioning units unavailable, is assumed to proceed to a large early release, which would be:

$$(1E-4/\text{year}) \times (24 \text{ hours}) \times (\text{year}/8760 \text{ hours}) = 2.7E-7$$

Assuming a once per 3-year entry into the new TS, and assuming the entire 24-hour duration of the CT is used, the conservatively calculated large early release frequency (LERF) (i.e., ΔLERF) is about $9.0E-8/\text{year}$. This ΔLERF , and the zero ΔCDF , are below the acceptance guidelines of RG 1.174.

Defense-in-depth is provided by alternative control room cooling actions and by the capability for local operation of equipment, if necessary. These actions are typically found in plant procedures and are not required to be implemented by TS controls. The licensee confirmed in the LAR that plant procedures can establish temporary alternate means of control room cooling.

The current Waterford 3 TS 3.7.6.3.b applies when two control room air conditioning units are inoperable in Mode 1, 2, 3, or 4 and requires the plant to shut down if one train cannot be restored within 1 hour. TR WCAP-16125 justifies a 24-hour CT for two control room air conditioning units inoperable. TS 3.7.6.3.b is revised to require restoration of at least one control room air conditioning units to operable status within 24 hours.

The NRC SE for TR WCAP-16125 states that, "...appropriate TS notes are provided which assure that the loss of safety function action requirements are not applicable for operational convenience and that voluntary entry into these action requirements in lieu of other alternatives that would not result in redundant systems or components being inoperable are prohibited." TS 3.7.6.3.b is proposed to be modified by a note stating, "ACTION b is not applicable when the second control room air conditioning unit is intentionally made inoperable." The inclusion of this note assures that this loss of safety function action requirement is not applicable for operational convenience and is therefore acceptable.

Based on the risk result being below the acceptance guidelines of RG 1.174, the NRC staff finds the proposed new action requirement and 24-hour CT acceptable. The staff also notes that this change is consistent with NUREG 1432.

3.1.1.2 Evaluation of Proposed Deletion of Requirement for Maintaining an Emergency Power Source to an Operable Control Room Air Conditioning Unit

The licensee proposed to delete the requirement in current TS 3.7.6.3 action a, and current TS 3.7.6.4 action b "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."

The Waterford 3 Final Safety Analysis Report (FSAR) includes design bases for the control room air conditioning system in section 9.4.1.1, "Design Bases" (ML19268A130). FSAR section 9.4.1.1.c states the control room air conditioning system is designed to "permit personnel occupancy, proper functioning of instrumentation and controls, and prevent the accumulation of flammable gases during all normal and design basis accident conditions assuming a single failure coincident with a loss of offsite power." Section 15.7.3.4.1, "Identification of Causes and Frequency Classification" (ML19268A136), of the FSAR details design basis fuel handling accidents, for which the control room air conditioning system would be required assuming a loss of offsite power.

The NRC staff requested additional information from the licensee on how FSAR section 9.4.1.1.c would be met with the removal of the emergency power source requirement. In the supplement dated April 15, 2025, the license indicated that it would retain the current licensing basis requirement. The NRC staff finds the retention of this requirement is acceptable.

3.1.1.3 Evaluation of Combining TSs 3.7.6.3 and 3.7.6.4

The Waterford 3 control room air conditioning requirements are currently contained in two separate specifications. Current TS 3.7.6.3 has applicability in Modes 1, 2, 3, and 4 and current TS 3.7.6.4, has applicability in Modes 5 and 6, and during load movements with or over irradiated fuel assemblies. The LCO for both specifications require two independent control room air conditioning units to be operable. The two Waterford 3 control room air temperature specifications, TS 3.7.6.3 and TS 3.7.6.4 are proposed to be combined into a single specification (i.e., proposed TS 3.7.6.3), consistent with NUREG-1432, Revision 5. To facilitate combining the specifications into one, Actions are proposed to be rearranged and renumbered, maintaining the current requirements except for the proposed changes evaluated above in this section.

The NRC staff has reviewed the changes necessary to combine these TS sections and determined that these changes maintain current TS requirements, are administrative in nature and, therefore, are acceptable. The staff also notes that these changes are consistent with NUREG 1432.

3.4 Technical Conclusion

Based on its evaluation above, the NRC staff determined that the regulatory requirements of 10 CFR 50.36(c)(2) will continue to be met because the modified TS will continue to describe the lowest functional capability or performance level of equipment required for safe operation of the facility and the remedial actions permitted by the TSs until the LCO can be met. Therefore, the NRC staff finds that the proposed changes to TS 3.7.6.3 and TS 3.7.6.4, specifically, proposed extension of CTs for the conditions when 1 or 2 control room air conditioning units are inoperable are acceptable because proposed TS 3.7.6.3, as revised, will continue to meet the requirements in 10 CFR 50.36(c)(2).

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Louisiana State official was notified of the proposed issuance of the amendment on June 17, 2025. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration published in the *Federal Register* on February 18, 2025 (90 FR 9739), and there has been no public comment on such findings. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). 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.

6.0 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) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: J. Wilson, NRR
J. Robinson, NRR
B. Rothberg, NRR
D. Nold, NRR

Date: July 25, 2025

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - ISSUANCE OF AMENDMENT NO. 274 RE: EXTENSION OF ALLOWABLE OUTAGE TIMES FOR ONE OR MORE CONTROL ROOM AIR CONDITIONING UNITS INOPERABLE (EPID L-2024-LLA-0151) DATED JULY 25, 2025

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NRR-058

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NAME	JDrake	WOrders	PBlechman
DATE	6/17/2025	6/23/2025	6/24/2025
OFFICE	NRR/DSS/STSB/BC	NRR/DRA/APLB/BC	NRR/DSS/SCP/BC
NAME	SMehta	EDavidson	MValentin
DATE	6/30/2025	6/27/2025	6/25/2025
OFFICE	NRR/DORL/LPL4/BC	NRR/DORL/LPL4/PM	
NAME	TNakanishi	JDrake	
DATE	7/25/2025	7/25/2025	

OFFICIAL RECORD COPY