

February 26, 2002

Mr. Joseph E. Venable
Vice President Operations
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - ISSUANCE OF
AMENDMENT RE: EMERGENCY DIESEL GENERATOR (EDG)
SURVEILLANCE REQUIREMENTS (TAC NO. MB2371)

Dear Mr. Venable:

The Commission has issued the enclosed Amendment No. 180 to Facility Operating License No. NPF-38 for the Waterford Steam Electric Station, Unit 3. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated July 10, 2001, as supplemented by letter dated December 20, 2001.

The amendment modifies surveillance requirement (SR) 4.8.1.1.2.e to allow performance of specific SRs (4.8.1.1.2.e.1, 2, 4, 6, 10, and 12) during any mode of plant operation. Your December 20, 2001, supplemental letter retracted SR 4.8.1.1.2.e.9 from the scope of the original request made in your July 10, 2001, letter. The allowance to perform these SRs when the plant is operating will provide flexibility in the scheduling of testing activities consistent with online maintenance activities and improve emergency diesel generator availability during plant shutdown periods.

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

Sincerely,

/RA/

N. Kalyanam, Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosures: 1. Amendment No. 180 to NPF-38
2. Safety Evaluation

cc w/encls: See next page

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ENTERGY OPERATIONS, INC.

DOCKET NO. 50-382

WATERFORD STEAM ELECTRIC STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 180
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 July 10, 2001, as supplemented by letter dated December 20, 2001, 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 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. 180, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the 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 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Robert A. Gramm, Chief, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: February 26, 2002

ATTACHMENT TO LICENSE AMENDMENT NO. 180

TO FACILITY OPERATING LICENSE NO. NPF-38

DOCKET NO. 50-382

Replace the following pages of 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.

Remove

3/4 8-4
3/4 8-5
3/4 8-6
3/4 8-6a

Insert

3/4 8-4
3/4 8-5
3/4 8-6
3/4 8-6a

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 180 TO

FACILITY OPERATING LICENSE NO. NPF-38

ENTERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION

By letter dated July 10, 2001, as supplemented by letter dated December 20, 2001, Entergy Operations, Inc. (Entergy, the licensee) submitted a request for changes to the Waterford Steam Electric Station, Unit 3, (Waterford 3) Technical Specifications (TSs). The proposed changes relate to Emergency Diesel Generator (EDG) surveillance testing and modify Surveillance Requirement (SR) 4.8.1.1.2.e regarding the testing of EDGs during any mode of plant operation. The purpose of the proposed change is to provide Entergy additional flexibility in the scheduling of maintenance activities, reduce plant refueling outage duration, and increase EDG availability when the plant is shut down. Currently, as directed by SR 4.8.1.1.2.e, SRs 4.8.1.1.2.e.1 through 4.8.1.1.2.e.12 are required to be performed at least once per 18 months during shutdown. The proposed change would permit SRs 4.8.1.1.2.e.1, 4.8.1.1.2.e.2, 4.8.1.1.2.e.4, 4.8.1.1.2.e.6, 4.8.1.1.2.e.10, and 4.8.1.1.2.e.12 to be performed during any mode of plant operation. SRs 4.8.1.1.2.e.3, 4.8.1.1.2.e.5, 4.8.1.1.2.e.7, 4.8.1.1.2.e.8, and 4.8.1.1.2.e.11 will be performed only when the plant is shutdown. This is achieved by deleting the words "during shutdown" from 4.8.1.1.2.e and adding them to the specific SRs 4.8.1.1.2.e.1, 4.8.1.1.2.e.2, 4.8.1.1.2.e.4, 4.8.1.1.2.e.6, 4.8.1.1.2.e.10, and 4.8.1.1.2.e.12. The change to SR 4.8.1.1.2.c.1.a is editorial in nature.

This amendment is based on a similar evaluation and approval for Niagra Mohawk Power Corporation for Nine Mile Point Nuclear Station, Unit 2, dated March 7, 1995. Also, similar changes for testing of the EDG lockout features (SR 4.8.1.1.2.e.12) have been reviewed and approved by the Nuclear Regulatory Commission (NRC) for Millstone Nuclear Power Station, Unit 3 and Catawba Nuclear Stations, Units 1 and 2.

The December 20, 2001, supplemental letter provided additional information that did not change the scope of the request or the initial proposed no significant hazard consideration determination (66 FR 44168, published August 22, 2001).

2.0 BACKGROUND

General Design Criterion (GDC)-17, "Electric Power Systems," of Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50 requires, in part, that nuclear power

plants have an onsite and offsite electric power system to permit the functioning of structures, systems and components important to safety. The onsite system is required to have sufficient independence, redundancy, and testability to perform its safety function, assuming a single failure. Also, the offsite power is required to be supplied by two independent circuits. In addition, this criteria requires provisions to minimize the probability of losing electric power from the remaining electric power supplies as the result of a loss of power from the unit, the offsite transmission network, or the onsite power supplies. GDC-18, "Inspection and Testing of Electric Power Systems," requires that electric power systems important to safety be designed to permit appropriate periodic inspection and testing.

As described by the licensee's July 10, 2001, application, offsite power to Waterford 3 is supplied from the main generator to the Waterford 3 switching station through two main transformers, which are in parallel. From the switching station, two overhead lines transmit power to the Waterford 3 switchyard, which is the point of connection to the grid. The plant electric power distribution system receives power under normal operating conditions from the main generator through two unit auxiliary transformers. For startup and shutdown, when the main generator is unavailable, power is obtained through two startup transformers from the grid through the switchyard transmission lines and the switching station. When Waterford 3 is not operating, an additional supply path from the switching station to the plant electric power distribution system may be made available by opening links in the generator main leads and by using the main transformers and unit auxiliary transformers instead of the startup transformers.

The onsite power system includes three 4.16 kV Engineered Safety Feature (ESF) buses. Power for safety related loads is normally supplied by the non-safety related 4.16 kilo Volts (kV) buses of the offsite power system. Should offsite power from either of these buses be lost, the onsite power system will receive power automatically from the appropriate EDG. Each ESF bus is redundant to the other; each can supply sufficient power to its safety related loads to enable safe shutdown, or to mitigate the consequences of a design basis accident. The third bus may be connected to either of the other buses, but never to both. Therefore, the third bus is not considered as a third, separate source of power. This bus serves only to supply power to safety related loads, which are standby to safety loads on the two primary ESF buses.

There are two EDGs, one for each ESF train, at Waterford 3. The EDG ratings are sufficient to supply reliable power to both safety-related and some non-safety related loads in its respective train. The controls for each EDG are designed for both automatic and manual operation. During normal plant operations, the EDGs are in standby condition and start automatically if there is a loss of power on their respective emergency bus or upon receipt of a Safety Injection Actuation System (SIAS). The EDGs are rated at 4400 kilo Watts (kW) continuous with a supplementary rating of 4840 kW for two hours in any 24-hour period.

3.0 EVALUATION

The licensee proposed the following changes to Waterford 3 TS, which would allow certain EDG SRs to be performed when the plant is operating instead of during shutdown, as currently required. The licensee states that performing these SRs while the plant is operating would provide additional flexibility in the scheduling of maintenance activities, reduce plant refueling outage duration, and increase EDG availability when the plant is shut down.

3.1 SR 4.8.1.1.2.c.1.a

This SR currently states: "A water and sediment content of less or equal to 0.05 volume percent." The licensee has proposed to add "than" after "less" in this SR. The staff finds the proposed change to be editorial and acceptable.

3.2 SR 4.8.1.1.2.h.1

The licensee has proposed to delete the word "and" at the end of the SR, "Draining each diesel generator fuel oil storage tank, removing the accumulated sediment, and cleaning the tank using a sodium hypochlorite solution or equivalent, and." However, the NRC copy of the TS, as well as the markups of the TS page sent by the licensee with the application and the supplement do not have this word "and." Therefore, the staff finds the proposed change, which is editorial in nature would have been acceptable in any case, is unnecessary since the SR is editorially correct now.

3.3 SR 4.8.1.1.2.e

This SR currently requires performance of several SRs "during shutdown." The licensee has proposed a change to SR 4.8.1.1.2.e, to remove the phrase "during shutdown" affecting SRs 4.8.1.1.2.e.1, 4.8.1.1.2.e.2, 4.8.1.1.2.e.4, 4.8.1.1.2.e.6, 4.8.1.1.2.e.10, and 4.8.1.1.2.e.12 (discussed below), which would allow performance of these SRs during modes other than shutdown. Therefore, the licensee has proposed to include the phrase "during shutdown" only in those specific SRs (4.8.1.1.2.e.3, 4.8.1.1.2.e.5, 4.8.1.1.2.e.7, 4.8.1.1.2.e.8, 4.8.1.1.2.e.9, and 4.8.1.1.2.e.11) still requiring performance during shutdown. The staff finds the proposed change to be administrative and acceptable.

3.4 SR 4.8.1.1.2.e.1

SR 4.8.1.1.2.e.1 currently requires, at least once per 18 months during shutdown, verification of the EDG's capability to reject a load of greater than or equal to 498 kW while maintaining voltage at 4160 +420, -240 volts (V) and frequency at 60 +4.5, -1.2 Hertz (Hz). The licensee has proposed to perform this SR during power operation rather than shutdown. The licensee states that the full load rejection test results envelop the ability of the EDG to reject a load greater than or equal to 498 kW. The staff agrees that since rejecting a full load does not cause significant perturbation to the electrical distribution systems, the rejection of a load greater than or equal to 498 kW which is well below the full load rating of the EDG will not cause any perturbation to the electrical distribution system. Therefore, the proposed change is acceptable.

3.5 SR 4.8.1.1.2.e.2

SR 4.8.1.1.2.e.2 currently requires, at least once per 18 months during shutdown, verification of the EDG's capability to reject a load of an indicated 4000-4400 kW without tripping. The EDG voltage shall not exceed 5023 V during and following the load rejection. The reason for the mode restriction is to prevent unnecessary perturbation to the electrical distribution systems which could challenge steady state operation if the reactor is in Mode 1 or 2. The licensee has proposed to perform this surveillance during power operation rather than shutdown.

During the test, the EDG operates in parallel with offsite power and is loaded to its continuous rating. To create load rejection, the EDG output breaker is manually opened. This results in EDG rejecting its load and isolating it from the 4160 V vital bus. The load is simultaneously picked up by the offsite power source. The licensee states that the previous full-load test data indicates that voltage on the 4160 V safety buses was within $\pm 5\%$ of the initial test voltage and stabilized within one second. This relatively minor transient was well within the capability of the loads on the vital buses. The $+ 5\%$ value properly ensures stability of the safety bus and is within the design rating of the switchgear (4760 V). The $- 5\%$ falls above the instantaneous Loss of Voltage TS trip set point of greater than or equal to 3245 V. It is also above the degraded voltage values of ≤ 3675 V with inverse time characteristic of a high of 9 seconds to a low of 2 seconds time delay and sustained degraded voltage values of ≤ 3875 with a time delay of 12.5 seconds. The licensee states that the instantaneous loss of voltage trip was used for a tolerance value based on the Refueling Outage 9 EDG 100% load rejection test data that resulted in a voltage drop of approximately 2% with stabilizing in about 0.5 seconds.

Based on the previous test results, the staff concludes that since performance of this SR in the past did not cause significant perturbation to the electrical distribution system, the performance of this SR during power operation is acceptable.

3.6 SR 4.8.1.1.2.e.4

This SR requires, at least once per 18 months during shutdown, verification that on an SIAS, the EDG starts on the auto-start signal and operates on standby for greater than or equal to 5 minutes. The steady-state EDG voltage and frequency shall be 4160 +420, - 240 V and 60 +/- 1.2 Hz within 10 seconds after the auto-start signal, the EDG voltage and frequency shall be maintained within these limits during the test. The licensee has proposed to perform this test during power operation. The licensee states that the design of their ESF subgroup relays offers Waterford 3 the ability to start the EDG with the SIAS actuation test signal during power operation without causing any loads to shed or ESF loads to start. Based on the above, the staff concludes that since the SIAS to the EDG can be generated without causing any loads to shed or ESF loads to start, the performance of this SR during power operation is acceptable.

3.7 SR 4.8.1.1.2.e.6

This SR requires at least once per 18 months during shutdown, verification that the EDG operates for at least 24 hours. During the first 2 hours of this test, the EDG shall be loaded to greater than or equal to 4700 kW to 4900 kW and during the remaining 22 hours of this test, the EDG shall be loaded to 4000 kW to 4400 kW. The EDG voltage and frequency shall be 4160 +420, -240 V and 60 +/-1.2 Hz within 10 seconds after the start signal, and the steady state EDG voltage and frequency shall be 4160 +/- 420 V and 60 +1.2, -3 Hz during the test. Within 5 minutes after completing this 24 hour test, SR 4.8.1.1.2.a.4 is performed. This test is presently performed only during shutdown. The reason for the mode restriction is to prevent unnecessary perturbation to the electrical distribution systems, which could challenge steady state operation if the reactor is in Mode 1 or 2. The licensee has proposed to perform this surveillance during power operation.

The licensee states that each month the EDGs are run during power operation to satisfy monthly TS requirements. The EDG system lineup with the offsite power for the monthly test is the same as the lineup for the 24-hour endurance run. Therefore, performing the 24-hour

endurance test at power does not introduce a new mode of operation. The EDG remains operable while paralleled to the electrical grid. Only one EDG is paralleled to the offsite source at any one time. Thus, the testing does not affect the independent safe shutdown capabilities of the remaining EDGs or the emergency buses.

In the event of an emergency, while an EDG is operating in the test mode and offsite power available, the SIAS automatically opens the EDG output breaker and overrides the test mode, returning the EDG to standby operation (running but not connected to the bus). This function is tested once every 18 months in accordance with SR 4.8.1.1.2.e.9. If a Loss Of Offsite Power (LOOP) occurs following the SIAS, the bus under-voltage relays will cause load shedding and allow the EDG output breaker to automatically close, and the EDG will pick up the emergency loads with load sequencing as designed. Thus, the EDG operating in the test mode will be available to perform its intended safety function. Also, Waterford 3 has additional procedural requirements that prohibit the testing of both EDGs simultaneously except when satisfying TS SR 4.8.1.1.2.g.

In the event of a LOOP, with the EDG operating in the test mode, the EDG trip is generated by overcurrent with voltage restraint 51-V relays. The 51-V relays initiate a EDG trip when the voltage is $\leq 80\%$ and generator current is ≥ 800 amperes (amps). When a low voltage condition occurs (due to overloading) in a range from > 80 to 93.1% , a Loss of Voltage Signal (LOVS) will trip open the EDG output breaker (the undervoltage signal is generated by LOVS 27 relays). The EDG will continue to run and will re-close on the bus in 5 seconds. When the low voltage occurs in a range from 80% to a complete loss of power, a relay race between 51-V relays and the 27 relays may occur. If the under-voltage is of sufficient magnitude to cause the generator amps to be ≥ 800 , the overcurrent with voltage restrained relays will actuate. The 51-V relays will actuate the lockout relay, tripping the EDG and opening the output breaker. After the EDG trips, a LOVS will occur. The undervoltage relays will then actuate, open the offsite power feeder breaker, shift the EDG controls to emergency mode (bypassing the lockout relay), start the EDG, and reconnect the EDG to the bus within 10 seconds. Thus, the EDG will remain available throughout the 24-hour endurance test to perform its intended function.

The licensee has also performed a bounding assessment of the risk associated with performing 24-hour endurance tests on-line, assuming the EDG was inoperable throughout the test. The resulting increase in core damage frequency was $9\text{E-}8$ per year, which is a small risk according to the guidance in Regulatory Guide (RG)1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," which is less than $1\text{E-}6$. The increase in Large Early Release Frequency for the proposed 24 hour tests is in the $\text{E-}9$ range, which is also a small risk by RG 1.174 (less than $1\text{E-}7$ per year). The licensee states that these risk values are conservative because they include the assumption that the EDG is totally unavailable during the test, when in fact, the EDG will be operable.

Additionally, the EDG 24-hour test will not be performed if severe weather or unstable grid conditions are predicted to occur during the 24-hour test.

Based on the above, we conclude that the performance of this test during power operation is acceptable due to the following provisions: 1) the EDGs are equipped with a design feature that allows the EDG to automatically switch from the test mode to the standby mode on the receipt of an accident signal as well as LOOP signal, 2) during the 24-hour test of an EDG, no other

EDG is operated in parallel with the offsite power grid, and 3) the EDGs will not be paralleled to the offsite power systems during severe weather or unstable grid conditions, unless an emergency condition warranted its use.

3.8 SR 4.8.1.1.2.e.10

This SR requires at least once per 18 months during shutdown, verification that each fuel transfer pump transfers fuel to its associated diesel oil feed tank by taking suction from the opposite train fuel oil storage tank via the installed cross connect. The licensee has proposed to perform this test during power operation rather than during shutdown.

This test is performed by aligning the "A" fuel transfer pump suction to the "B" fuel oil storage tank, or the "B" fuel transfer pump suction to the "A" fuel oil storage tank. Only one train is tested at a time, and that train is considered inoperable during the test. The train that is being tested is considered inoperable. The test alignment requires the normal fuel transfer suction valve to be closed and two cross-connect valves to the opposite train to be opened. When an increase in volume is observed in the associated train's Diesel Oil Fuel Tank, the transfer pump is secured and valves realigned. The licensee states that this test can be performed in less than 2 hours. The staff concludes that, since this test can be accomplished in a short time without posing any threat to the safety of the plant, the proposed change is acceptable.

3.9 SR 4.8.1.1.2.e.12

This SR requires at least once per 18 months during shutdown, verifying that the following EDG lockout features prevent EDG starting only when required.

- a) turning gear engaged
- b) emergency stop
- c) loss of D.C. [direct current] control power
- d) governor fuel oil linkage tripped

The licensee has proposed to perform this SR during power operation. The licensee states that the performance of this test prevents the EDG from starting and therefore, the EDG being tested is considered inoperable during the duration of the test. After each function (listed above) is tested, the normal configuration is restored before proceeding to the next function. The test can be performed in less than 2 hours, which is within the current allowed outage time.

Based on the above, the staff concludes that, since this surveillance is performed with the EDG unloaded and isolated from its respective emergency bus and can be performed in a short period of time, the performance of this test during power operation will not pose any threat to the safety of the plant. Therefore, the proposed change is acceptable.

4.0 SUMMARY

The staff concludes that the licensee has provided sufficient assurance that performing SRs 4.8.1.1.2.e.1, 2, 4, 6, 10, and 12 while at power will not create a transient that could disrupt power operation and challenge the safety systems. Further, Waterford 3 continues to meet the requirements of GDC-17 and therefore, the proposed changes are acceptable.

5.0 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.

6.0 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 and changes surveillance requirements. 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 and there has been no public comment on such finding (66 FR 4168, published August 22, 2001). The amendment relates to changes surveillance requirements and 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.

7.0 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.

Principal Contributor: M. McConnell, O. Chopra

Date: February 26, 2002

Waterford Generating Station 3

cc:

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