September 22, 2003

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: RELOCATION AND MODIFICATION OF TECHNICAL SPECIFICATIONS 4.0.5 AND 3/4.4.9 AND EXTENSION OF REACTOR COOLANT PUMP FLYWHEEL VOLUMETRIC EXAMINATION INTERVAL (TAC NO. MB8050)

Dear Mr. Venable:

The Commission has issued the enclosed Amendment No. 189 to Facility Operating License No. NPF-38 for the Waterford Steam Electric Station, Unit 3 (Waterford 3). The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated March 11, 2003.

The amendment revises and relocates Surveillance Requirement (SR) 4.0.5, "Surveillance Requirements for inservice inspection and testing of ASME [American Society of Mechanical Engineers] Code [Boiler and Pressure Vessel Code] Class 1, 2, and 3 components ... ," and SR 4.4.9, "Structural Integrity," to the administrative section of the TSs under sections 6.5.8, "Inservice Testing Program," and 6.5.7, "Reactor Coolant Pump Flywheel Inspection Program," respectively. The proposed amendment will also relocate TS 3.4.9, "Reactor Coolant System Structural Integrity" and its Bases to the Waterford 3 Technical Requirements Manual. Additionally, the proposed amendment extends volumetric examination interval of the Waterford 3 reactor coolant pump flywheel to ten years.

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. 189 to NPF-38
2. Safety Evaluation

cc w/encls: See next page

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cc w/encls: See next page **TS: ML032671171 NRR-100 PKG.: ML032661240**

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ENTERGY OPERATIONS, INC.

DOCKET NO. 50-382

WATERFORD STEAM ELECTRIC STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 189
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 March 11, 2003, 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. 189, 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: September 22, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 189

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	Insert
VI	VI
XII	XII
XVI	XVI
3/4 0-3	3/4 0-3
3/4 1-8	3/4 1-8
3/4 1-10	3/4 1-10
3/4 4-7	3/4 4-7
3/4 4-8	3/4 4-8
3/4 4-35	3/4 4-35
3/4 4-36	3/4 4-36
3/4 5-5	3/4 5-5
3/4 6-16	3/4 6-16
3/4 6-20	3/4 6-20
3/4 6-36	3/4 6-36
3/4 7-1	3/4 7-1
3/4 7-5	3/4 7-5
3/4 7-9	3/4 7-9
3/4 7-9a	3/4 7-9a
3/4 7-21	3/4 7-21
6-7	6-7
-------	6-7a

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 189 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 March 11, 2003, Entergy Operations, Inc. (Entergy or the licensee), requested changes to the Technical Specifications (TSs) for Waterford Steam Electric Station, Unit 3 (Waterford 3).

The proposed changes would revise and relocate Surveillance Requirements (SR) 4.0.5, "Surveillance Requirements for inservice inspection and testing of ASME [American Society of Mechanical Engineers] Code [Boiler and Pressure Vessel Code] Class 1, 2, and 3 components ... ," and 4.4.9, "Structural Integrity," to the administrative section of the TSs under sections 6.5.8, "Inservice Testing Program," and 6.5.7, "Reactor Coolant Pump Flywheel Inspection Program," respectively; relocate TS 3.4.9, "Reactor Coolant System Structural Integrity" and its Bases to the Waterford 3 Technical Requirements Manual (TRM). The revision and relocation of SRs 4.0.5 and 4.4.9 to the administrative section is consistent with guidance contained in NUREG-1432, Revision 2, "Standard Technical Specification, Combustion Engineering Plants," and will bring this portion of the Waterford 3 TSs into alignment with the TSs at the other southern Entergy plants. Relocation of TS 3.4.9 is also consistent with NUREG-1432 in that it does not meet the 10 CFR 50.36 criteria for being in the TSs.

With the relocation of SR 4.4.9 to the administrative section of the TSs, Entergy also proposes to extend the Waterford 3 flywheel volumetric examination interval to ten years. SR 4.4.9 requires performance of the reactor coolant pump (RCP) flywheel inspections in accordance with the recommendations of Regulatory Position C.4.b of Regulatory Guide (RG) 1.14, "Reactor Coolant Pump Flywheel Integrity," Revision 1 (August 1975). Paragraph (1) of Regulatory Position C.4.b requires an in-place ultrasonic volumetric examination of the areas of higher stress concentration at the bore and keyway at approximately three year intervals. Structural Integrity Associates, Inc. prepared Topical Report (TR) SIR-94-080-A, Revision 1, "Relaxation of Reactor Coolant Pump Flywheel Inspection Requirements," which provides the bases for the proposed change.

Specifically, the proposed changes would revise:

1.1 Deletion/Relocation of portions of TS SR 4.0.5 and related changes

1.1.1 TS SR 4.0.5a will be deleted.

1.1.2 TS SR 4.0.5b will become TS 6.5.8a and be reworded consistent with NUREG-1432, Section 5.5.8a. The proposed TS 6.5.8a will not contain the inservice inspection activities currently contained in TS SR 4.0.5b. Nine month and biennial testing frequencies will be added consistent with NUREG-1432.

1.1.3 TS SR 4.0.5c will become the new TS 6.5.8b and will be reworded like NUREG-1432, Section 5.5.8b. Inservice inspection activities currently included as part of TS SR 4.0.5c will not be contained in the proposed TS 6.5.8b.

1.1.4 TS SR 4.0.5d will be deleted.

1.1.5 TS SR 4.0.5e will become TS 6.5.8d. The wording is currently consistent with NUREG-1432, Section 5.5.8d.

1.1.6 New TS 6.5.8c will be added. It will state, "The provisions of SR 4.0.3 are applicable to inservice testing activities, and," which is consistent with NUREG-1432.

1.1.7 The following TS SRs will be modified to reflect the relocation of TS SR 4.0.5 by replacing "Specification 4.0.5" or "TS 4.0.5" with "the Inservice Testing Program."

SR 4.1.2.3	charging pumps
SR 4.1.2.5	boric acid makeup pumps
SR 4.4.2.1	safety valves shutdown
SR 4.4.2.2	safety valves operating
SR 4.4.8.3.1b	over pressure protection relief valves
SR 4.5.2f	Emergency Core Cooling System (ECCS) subsystems pumps
SR 4.6.2.1c	containment spray pumps
SR 4.6.3.3	containment isolation valves
SR 4.6.5	vacuum relief valves
SR 4.7.1.1	main steam line code safety valves
SR 4.7.1.2b	emergency feedwater pumps
SR 4.7.1.5	main steam isolation valves
SR 4.7.1.6a	main feedwater isolation valves

1.1.8 The reference to SR 4.0.5 will be deleted from SR 4.7.8 - snubber inspection program.

1.2 Relocation of TS 3/4.4.9 and Extension of Flywheel Examination Interval

1.2.1 The reference to SR 4.4.9 in the Limiting Condition for Operation for TS 3.4.9 is being removed and TS 3.4.9 and its associated Bases will be relocated to the TRM.

1.2.2 Relocating TS SR 4.4.9 to Administrative Controls under Programs as a new section 6.5.7 and revising the inspection interval to ten years.

1.3 Other Changes

1.3.1 Changing the title of TS section 6.5 to "Programs."

1.3.2 Adding a place keeper for paragraphs 6.5.1 through 6.5.6 for future changes to the administrative section of the TSs.

1.3.3 Revision of index pages VI, XII, and XVI to reflect changes made in 1.1 and 1.2 above.

1.3.4 Changes to the TS Bases to reflect the above appropriately.

2.0 REGULATORY EVALUATION

10 CFR 50.36, "Technical specifications," requires in 10 CFR 50.36(c)(3) that TSs will include surveillance requirements.

General Design Criterion 4, "Environmental and dynamic effects design bases," of Appendix A to Part 50, "General Design Criteria for Nuclear Power Plants," of Title 10 of the *Code of Federal Regulations*, requires that nuclear power plant structures, systems, and components important to safety be protected against the effects of missiles that might result from equipment failures. RG 1.14 describes a method acceptable to the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff of implementing this requirement with regard to minimizing the potential for failures of the flywheels of RCP motors in light-water-cooled power reactors, including inspection requirements such as in-place ultrasonic volumetric examination of the areas of higher stress concentrations at 3-year intervals.

3.0 TECHNICAL EVALUATION

3.1 Deletion/Relocation of portions of TS SR 4.0.5 and related changes

3.1.1 The staff agrees that SR 4.0.5a is redundant to the requirements of 10 CFR 50.55a(g) and 10 CFR 50.55a(f), which govern inservice inspection (ISI) and inservice testing (IST) requirements respectively, and such duplication could result in additional administrative burden to change duplicate TSs when these regulations are revised. The removal of duplicate requirements results in no actual change in the requirements. Therefore, this portion of the change is considered administrative and the staff finds it acceptable. SR 4.0.5a also has an additional requirement to receive specific written relief from the NRC for each proposed relief. This requirement is also deleted, and the change is consistent with NUREG-1432. This change is considered administrative in nature and the staff finds it acceptable.

3.1.2 The surveillance intervals for the ISI activities contained in SR 4.0.5b are removed for a similar reason, i.e., these requirements are redundant to those of 10 CFR 50.55a(a). Also, the removal is consistent with NUREG-1432. However, the surveillance intervals for the IST activities is moved to the new TS paragraph number 6.5.8a, again consistent with the location in NUREG-1432. In addition, two additional interval terminologies (i.e., Every 9 months and Every 2 years) have been added to the list in TS 6.5.8.a. These changes are considered administrative in nature and the staff finds them acceptable.

3.1.3 The applicability of provisions of SR 4.0.2 contained in SR 4.0.5c for performing ISI are also removed since these requirements are redundant to those of 10 CFR 50.55a(a), and for consistency with NUREG-1432. However, the applicability of provisions of SR 4.0.2, contained in SR 4.0.5c for performing the IST activities, is moved to the new TS paragraph number 6.5.8b, consistent with the location in NUREG-1432. These changes are considered administrative in nature and the staff finds them acceptable.

3.1.4 TS 4.0.5d, which states, "Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements." will be deleted. The deletion of this paragraph will not eliminate any of the SRs or ISI or IST activities, since the intent of SR 4.0.5d is conveyed by the existing statements for the individual SRs that reference TS 4.0.5, and removal of this paragraph is consistent with NUREG-1432. Further, the performance of TS SRs, in addition to ISI and IST activities are tracked and scheduled through the Waterford 3 Work Management Program. Therefore, the staff finds this change acceptable.

3.1.5 The statement in TS 4.0.5.e, which states that nothing in the Code supersedes the requirements of any TS, has been moved to TS 6.5.8.d. This change is considered administrative in nature and the staff finds it acceptable.

3.1.6 The addition of the statement in TS 6.5.8.c, which states that the provisions of TS 4.0.3 (which addresses failure to perform a surveillance requirement within the allowed surveillance interval) are applicable to IST activities, is acceptable because the surveillance intervals required by the Code for IST activities are similar to those in the TSs.

3.1.7 This group of changes involve changing the reference in the SRs (or the applicable portion of the SRs) for selected TSs, from TS 4.0.5 to the IST program. The affected TSs are SR 4.1.2.3 on charging pumps, SR 4.1.2.5 on boric acid makeup pumps, SR 4.4.2.1 on (pressurizer code) safety valves shutdown, SR 4.4.2.2 on (pressurizer code) safety valves operating, SR 4.4.8.3.1b on over pressure protection relief valves, SR 4.5.2f on ECCS subsystems pumps, SR 4.6.2.1c on containment spray pumps, SR 4.6.3.3 on containment isolation valves, SR 4.6.5 on vacuum relief valves, SR 4.7.1.1 on main steam line code safety valves, SR 4.7.1.2b on emergency feedwater pumps, SR 4.7.1.5 on main steam isolation valves, and SR 4.7.1.6a on main feedwater isolation valves. These changes are acceptable because these TSs involve IST activities that will continue to be performed in accordance with the TSs and the Code, and because they are consistent with transferring the IST program discussion in TS 4.0.5 to TS 6.5.8, as discussed above.

3.1.8 The snubber inspection program, which is defined in SR 4.7.8, references TS 4.0.5. Since 10 CFR 50.55a(f), as well as the SRs contained in the TS, govern the IST program for snubbers, the deletion of TS 4.0.5 does not change the snubber inspection program. Therefore, the deletion of reference to TS 4.0.5 in SR 4.7.8 is acceptable.

3.2 Relocation of TS 3.4.9 to the TRM and Extension of Flywheel Examination Interval

3.2.1 10 CFR 50.36(c)(2)(ii) states:

"A technical specification limiting condition for operation of a nuclear reactor must be established for each item meeting one or more of the following criteria:

(A) Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

(B) Criterion 2. A 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.

(C) Criterion 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.

(D) Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety."

If a structure, system, or component satisfies one or more of the above four criterion, then 10 CFR 50.36(c)(2)(ii) requires that a TS limiting condition for operation be established for that item or component.

TS 3.4.9, "Reactor Coolant System Structural Integrity," specifies the requirements for maintaining the structural of ASME Code Class 1, 2, and 3 components, and ensures that the structural integrity and operational readiness of the components will be maintained at an acceptable level throughout the life of the plant. These requirements serve a preventive purpose rather than a mitigative purpose. Since this TS does not fulfill any of the four criteria of 10 CFR 50.36(c)(2)(ii) on items for which TSs must be established, this TS can be relocated to the TRM. Relocation of TS 3.4.9 to the TRM does not reduce its importance in specifying the requirements of maintaining the structural integrity of ASME Code Class 1, 2, and 3 components. Further, changes to the TRM are controlled in accordance with 10 CFR 50.59(d)(1). The staff accepts this change since it has no adverse effect on the plant safety.

3.2.2 Extension of Flywheel Examination Interval

The staff's May 21,1997, Safety Evaluation (SE) on ABB Combustion Engineering Owners Group TR SIR-94-080, stated that the following issues must be addressed to justify extending the Waterford 3 RCP flywheel volumetric examination from three years to ten years.

- Verify the Reference Temperature (RT_{NDT}) for the RCP flywheels and demonstrate that the corresponding fracture toughness (K_{IC}) values are equivalent to those reported in the TR.

- Justify the use of the K_{IC} versus (T- RT_{NDT}) curve in Appendix A of the ASME Code, Section XI for flywheels made of materials other than SA 533 B and SA 508.
- Address the issue on potential loss of shrink-fit of flywheel at accident speed to prevent relative displacement between the wheel and the shaft.

In regard to verification of RT_{NDT} and K_{IC}, the licensee reported in its March 11, 2003, letter that its flywheels are manufactured out of pressure vessel quality ASTM A-543, Grade B, Class 1 steel plates, quenched and tempered having an RT_{NDT} of -40 ^{o}F for the limiting material. Therefore, the value of K_{IC}, determined analytically in accordance with ASME Code Section XI, Appendix A, 1992 Addenda, is 120 ksi $\sqrt{}$inch at 32 ^{o}F. The fracture toughness at normal RCP motor operating temperature of 100 ^{o}F is 374 ksi $\sqrt{}$inch. Since the fracture toughness at a conservatively low temperature of 32 ^{o}F and at the normal operating temperature of 100 ^{o}F exceeds the 100 ksi $\sqrt{}$inch value used in TR SIR-94-080, this condition in the SE is satisfied.

In justifying the use of K_{IC} versus (T-RT_{NDT}) curve in Appendix A of the ASME Code, Section XI for A-543 flywheels, the licensee quoted General Electric Report 34A180952, "Flywheel Integrity Report, Flywheels on RCP Motors," Revision 2, which reported K_{IC} values of 100 ksi $\sqrt{}$inch and 140 ksi $\sqrt{}$inch at 5 ^{o}F and at 32 ^{o}F, respectively, in comparison to 84 ksi $\sqrt{}$inch and 120 ksi $\sqrt{}$inch when using the $K_{I C}$ versus (T-RT_{NDT}) curve of Appendix A in the ASME Code, Section XI. Therefore, the use of the Code values for K_{IC} provides a more conservative estimate of fracture toughness for A-543 material. Moreover, the K_{IC} values at temperatures above 65 ^{o}F (those at which the RCP motor is expected to operate) are over 202 ksi $\sqrt{}$inch, which is twice the value of the K_{IC} used in the evaluation performed in TR SIR-94-080. Therefore, the staff accepts the use of the K_{IC} versus (T-RT_{NDT}) curve of Appendix A to ASME Code, Section XI for A-543 flywheels and, thus, this second condition of the SE is also satisfied.

TR SIR-94-080 states that the Waterford 3 RCP flywheel may lose its shrink fit at accident speed (design overspeed). In the original calculation, an initial shrink fit of 0.0052 inches (radial) was assumed with a calculated centrifugal displacement of 0.00584 inches (radial) at accident speed, which amounts to a loss of shrink fit. The licensee subsequently used the actual flywheel dimensions, including the bore and the shaft dimension, and reported an actual shrink fit of 0.00625 inches. With the calculated centrifugal displacement of 0.00584 inches, it can be established that there is no loss of shrink fit at accident speed. The margin provided by the shrink fit dimension at design overspeed is 0.00041 inches. Based on the licensee's revised analysis, the staff concludes that the licensee has satisfied the third SE condition.

Based on the above, the staff concludes that the extension of the volumetric examination interval for the RCP Flywheels at Waterford 3, from three years to ten years, is acceptable.

The staff also evaluated the licensee's request to relocate the SRs to a new program section in Administrative Section 6.5.7 of the TSs, consistent with guidance contained in NUREG-1432. The staff finds this to be acceptable.

3.3 Other Changes

3.3.1 Revision of index page XVI to reflect the changes made to TS 6.5, including the re-titling of TS 6.5 to "Programs," is an administrative change and is acceptable.

3.3.2 The licensee added a place keeper for TSs 6.5.1 through 6.5.6 for future changes to the administrative controls section of the TSs. The inserted statement is, "6.5.1 through 6.5.6 will be used later." This change is acceptable because it is administrative in nature.

3.3.3 Changes have been made to index pages VI, XII, and XVI to reflect the appropriate changes made in Sections 1.1 and 1.2 above. These changes are administrative in nature and, therefore, the staff finds them acceptable.

3.3.4 The licensee provided changes to the TS Bases pages B 3/4 0-4, B 3/4 0-6, B 3/4 6-6b, B 3/4 7-2d, B 3/4 7-3b, B 3/4 7-3c, and B 3/4 7-3d, which are consistent with and reflect the changes to the TSs discussed above.

3.4 Evaluation Summary

Based on the above evaluation, the staff finds that the licensee's changes to revise and transfer the IST portion of TS 4.0.5 to TS 6.5.8, to eliminate the ISI portion of TS 4.0.5, and to revise other sections of the TSs that reference TS 4.0.5 for consistency, are acceptable.

The staff has determined that the request to extend the volumetric examination interval for the RCP flywheels in TS 4.4.9 from the current three year examination requirement in accordance with Regulatory Position C.4.b of RG 1.14 to once every ten years is acceptable. In addition, the relocation of the SRs of TS 4.4.9 to Administrative Section 6.5.7, consistent with NUREG-1432, is also acceptable.

4.0 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 comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements and also 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 SRs. 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 (68 FR 28851 dated May 27, 2003). 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 amendments.

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) 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 Contributor: P. Patnaik, N. Kalyanam

Date: September 22, 2003

Waterford Steam Electric Station, Unit 3

cc:

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