



LP&L

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December 19, 1989

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

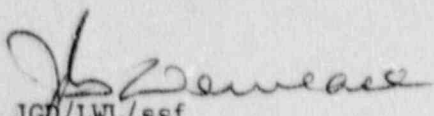
Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Technical Specification Change Request NPF-38-106

Gentlemen:

The following justifies revising Technical Specification 4.0.2 concerning the time in which to complete surveillances. This proposal conforms with Generic Letter 89-14 by requesting the same words for Specification 4.0.2 and its bases.

Should you have any questions or comments on this matter, please feel free to contact L.W. Laughlin at (504) 464-3499.

Very truly yours,



JGD/LWL/ssf

Attachments: NPF-38-106

cc: Messrs. R.D. Martin, NRC Region IV
F.J. Hebdon, NRC-NRR
D.L. Wigginton, NRC-NRR
E.L. Blake
W.M. Stevenson
NRC Resident Inspectors Office
Administrator Nuclear Energy Division (State of Louisiana)
American Nuclear Insurers

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

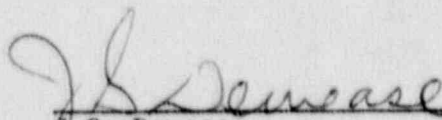
In the matter of

Louisiana Power & Light Company
Waterford 3 Steam Electric Station

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) Docket No. 50-382
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AFFIDAVIT

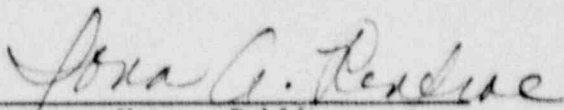
J.G. Dewease, being duly sworn, hereby deposes and says that he is Senior Vice President - Nuclear Operations of Louisiana Power & Light Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request NPF-38-106; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.



J.G. Dewease
Senior Vice President-Nuclear Operations

STATE OF LOUISIANA)
) ss
PARISH OF ORLEANS)

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 19th day of November, 1989.



Notary Public

My Commission expires with life.

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-106

The following justifies revising Technical Specification 4.0.2 concerning the time in which to perform the surveillances. This proposal conforms with Generic Letter 89-14 by requesting the same words for Specification 4.0.2 and its bases.

Existing Specifications

See Attachment A

Proposed Specifications

See Attachment B

Description

Specification 4.0.2 permits extending surveillance intervals up to twenty-five percent of the specified interval. This extension eases surveillance scheduling. It allows postponing surveillances when plant conditions are not suitable for conducting a surveillance, e.g., under transient conditions or other competing maintenance activities. Specification 4.0.2 also limits extending surveillances so the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. The 3.25 limit precludes routinely extending a surveillance interval by twenty-five percent.

Commonwealth Edison Company (CECo) submitted a lead-plant proposal for the LaSalle Technical Specifications to remove the 3.25 limit for surveillances performed during a refueling outage with an eighteen-month surveillance frequency. After discussions with the NRC staff, CECo amended the proposal to remove the 3.25 limitation for all surveillances. The staff approved the amended proposal on a lead-plant basis. Consistent with NRC policy, Generic Letter 89-14 encourages other license amendment requests to implement this line-item improvement in Technical Specification.

Experience shows the eighteen-month surveillance frequency, with the provision to extend it by twenty-five percent, usually accommodates normal variations in fuel cycle length. However, the NRC staff routinely grants requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the safety effect is low in contrast to a forced shutdown to perform these surveillances. Therefore, the 3.25 limit on surveillances has not proven a practical limit on the twenty-five percent allowance for surveillances coinciding with a refueling outage.

The allowance to extend surveillance intervals by twenty-five percent can also result in a significant safety benefit for surveillances performed on a routine basis during plant operation. This safety benefit arises when extending a surveillance deadline to a time when conditions are suitable for performing the surveillance. Examples of this include transient plant operating conditions or when safety systems are out of service because of ongoing maintenance activities. In such cases, the safety benefit derived from the twenty-five percent allowance outweighs any benefit obtained by limiting three consecutive surveillance intervals to the 3.25 limit. Also, an administrative burden exists for tracking the twenty-five percent allowance to ensure compliance with the 3.25 limit. On the basis of these considerations, the NRC concluded that removing the 3.25 limit has an overall positive impact on safety.

This proposal removes an unnecessary restriction on extending surveillance requirements and results in a benefit to safety when plant conditions are not conducive to the safe conduct of surveillance requirements. The removal of the 3.25 limit provides greater flexibility in surveillance scheduling, reduces the corresponding administrative burden, and has a positive effect on safety.

Safety Analysis

Generic Letter 89-14 presents a review of the safety significance of the proposed changes to Technical Specifications 4.0.2. The staff concluded that the proposed changes are acceptable and do not require additional review. Therefore, no significant hazards consideration exists.

The Commission provided guidance concerning standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. This proposal most closely resembles example (iv).

"(iv) A relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated. This assumes that the operating restriction and the criteria to be applied to a request for relief have been established in a prior review and that it is justified in a satisfactory way that the criteria have been met."

Generic Letter 89-14 describes a line item improvement to technical specifications approved for LaSalle and applicable to Waterford. This proposal suggests incorporating the exact words from Generic Letter 89-14 for Specification 4.0.2 and its bases.

Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed change does not constitute a significant hazards consideration as defined

by 10 CFR 50.92; and (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

ATTACHMENT A

NPF-38-106