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Director

Nuclear Safety

Waterford 3

W3F1-93-0012

A4.05

PR

April 6, 1993

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
CE Owners Group Topical Report CEN-415 Revision 1
Post Accident Sampling System Requirements

Gentlemen:

Waterford 3 endorses Combustion Engineering Owners Group (CEOG) Topical Report CEN-415 Revision 1, Modification of Post Accident Sample System (PASS) Requirements, and requests that the NRC generically review this report and issue a Safety Evaluation Report (SER) that would support relaxation of PASS requirements for CEOG plants.

While reliance on PASS has been the traditional method for meeting the intent of NUREG-0737 II.B.3, CEN-415 Revision 1 provides justification for the use of alternative methods. These alternatives employ existing plant safety grade equipment and take credit for analyses in plant Final Safety Analysis Reports. Maintenance of the PASS is both man-rem and resource intensive, therefore acceptance of these alternatives will reduce unnecessary radiation exposure by eliminating some of the calibrations, surveillances, and samples presently required by our procedures.

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U.S. Nuclear Regulatory Commission
CE Owners Group Topical Report CEN-415 Revision 1
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W3F1-93-0012
Page 2
April 6, 1993

If you have any questions, please contact Barbara Morrison at
(504) 739-6682.

Very truly yours,



R.F. Burski
Director
Nuclear Safety

RFB/BGM/stf

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