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**R. P. Barkhurst**

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Waterford 3

W3F1-93-0031

A4.05

PR

May 7, 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  
Technical Specification Change Request NPF-38-133

Gentlemen:

The attached description and safety analysis support a change to the Waterford 3 Technical Specifications. The proposed change modifies Technical Specification 6.9.1.8 "Semiannual Radioactive Effluent Release Report" and references thereto following the provisions provided in 10 CFR 50.36(a)(2) as amended in NRC Final Rule 57FR39353.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1), using the criteria in 10 CFR 50.92(c) and it has been determined that this request involves no significant hazards consideration.

Should you have any questions or comments, please contact Paul Caropino at (504) 739-6692.

Very truly yours,

R.P. Barkhurst  
Vice President, Operations  
Waterford 3

RPB/PLC/ssf

Attachment: Affidavit  
NPF-38-133

cc: J.L. Milhoan (NRC Region IV), D.L. Wigginton (NRC-NRR),  
R.B. McGehee, N.S. Reynolds, NRC Resident Inspectors Office,  
Administrator Radiation Protection Division (State of  
Louisiana), American Nuclear Insurers

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DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-38-138

The proposed change extends the Radioactive Effluent Release Report submittal frequency from semiannual to annual. References to the "Semiannual Radioactive Effluent Release Report" have been revised to "Annual Radioactive Effluent Release Report."

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Currently Technical Specification (TS) 6.9.1.8 requires the Radioactive Effluent Release Report (covering the operation of the unit during the previous six months of operation) to be submitted within 60 days after January 1 and July 1 of each year in conformance with 10 CFR 50.36a. Effective October 1, 1992, 10 CFR 50.36(a)(2) was amended (NRC Final Rule 57 FR 39353) to require the submittal of reports concerning the quantity of principal nuclides released to unrestricted areas in liquid and gaseous effluents from semiannually to annually. Accordingly the proposed change revises TS 6.9.1.8 to reflect the current requirements of 10 CFR 50.36(a)(2). The last "Radioactive Effluent Release Report" for Waterford 3 was submitted on March 1, 1993. Under the proposed change the next report will be submitted within 60 days following January 1, 1994.

Reference to the "Semiannual Radioactive Release Report" appears in the following Technical Specifications:

Definitions:	Paragraph 1.16
LCO:	3.11.1.4, Action a
Administrative Controls:	TS 6.14.2.c

The proposed change replaces "Semiannual" with "Annual" in the TS listings above.

Safety Analysis

The proposed change described above shall be deemed to involve a significant hazards consideration if there is a positive finding in any of the following areas:

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

Response: No

This change is administrative in nature and makes the TSs consistent with the amended requirement of 10 CFR 50.36(a)(2). There is no change to plant design, operation, or significant increase in the probability or consequences of an accident previously evaluated.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different type of accident from any accident previously evaluated?

Response: No.

This change is administrative in nature and makes the TSs consistent with the amended requirement of 10 CFR 50.36(a)(2). There is no change to plant design, operation, or configuration. Therefore, this change does not create the possibility of a new or different type of accident from any accident previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: No

This change is administrative in nature and makes the TSs consistent with the amended requirement of 10 CFR 50.36(a)(2). There is no change to plant design, operation, or configuration. Therefore, there is no reduction in a margin of safety.

"The Commission has provided guidance concerning the application of 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:

- (1) A purely administrative change to technical specifications, (i.e., a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature);

"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."