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May 31, 1982

L. V. MAURIN
Vice President
Nuclear Operations

W3P82-1420
3-A20.07
J.03

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, D.C. 20555

SUBJECT: Waterford 3 SES
Comments on Proposed
Changes to Technical
Specifications (10 CFR 50.36)

Dear Sir:

We have reviewed the proposed changes to technical specification requirements and are hereby forwarding our comments and questions.

We agree that the present technical specifications have grown significantly and that this has resulted in the need for more precise, yet, at the same time, somewhat flexible specifications. The present technical specifications have not really served the intended purpose of focusing attention on matters of more immediate importance to safety. Rather, the increased volume of specifications has served to dilute the matters of significant short term safety concerns with those of a much more long term effect. Also, the volume of proposed change requests serves as a notice that the proper prioritization of technical specifications needs to be undertaken. The fact that all technical specifications are presently tied to the operating license results in large amounts of paperwork for both the licensee and the NRC which, in many cases, has no effect on or significant benefit to public health and safety.

The proposed solution to the problem of the large volume of technical specifications, that is, splitting them into two distinct parts, seems to be an excellent idea. The idea of only linking to the operating license those specifications which are a day to day concern to safety would serve to decrease the burden on the operators, the licensee and the NRC. We feel that anything which can decrease the burden on the operators without having a negative impact on safety would be beneficial. We are in agreement with the six types of specifications as outlined and the prioritization of their impact on safety. It seems that, depending on the amount of specifications shifted to supplemental technical specifications, negotiations could flow smoother under the rule change.

Booi

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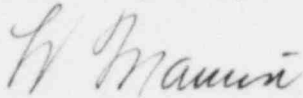
Secretary of the Commission

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Finally, it is hard to make a determination as to how much this change would reduce the volume of specifications which are directly linked to the operating license; however, if the tone of the proposed rule change is an indication, then this change could be of great benefit to the NRC, licensees, and the public.

Attached is a list of more specific questions and comments.

Yours very truly,

A handwritten signature in cursive script, appearing to read "L. V. Maurin".

L. V. Maurin

LVM/RWP/pco

Attachment

cc: S. Black

COMMENTS ON
PROPOSED TECHNICAL SPECIFICATIONS
RULE CHANGE

1. The magnitude of a reduction in the volume of specifications linked to the operating license is not apparent. A reduction on the order of 10% would not really seem to serve the purpose of reducing the burden.
2. We would be anxious to see an example of what the new technical specifications would look like in comparison to the present technical specifications. A good generic example may be comparing the present CESAR Technical Specifications to what the proposed CESAR Technical Specifications would be. Upon seeing a comparison such as this we feel we could provide much better comments.
3. The distinction between short term and long term surveillance requirements for the purposes of determining whether a requirement would be an Operational or Supplemental Technical Specification should be clearly defined by a specific time period. (1 year or a period equal to refueling outage schedule would be considered a "long term" surveillance schedule.)
4. The length of time between surveillance requirements is not the only criteria which affects the categorizations. An example of this is the Moderator Temperature Coefficient. It falls into the category of a "long term" surveillance requirement because of the infrequency of determination but at the same time it falls into the criteria for control of reactivity. It is not clear whether this example should be included in Operational Specifications or Supplemental Specifications.
5. Under Operational Specifications check and test requirements are defined as "those periodic checks and tests needed to assure that operation will be within the safety limits and that the LSSS and OLCs are met". It is further stated that, "These are the checks and tests that are generally performed by plant operators...", however, under monitoring provisions of supplemental specifications it is assumed that technicians perform most of the monitoring, inspection, testing and calibration needed to provide long term assurance that the necessary quality important to safety is maintained. It should be noted that it is generally left to the licensee to determine what testing and inspection, etc., will be performed by operators vice technicians, and can vary greatly from utility to utility. Division between Operational and Supplemental Technical Specifications should not be made on the basis of whether a technician or operator performs the test or calibration. We do agree with division on the basis of day to day importance to safety and long term, relatively unchanging, importance to safety.