



ENTERGY

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Ross P. Barkhurst
Vice President, Operations
Waterford 3

W3F1-93-0094
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PR

September 16, 1993

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-38-141

Gentlemen:

The attached description and safety analysis support a change to the Waterford 3 Technical Specifications (TS).

The proposed change modifies the Waterford 3 TS by removing the Incore Detection System requirements Limiting Condition for Operation (LCO) 3.3.3.2 from TS pursuant to the NRC Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors. This proposed change will not be applicable until Fuel Cycle 7.

The proposed change has been evaluated in accordance with 10CFR50.91(a)(1) using criteria in 10CFR50.92(c) and it has been determined that the proposed change involves no significant hazards considerations. The Plant Operating Review and Safety Review Committees have reviewed and accepted the proposed change based on the foregoing evaluation.

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

Very truly yours,



R.P. Barkhurst

Vice President, Operations

Waterford 3

RPB/PLC/dc

Attachment:

Affidavit

NPF-38-141

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

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of)
)
Entergy Operations, Incorporated) Docket No. 50-382
Waterford 3 Steam Electric Station)

AFFIDAVIT

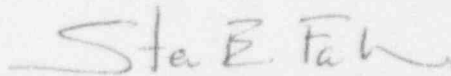
R.P. Barkhurst, being duly sworn, hereby deposes and says that he is Vice President Operations - Waterford 3 of Entergy Operations, Incorporated; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request NPF-38-141; that he 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.



R.P. Barkhurst
Vice President Operations - Waterford 3

STATE OF LOUISIANA)
) ss
PARISH OF ST. CHARLES)

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 16TH day of SEPTEMBER, 1993.



Notary Public

My Commission expires WITH LIFE.

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-141

This proposed change modifies the Waterford 3 Technical Specifications by removing the requirements associated with the Incore Detection System. The proposed change will relocate these requirements to a licensee controlled document to further the goal of Technical Specifications Improvements as delineated in NRC policy statements.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Background

The purpose of incore detection instrumentation is to provide inputs for determination of core power distributions, perform validation of the CPC power distribution and provide inputs to the COLSS.

The incore detectors provide a signal representative of core neutron flux to the Plant Monitoring Computer (PMC). The COLSS software within the PMC uses the incore detector signals to generate axial shape index, azimuthal power tilt, linear heat rate margin, and departure from nucleate boiling margin. The COLSS serves to monitor reactor core conditions accurately and provide indication and alarm functions to aid the operator. The incore detectors and the COLSS are not safety related and the COLSS is independent of the plant protection system. The Core Protection Calculators (CPCs) operate independently of COLSS using excore detectors to monitor plant safety parameters. The CPCs provide input to the safety related plant protection system.

The "Split Report" listed the Incore Detectors as an LCO which may be relocated.

Description

The proposed change removes TS 3.3.3.2; 4.3.3.2 and B 3/4.3.3.2. TS Index page V has been revised to remove reference to Incore Detectors.

On February 6, 1987, the NRC published its Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors in the Federal Register (52 FR 3788). In late 1987, based on the interim Policy Statement, each of the four nuclear steam supply system (NSSS) owners groups submitted proposals identifying requirements in the existing Standard Technical Specifications (STS) that could be relocated from the TS to licensee-controlled documents. The staff reviewed these submittals and published its conclusion in the report "NRC Staff Review of Nuclear Steam Supply System Vendor Owners Groups' Application of the Commission's interim Policy Statement Criteria to Standard Technical Specifications" ("Split Report") dated May 9, 1988.

The NRC Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors provides criteria to be utilized in determining which requirements need to be governed by TS. The goal is to assure that TS requirements are consistent with 10CFR50.36 and have a sound safety basis. The Split Report identified which STS requirements must be retained in the new STS (having met one or more criteria) and those requirements that could be relocated (having met none of the criteria).

Following the guidance of the split report, the owners groups proposed improved STS that were subsequently approved and published by the staff as improved STS NUREG reports.

CEN-355 Vol.5 "Restructured Technical Specifications, Discussion of Changes" dated May 1989, indicates that the Incore Detection TS was relocated per the criteria application. The CE restructured STS were approved by the staff and issued via NUREG-1432 "Standard Technical Specifications Combustion Engineering Plants." Therefore, Waterford 3 proposes to relocate the Incore Detection System requirements consistent with NRC approved TS improvements. Upon approval of this change, Incore Detection System requirements currently located in the TS will be relocated to the Waterford 3 Updated Final Safety Analysis Report (UFSAR) and controlled through 10CFR50.59.

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

The proposed change relocates Incore Detection System requirements from the TS to the UFSAR consistent with the NRC Policy Statement on Technical Specification Improvements. The incore detectors primary function is to provide inputs to the COLSS. The incore detectors and COLSS are not safety related and the COLSS is independent of the plant protection system. The CPCs operate independently of COLSS, using the excore detectors to preserve plant safety parameters. The proposed change does not affect any material condition of the plant that could directly contribute to causing or mitigating the effects of an accident. The TS will continue to define the LCOs required to ensure that reactor core conditions during operations remain within the initial conditions assumed in the UFSAR. Therefore, the proposed change will not involve a significant increase in the probability or consequences of any 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

The proposed change will not involve any design change. The proposed change will not alter the operation of the plant or the manner in which it is operated. Therefore, the proposed change will not create the possibility of a new or different kind 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

The proposed change will relocate Incore Detection System requirements from the TS to the UFSAR. The proposed change will have no adverse impact on the plant protection system nor will any protective boundary or safety limit be affected. Therefore, the proposed change will not involve a significant reduction in a margin of safety.

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 10CFR50.92; 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.

NPF-38-141

ATTACHMENT A