



ENTERGY

Entergy Operations, Inc.
P.O. Box 8
Kilona, LA 70066-0751
Tel 504 738 6661

Ross P. Barkhurst
Vice President, Operations
Waterford 3

W3F1-93-0305
A4.05
PR

November 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-38-145

Gentlemen:

The attached description and safety analysis support a change to the Waterford 3 Technical Specifications. This submittal requests a change to technical specification surveillance requirement 4.6.1.2.a and technical specification bases 3/4.6.1.2. The purpose of this technical specification change request is to change the periodic test schedule for Type A test from a set of three Type A tests performed at approximately equal intervals during each 10-year period, as specified in 10CFR50, Appendix J, Section III.D, to one Type A test performed at ten year intervals.

This proposed change has been evaluated in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c) and it has been determined that this request involves no significant hazards consideration.

On May 4 at the annual Regulatory Information Conference, Dr. Murley announced a pilot program, Cost Beneficial Licensing Action Initiative (CBLA), established by NRR to give special consideration to licensee

231113

9312020329 931116
PDR ADOCK 05000382
P PDR

A001
111

requests for changes requiring staff review that involve high cost and low safety benefit. In response to Dr. Murley's initiative, Entergy Operations met with NRR staff on June 8, 1993, to present an initial list of CBLAs. As discussed on June 8, 1993, the proposed change to the Appendix J Type A retest schedule is being submitted under the CBLA program.

Waterford 3 letter W3F1-93-0098 documents the exemption to 10CFR50, Appendix J, Section III.D, and this letter thus also provides the detailed justification for this technical specification amendment request.

The technical justification is predicated on the following technical bases:

1. Type A Testing History

The Waterford 3 Type A test history provides substantial justification for the proposed test schedule. Three Type A tests have been performed over an eight (8) year period with successful results. The tests indicate that Waterford 3 has a low leakage containment and that the leakage has never exceeded 24.6% of L_a .

2. Structural Capability of Containment

There are no mechanisms which would adversely affect the structural capability of the containment and that would be a factor in extending the Type A test schedule to ten years.

3. Risk Impact Assessment

A risk impact assessment was performed, and a determination was made that there is essentially no risk impact as a result of changing the Type A test schedule.

Technical Specification Change Request NPF-38-145

W3F1-93-0305

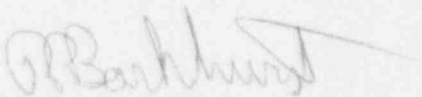
Page 3

November 16, 1993

In summary, we believe this exemption request is an excellent case of a requirement marginal to safety. The provisions of 10CFR50.12 are satisfied, the exemption is technically justified, and there is a benefit to the public health and safety.

Please contact me or Robert J. Murillo should there be any questions regarding this matter.

Very truly yours,



R.P. Barkhurst

Vice President, Operations

Waterford 3

RPB/RJM/tmm

Attachment: Affidavit
NPF-38-145

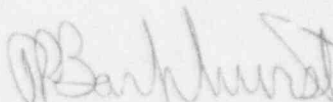
cc: J.L. Milhoan, NRC Region IV
D.L. Wigginton, NRC-NRR
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office
Administrator Radiation Protection Division
(State of Louisiana)
American Nuclear Insurers

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

AFFIDAVIT

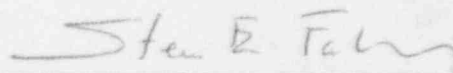
R.P. Barkhurst, being duly sworn, hereby deposes and says that he is Vice President Operations - Waterford 3 of Entergy Operations, Incorporated; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request NPF-38-145; that he 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 NOVEMBER, 1993.



Notary Public

My Commission expires WITH FE.

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-145

The proposed change requests a change to technical specification surveillance requirement 4.6.1.2.a and technical specification bases 3/4.6.1.2. The purpose of the technical specification change amendment is to change the test schedule for Type A tests from a set of three Type A tests performed at approximately equal intervals during each 10-year period, as specified in 10CFR50, Appendix J, section III.D, to one Type A test performed at ten year intervals.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Background Description

10CFR50, Appendix J, section III.D, technical specification surveillance requirement 4.6.1.2.a and technical specification bases 3/4.6.1.2 require that a set of three Type A tests be performed at approximately equal intervals during each 10-year period. This technical specification license amendment request changes the Type A schedule to one test performed at 10 year intervals. The technical justification for this request is predicated on the following technical bases:

1. Type A Testing History

The Waterford 3 Type A test history provides substantial justification for the proposed test schedule. Three Type A tests have been performed over an eight (8) year period with successful results. The tests indicate that Waterford 3 has a low leakage containment and that the leakage has never exceeded 24.6% of L_a .

2. Structural Capability of Containment

There are no mechanisms which would adversely affect the structural capability of the containment and that would be a factor in extending the type A schedule to ten years.

3. Risk Impact Assessment

A risk impact assessment was performed, and a determination was made that there is no risk impact as a results of changing the Type A test schedule.

Waterford 3 letter W3F1-93-0098 documents the exemption to 10CFR50, Appendix J, section III.D, and this letter provides the detailed justification for this technical specification amendment request.

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 an accident previously evaluated?

Response: No

The Waterford 3 Type A test history provides substantial justification for the proposed test schedule. Three type A tests have been performed over an eight (8) year period with successful results. The tests indicate that Waterford 3 has a low leakage containment and that the leakage has never exceeded 24.6% of L_a . There are no structural mechanisms which would adversely affect the structural capability of the containment and that would be a factor in extending the Type A test schedule to ten years. A risk impact assessment was performed, and a determination was made that there is no risk impact as a result of changing the Type A test schedule. 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.

There are no design changes being made that would create a new type of accident or malfunction. The proposed change will not alter the plant or the manner in which it is operated. The change proposes a change to the schedule for performing the periodic Type A test. The purpose of the

test is to provide periodic verification by test of the leaktight integrity of the primary reactor containment, and systems and components which penetrate containment. The tests assure that leakage through containment and systems and components penetrating containment will not exceed the allowable leakage rate values associated with conditions resulting from an accident. The change in schedule for performing the Type A test will not adversely affect the containment integrity in the event of an accident. Therefore, the proposed change will 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

The proposed change is a change to the schedule for performing the periodic Type A tests and does not reduce the margin of safety assumed in accident analysis for release of radioactive materials from the containment atmosphere into the environment or any margin of safety preserved by the Technical Specifications. The methodology, acceptance criteria, and the technical specification leakage limits for the performance of the Type A tests will not change, and the Type A tests will be performed in accordance with 10CFR 50, Appendix J, and the Waterford 3 licensing basis. 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 10 CFR 50.92; (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.