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Washington D.C.

W3F1-94-0080

A4.05

PR

August 1, 1994

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  
Request for Additional Information Regarding NPF-38-132

Gentlemen:

By letter W3F1-92-0503 dated February 5, 1993, Waterford 3 proposed a change to the Administrative Section of the Technical Specifications (TS). The proposed change sought to amend the Waterford 3 TS by incorporating a Technical Review and Control Process to supplement the onsite technical review and approval of procedures affecting nuclear safety.

The proposed Technical Review and Control Process would modify the scope of procedures required to be reviewed by the Plant Operating Review Committee (PORC). The Technical Review and Control Process requires an independent review to be performed by a qualified individual knowledgeable in the affected area, other than the individual who prepared the procedure. The designated technical reviewer will insure that the procedure is technically correct and be responsible for determining if a cross-disciplinary review is required and the extent of such reviews.

Proposed TS 6.5.3.b states "Individuals performing these reviews shall meet the applicable qualifications of TS 6.3." TS 6.3 (entitled UNIT STAFF QUALIFICATIONS), requires each member of the unit staff to meet the qualifications of ANSI/ANS 3.1-1978.

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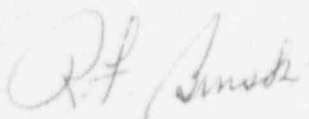
The NRC review staff raised a concern with determining the applicable qualifications of 6.3. Specifically, the staff considered the minimum qualification requirements of ANSI 3.1 subsection 4.5.2 (entitled Technicians) and 4.5.3 (entitled Maintenance Personnel) as inadequate in ensuring that personnel performing technical reviews would have the necessary technical knowledge base.

Waterford 3 acknowledges the staff's concern and proposes to clarify TS 6.5.3.b by replacing the words "specified by 6.3" with "of ANSI/ANS 3.1-1978, Section 4.0, excluding subsections 4.5.2 and 4.5.3." This clarification is not intended to exclude the involvement of technicians or maintenance personnel in the procedure development, review and control process. As stated in our original submittal, one of the benefits expected to be realized by implementing the proposed process is the better utilization of the technical knowledge of personnel in the affected area to effect changes to procedures, while providing adequate controls to ensure an acceptable level of independent review.

The clarification described above has no affect on the safety analysis and no significant hazards determination supplied with our original submittal.

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

Very truly yours,



R.F. Burski  
Director  
Nuclear Safety

RFB/PLC/ssf

cc: L.J. Callan (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