



ENTERGY

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Vice President, Operations
Waterford 3

W3F1-94-0093

A4.05

PR

August 9, 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
Technical Specification Change Request NPF-38-156

Gentlemen:

The attached description and safety analysis supports a change to the Waterford 3 Technical Specifications (TS). The proposed change modifies Section 6.0 Administrative controls, by relocating the functions under Review and Audit to the Waterford 3 Quality Assurance Program Manual. The proposed change also incorporates the TS line-item-improvement of Generic Letter 93-07, Modification Of The Technical Specification Administrative Control Requirements For Emergency And Security Plans, dated December 28, 1993.

The proposed change is intended to reduce regulatory burden by relocating TS requirements that are duplicated by other regulatory requirements. This request follows the recommendations of Generic Letter 93-07 and is similar to a change reviewed and approved by the NRC staff for Florida Power Corporation, Crystal River 3.

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 Operations Review and Safety Review Committees have reviewed and accepted the proposed change based on the foregoing evaluation.

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Technical Specification Change Request NPF-38-156

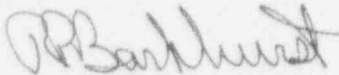
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Should you have any questions or comments on this matter, please contact Paul Caropino at (504) 739-6692.

Very truly yours,



R.P. Barkhurst

Vice President, Operations
Waterford 3

RPB/PLC/ssf

Attachment:

Affidavit
NPF-38-156

cc:

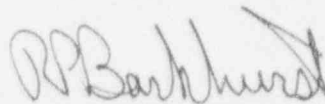
L.J. Callan, NRC Region IV
D.L. Wigginton, NRC-NRR
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office
Administrator Radiation Protection Division
(State of Louisiana)
American Nuclear Insurers

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

AFFIDAVIT

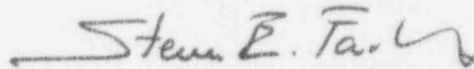
R.P. Barkhurst, being duly sworn, hereby deposes and says that he is Vice President Operations - Waterford 3 of Entergy Operations, Incorporated; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request NPF-38-156; that he 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 9TH day of AUGUST, 1994.



Notary Public

My Commission expires WITH LIFE.

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-156

The proposed change modifies Section 6.0 Administrative controls by removing the requirements under 6.5, Review and Audit. These requirements will be relocated to the Waterford 3 Quality Assurance Program Manual (QAPM), Emergency Plan, or Security Plan as described herein.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Note: This proposed TS change impacts a previous change request currently in NRC review (i.e., TSCR NPF-38-132). Text that is added by this proposed change is marked with revision bars and underlined. Text proposed by NPF-38-132 is double underlined.

Background

The Administrative controls Section of the Waterford 3 TS are based on the Combustion Engineering Standard Technical Specifications (CE-STs) NUREG 0212. The functions under Review and Audit, Section 6.5 of the STs and Waterford 3 TS, are based on requirements prescribed by ANSI N18.7/ANS 3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," Section 4, Reviews and Audits.

In addition to the TS requirements, Waterford 3 is committed to Regulatory Guide 1.33 which endorses ANSI N18.7/ANS 3.2. This commitment defines the mandatory requirements to comply with the criteria of 10 CFR 50 Appendix B and NUREG 0800 (Standard Review Plan Chapter 17). The commitment to RG 1.33 and the description of ANSI N18.7 requirements are provided in the Waterford 3 QAPM. Changes to the QAPM are subject to the criteria of 10 CFR 50.54.

The NRC and NSSS Owners Groups (in the effort to improve technical specifications) have recognized that licensees generally duplicate administrative control requirements, similar to that described above.

The NRC Policy Statement on Technical Specification Improvements for Nuclear Power Reactors provides the following criteria that delineate those constraints on design and operation of nuclear power plants that are derived from the plant safety analysis report or probabilistic safety assessment information and that belong in Technical Specifications in accordance with 10 CFR 50.36:

- Criterion 1: Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.
- Criterion 2: A process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
- Criterion 3: A structure, system, or component that is part of the primary success path and which functions to actuate or mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to a fission product barrier.
- Criterion 4: A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

The NRC staff, observing the policy described above, concluded in their review of administrative controls for the improved standard technical specifications that provisions (e.g., Review and Audit) can be relocated to other licensee documents for which changes to those provisions are adequately controlled by other regulatory requirements.

The NRC staff in a Safety Evaluation Report, dated December 20, 1993, (for Florida Power Corporations' Crystal River Unit 3) approved a license amendment request which in part relocated the Review and Audit functions from the TS on the basis that they are adequately controlled elsewhere.

This proposed change also adopts the TS line-item-improvement in accordance with the recommendations of Generic Letter (GL) 93-37, Modification Of The Technical Specification Administrative Control Requirements For Emergency And Security Plans, dated December 28, 1993. Per GL 93-07, the review of the emergency and security plans and implementing procedures are removed from the list of responsibilities of the Plant Operations Review Committee (PORC).

Also, the requirements to review procedures and procedure changes for implementation of the emergency and security plans are relocated to the respective plan.

Description

This proposed change removes the Review and Audit functions under 6.5.1 Plant Operations Review Committee (PORC), 6.5.2 Safety Review Committee (SRC), and 6.5.3 Technical Review and Control Process (TS 6.5.3 is currently pending NRC approval pursuant to Waterford 3 TS Change Request NPF-38-132, dated February 5, 1993). Pages deleted by this change are replaced with a single page stating, "Pages 6-9 through page 6-12 Not used. Next page is 6-13."

The proposed change modifies other specifications as follows:

- The security plan and emergency plan are removed from TS 6.8.1 and replaced with the words "Not used."
- Reference to TS 6.5.1.6k is deleted from the review requirement appearing in ACTION 2, on Table 3.3-1 and ACTION 13, on Table 3.3-3. The requirement is retained, however, the ACTION statements are modified by indicating that a PORC review is required in accordance with plant administrative procedures.
- TS 6.8.2 and 6.8.3 are modified by removing reference to 6.5.
- TS 6.10.3 Item n is removed and replaced with the words "Not used" and Item i is revised to include "Quality Assurance Program Manual."

Discussion

The proposed change will relocate the Review and Audit functions from the TS on the basis that they are adequately controlled elsewhere. These TS requirements are not necessary to assure the safe operation of Waterford 3, given the requirements described in the QAPM that implement 10 CFR 50.54 and 10 CFR 50, Appendix B. These requirements provide sufficient control for the review and audit functions except those associated with the security and emergency plans. The security and emergency plan review and audit functions are relocated to their respective plans in accordance with Generic Letter 93-07.

REVIEW and AUDIT

The on-site review [TS 6.5.1 Plant Operations Review Committee (PORC)] function, composition, alternates, meeting frequency, quorum, responsibilities, authority and records are covered in ANSI N18.7. These requirements are included in the QAPM and subject to the change control criteria of 10 CFR 50.54.

The off-site review group [TS 6.5.2 Safety Review Committee (SRC)] is also addressed in ANSI N18.7. The QAPM will include the requirements for the SRC such that duplication in the TS is unnecessary.

Audit requirements (TS 6.5.2.8) are specified in the QAPM to satisfy 10 CFR 50, Appendix B, Criterion XVIII. Audits are also covered by ANSI N18.7, 10 CFR 50.54(t), 50.54(p), and 10 CFR 73. Therefore, duplication of these regulatory requirements does not enhance the level of safety, nor are the provisions relating to audits in the TS necessary to assure safe operation of Waterford 3.

The Technical Review and Control Process (i.e., proposed TS 6.5.3) will be relocated to the QAPM upon NRC approval. Technical reviews are addressed by ANSI N18.7 such that duplication in the TS is unnecessary.

The Quality Assurance program implements 10 CFR 50, Appendix B and is subject to the control criteria of 10 CFR 50.54. Those provisions that are not otherwise covered by regulatory requirements will be relocated to the QAPM.

SECURITY PLAN and EMERGENCY PLAN

The Emergency Plan and Security Plan review and audit functions (TS 6.5.1.6 i&j, 6.8.1 d&e) are specified in 10 CFR Part 50, Appendix E Section V, 50.54, 73.40, 73.55, and 73.56. Waterford 3 will retain emergency plan and security plan review and audit functions in a manner that fully satisfies the regulatory requirements. These requirements will be addressed in the respective plan consistent with GL 93-07.

TS 6.10.3 item n specifies record retention for audits. Record retention is addressed by ANSI N18.7 and ANSI N45.2.9. This requirement will be included in the QAPM such that duplication in the TS is unnecessary.

The following modifications are purely administrative changes that are necessary in support of the proposed TS change:

- TS 3/4.3.1 Reactor Protective Instrumentation, Table 3.3-1 Action 2, and TS 3/4.3.2 Engineered Safety Features Actuation System Instrumentation, Table 3.3-3 Action 13 contain a statement which requires the PORC to conduct a special review in accordance with TS 6.5.1.k if an inoperable instrumentation channel is placed in bypass. This statement is modified by removing reference to 6.5.1.k and indicating that a documented review by the Plant Operations Review Committee is required in accordance with plant administrative procedures.
- The reference to TS 6.5 is removed in TS 6.8.2 and TS 6.8.3.c.
- The PORC and SRC acronyms are spelled out in TS 6.6.1.b.
- "QA Manual" is revised to "Quality Assurance Program Manual", in TS 6.10.3.i.

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 the proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

Response: No

The proposed change will have no affect on design bases accidents nor will the change directly affect any material condition of the plant that could directly contribute to causing or mitigating the effects of an accident. Relocating Review and Audit functions from the TS is consistent with the NRC Final Policy Statement on Technical Specifications Improvements and will have no negative impact on plant operation or safety. 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 kind of accident from any accident previously evaluated?

Response: No

The proposed change will not alter the operation of the plant or the manner in which the plant is operated. The change will not involve a design change or introduce any new failure modes. 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 the margin of safety?

Response: No

The proposed change is administrative in nature. The Waterford 3 safety margins are defined and maintained by the Technical Specifications in Sections 2-5 which are unaffected. 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; 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--38-156

ATTACHMENT A