



ENTERGY

Entergy Operations, Inc.

P.O. Box 8
Kilcrist, LA 70066
Tel 504 739 6774

R. F. Burski

Director
Nuclear Safety
Waterford 3

W3F1-94-0164

A4.05

PR

September 16, 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
Supplemental Information Regarding Emergency Technical
Specification Change Request NPF-38-158

Gentlemen:

The purpose of this letter is to provide supplemental information concerning the Waterford 3 Emergency Technical Specification Change Request NPF-38-158 dated September 9, 1994.

The proposed change adds a provision (in the form of a note) applicable to the integrated Emergency Diesel Generator (EDG) surveillance tests of Technical Specification (TS) 4.8.1.1.2.d. The added provision, in part, would allow alternative operability testing in lieu of the specified integrated tests for the major AB ESF loads. The last sentence of the proposed change states, "The testing will include any series of sequential, overlapping, or total steps so that the entire connection and loading sequences is verified." The intent of this statement was to define the alternative type of testing in contrast to the specified integrated tests. However, after discussions with the NRC staff, it was observed that the literal application of this statement under all circumstances may result in subjecting the plant to undue risk. Waterford 3 intends to test the applicable AB components in a manner that shows the capability of the components to perform their function and avoid the potential for undesired operation.

Based on the above, Waterford 3 proposes that the last sentence of the proposed change be deleted.

200086

9409230014 940916
PDR ADDCK 05000382
P PDR

A001
11/10

Supplemental Information Regarding Emergency Technical Specification Change
Request NPF-38-158

W3F1-94-0164

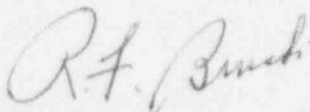
Page 2

September 16, 1994

Whenever an emergency situation exists, a licensee requesting an amendment must explain why this emergency situation occurred and why it could not avoid this situation. As indicated in our initial submittal, Waterford 3 discovered a condition that resulted in a situation where failure to act in a timely way would result in a plant shutdown. Specifically, the discovery of non-compliance with TS surveillance requirements resulted in the failure to meet the Operability requirements of LCO 3.8.1. Because this condition was recently discovered, the resulting situation could not be avoided. Waterford 3 proposed NPF-38-158 as the basis for interim plant operation, and requested an NRC expedited review in accordance with the provisions of 10CFR50.91(a)(5).

Should you have further questions concerning this information, please contact D.W. Vinci at (504) 739-6370.

Very truly yours,



R.F. Burski
Director
Nuclear Safety

RFB/PLC/ssf

cc:

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