



**ENTERGY**

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Signature: [illegible]

W3F1-94-0172

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October 18, 1994

U.S. Nuclear Regulatory Commission

Attn: Document Control Desk

Washington, DC 20555

Subject: Waterford 3 SES  
Docket No. 50-382  
License No. NPF-38  
Request for NRC Review and Approval of Revisions  
to Waterford 3 Emergency Classification Procedure

Gentlemen:

Waterford 3(W3) has recently approved, but not implemented, changes to the initiating conditions/emergency action levels used in the Waterford 3 emergency classification system. The current emergency classification system is described in revision 20 of the Waterford 3 Emergency Plan and revision 16 of Emergency Plan Implementing Procedure EP-001-001 "Recognition and Classification of Emergency Conditions". Waterford 3 has performed a 50.54(q) evaluation of these changes and determined that these changes do not decrease the effectiveness of the Emergency Plan and continue to meet the standards of 50.47(b). Because of the interest that the NRC has displayed in emergency action levels in the past, Waterford 3 is submitting its proposed Emergency Plan changes and Emergency Plan Implementing Procedure EP-001-001 proposed revision 17 to you to obtain approval prior to implementation.

Accordingly, Enclosure 1 contains marked-up affected pages of the current W3 Emergency Plan, the proposed Waterford 3 Emergency Plan Implementing Procedure EP-001-001 and justification for changes/deletions for selected W3 emergency classification initiating conditions.

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Summary and Justification

The enclosed revisions are proposed to improve the overall effectiveness of the W3 Emergency Preparedness program. Specifically, the initiating conditions/emergency action levels considered for emergency classification have been reviewed and revised based on past W3 and industry emergency declaration experiences, professional meeting findings, and recent industry publications. While it is important to declare an emergency when certain predetermined conditions and action levels are met, it is also important that events which do not represent a credible risk to the plant and consequently to the public not be classified as an emergency. Unnecessary emergency classification imposes an undue burden upon the public and creates a negative impact on the daily operations of the various offsite agencies.

The proposed revisions eliminate emergency classification of some events which are determined to be either inside the operating safety envelope for the plant as defined by the plant's technical specifications, including limiting conditions of operation and the associated action statement times, or events not recognized as precursors for more serious events which have potential for impact on plant safety related structures and systems. Examples of events which are proposed for elimination under these criteria are the current required emergency classification of Notification of Unusual Event for a W3 shutdown as required by a technical specification action statement, and transportation of a contaminated and injured individual offsite, respectively.

The attached proposed change is similar to a change recently approved by the NRC for Comanche Peak Steam Electric Station, Docket Numbers 50-445 and 50-446.

Discussion with State and Local Officials

Waterford 3 has discussed the proposed changes with representatives of the offsite (State and Parish) emergency organizations and they have endorsed these changes.

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Notification of NRC by 10CFR50.72(b)

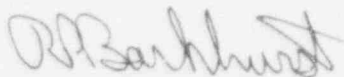
Some of the events affected by the proposed changes are covered by 10CFR50.72(b), Non-Emergency Events. For these events, the NRC would continue to be notified as required.

Proposed Schedule for implementation

Waterford 3 is requesting that a decision on approval be made by December 1, 1994.

Please contact F.J. Englebracht, Emergency Planning and Administration Manager, at (504) 739-6607 should you have any questions concerning the revised plan.

Very truly yours,



R.P. Barkhurst  
Vice President, Operations  
Waterford 3

RPB/GCS/tjs  
Enclosure

cc: (w/o Enclosure)  
L.J. Callan (2 copies)

(w/o Enclosure)  
F. Kantor, NRC-NRR, R.B. McGehee, N.S. Reynolds,  
NRC Resident Inspectors Office