



**ENTERGY**

Entergy Operations, Inc.

P.O. Box B  
Kilona, LA 70066-0751  
Tel 504 739 6661

**Ross P. Barkhurst**

Vice-President Operations  
Waterford 3

W3F1-95-0007

A4.05

PR

January 19, 1995

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-38-164

Gentlemen:

The attached description and safety analysis support a change to the Waterford 3 Technical Specifications (TS).

The proposed change will modify the TS by adding a new Technical Specification, TS 3.0.5, and the associated Bases. The new TS 3.0.5 establishes the allowance of equipment removed from service or declared inoperable to comply with ACTIONS to be returned to service under administrative controls solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This proposed change is based on the Combustion Engineering improved Standard Technical Specifications (STS) approved and issued by the NRC as NUREG 1432.

At the present time, the circumstances surrounding this proposed change do not meet the NRC's criteria for exigent or emergency review. However, the additional provisions of the proposed TS 3.0.5 will allow Waterford 3 to conduct specified surveillance testing on High Pressure Safety Injection Pump A. If this surveillance testing is not performed on or before March 12, 1995, Waterford 3 will have to enter a 72 hour Action due to one Emergency Core Cooling System subsystem being inoperable (TS 3.5.2.a.). Based on the above Waterford 3 respectfully requests an expeditious review.

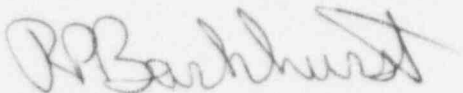
200004  
9501250453 950119  
PDR ADDCK 05000382  
P PDR

ADD 1/1

Technical Specification Change Request NPF-38-164  
W3F1-95-0007  
Page 2  
January 19, 1995

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

Very truly yours,



R.P. Barkhurst  
Vice President, Operations  
Waterford 3

RPB/RTK/ssf

Attachment: Affidavit  
NPF-38-164

cc: L.J. Callan, NRC Region IV  
C.P. Patel, 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

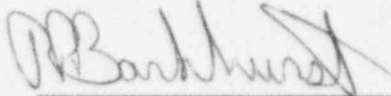
In the matter of )

Entergy Operations, Incorporated )  
Waterford 3 Steam Electric Station )

Docket No. 50-382

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-38-164; 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 19<sup>TH</sup> day of JANUARY, 1995.



Notary Public

My Commission expires WITH LIFE.

DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF 38-164

The proposed change will modify the Waterford 3 Technical Specifications (TS) by adding TS 3.0.5 and its associated Bases. This new specification will allow equipment removed from service or declared inoperable to comply with ACTIONS to be returned to service under administrative controls solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This proposed change is based on the Combustion Engineering improved Standard Technical Specifications (STS) approved and issued by the NRC as NUREG 1432.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Background

On October 7, 1994, a leakage path for Safety Injection Tank (SIT) 1A was identified. Leakage in excess of the allowed maximum pathway leakage for containment isolation valve SI-343 was discovered. SI-343 is a normally closed air operated globe valve located inside the containment building. This valve was subsequently declared inoperable and Technical Specification 3.0.5 "Containment Isolation Valves" Action "c" was entered. This Action requires, with one or more of the isolation valves inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange. To comply with this Action "c", containment isolation valve SI-344 was closed. SI-344 is a normally locked closed, manually operated globe valve located outside the containment building. Waterford 3 planned to repair SI-343. However, SI-343 is located in containment and after further evaluation it was decided to repair this valve at the next refueling interval. The function of the Containment Isolation System (CIS) is to isolate fluid systems that pass through the primary containment vessel to confine any radioactivity that may be released following a LOCA or Main Steam Line Break (MSLB) inside containment.

TS Surveillance 4.5.2.f requires that each of the safety injection pumps that are required to be operable performs as indicated on recirculation flow when tested pursuant to Specification 4.0.5. Containment isolation valves SI-343 and SI-344 are located within the line used to perform Surveillance 4.5.2.f and these valves must be open to establish a stable recirculation flow path. The proposed change will allow SI-343 and SI-344 to be open under administrative controls for the time required to perform TS Surveillance 4.5.2.f.

#### Proposed Change

Waterford 3 Technical Specifications neither specifically allow nor prohibit re-entry into ACTION statements. The Combustion Engineering improved STS (NUREG 1432) incorporates a provision that allows systems or components to be returned to service for the performance of testing required to demonstrate equipment OPERABILITY. This new provision enhances plant safety by providing greater assurance that systems or components important to plant safety can be returned to and maintained in operable status.

This change will add page 3/4 0-1a to the Technical Specifications which will state the following. "Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative controls solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY." In addition, the Technical Specification Bases section will be updated to add the Bases for TS 3.0.5.

#### 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 proposed change will allow an orderly return to service of inoperable equipment. Specification 3.0.5 will permit equipment removed from service to comply with required Actions to be returned to service under administrative controls to verify the operability of the equipment being returned to service or operability of other equipment. The administrative controls will ensure the time involved will be limited to only the time required to demonstrate the component or system operability. This new specification provides an acceptable method of demonstrating the operability of TS equipment before it is returned to service and allows for verifying other TS equipment is operable. 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.

The proposed change will not alter the operation of the plant or the manner in which the plant is operated. The equipment is only being tested in its design configuration or being returned to service to allow testing of another component or system. 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 a margin of safety?

Response: No

The proposed Specification will only allow the return to service of equipment that is expected to fulfill its safety function. The use of Specification 3.0.5 will be limited to the performance of testing on the equipment being returned to service or on other equipment that is dependent on the equipment being returned to service. The testing is limited to post maintenance testing and testing to prove operability. 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 10CFR50.92; 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-38-164

ATTACHMENT A