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W3F1-91-0437
A4.05
QA

July 18, 1991

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-38-116

Gentlemen:

On August 9, 1988, the NRC granted Waterford 3 a temporary change to Technical Specification (TS) Bases, B 3/4.7.6, "Control Room Air Conditioning System." In the letter granting approval, the NRC recommended that consideration be given to making a permanent revision to TS 3.7.6, "Control Room Air Conditioning System." On March 21, 1989, this request, identified as NPF-38-95, was submitted. It proposed to subdivide TS 3.7.6 into four TSs covering three separate functions: Control Room Emergency Air Filtration System, Control Room Air Temperature, and Control Room Isolation and Pressurization. The intent of this change was to clearly relate the system design function to the surveillance program and TS limiting conditions for operation (LCOs). Changes to the bases were included to reflect these changes to the TS.

Since then, this submittal has undergone several changes as a result of discussions and correspondence following the original submittal. For convenience, the enclosed change request and safety analysis incorporates all of this information and is to replace the original request, NPF-38-95.

Because the design of the Waterford 3 Control Room Air Conditioning System is complex and therefore, difficult to describe, we would appreciate the opportunity to present this TS change request directly to the staff at your convenience. Based on the positive impact of the March, 1990, meeting on this subject, we feel strongly that a direct presentation of this material will again eliminate confusion and streamline the review process. Until such time, the description of CRACS and accompanying drawings provided during the March, 1990 presentation may assist the Staff in its initial review of this submittal.

A001

Please direct any questions or comments to Tim Gaudet on (504) 739-6666.

Very truly yours,

RPB/DAR/ssf
Attachments: Affidavit
NPF-38-116

cc: R.D. Martin, NRC Region IV
D.L. Wigginton, NRC-NRR
R.B. McGehee
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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-38-116; 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 18th day of July, 1991.

Notary Public

My Commission expires at death

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-116

This justifies an amendment to the Waterford 3 Technical Specifications that subdivides TS 3/4.7.6, "Control Room Air Conditioning System," into four separate TSs covering three functions: Control Room Emergency Air Filtration System, control room air temperature, and control room isolation and pressurization.

Existing Specifications

See Attachment A

Proposed Specifications

See Attachment B

Description

This change subdivides Waterford 3 TS 3/4.7.6, "Control Room Air Conditioning System" (CRACS) into four TSs covering three separate functions. New TSs 3/4.7.6.1 and 3/4.7.6.2 will address requirements for operability of the Control Room Emergency Air Filtration System during Modes 1 through 4, and Modes 5 and 6, respectively. TS 3/4.7.6.3 is added to address requirements for control room air temperature during all modes of operation, and 3/4.7.6.4 to address requirements for control room isolation and pressurization during all modes of operation.

Habitability systems are provided to assure that operators can remain in the control room and take effective actions to operate the plant safely under normal operation and maintain the plant in a safe condition following an accident. The CRACS and the emergency filtration units are both designed and installed such that they can be operated together or separately as the situation dictates. The CRACS components are designed to cool and heat the control room envelope while the emergency filtration units are designed to remove radioactivity from the control room envelope air. At Waterford 3, the CRACS and emergency filtration units are not functionally dependent upon each other. However, in its present form, TS 3.4.7.6 does not differentiate between these functions to determine operability. Furthermore, four other inadequacies related to the function of control room isolation and pressurization exist in the present specification. These involve the following:

1. Maintenance: No provisions exist for the conduct of routine maintenance or the installation of necessary modifications to the plant if that work involves a breach in the control room envelope.

2. Allowable out[illegible]me: No provisions exist for an allowed outage time (AOT) to ide[illegible]d correct unidentified breaches to the control room envelope. Cu[illegible]y, any loss of envelope integrity immediately places the plant in a Tech[illegible] Specification 3.0.3 action statement. This means that within one hour, action shall be initiated to place the plant in a mode in which the specification does not apply by placing it, as applicable, in at least hot standby within the next six hours, at least hot shutdown within the following six hours, and at least cold shutdown within the subsequent twenty-four hours.

3. Make-up air flow requirements: Recent operational experience reflects the importance to clearly specify all control room envelope operability requirements in the specification. Currently, a restriction on differential pressure exists for the control room envelope, only; there are no requirements on the allowable make-up air flow rate associated with the differential pressure.

4. Toxic chemical threat to operators: No provisions exist in the present specification that recognize the threat to plant operations personnel from a toxic chemical release concurrent with a breach in the control room envelope when the plant is in Modes 5 or 6. The possibility of a toxic gas event is unrelated to the operational mode.

The proposed change addresses all these concerns. It increases operational flexibility while still maintaining the requisite level of protection.

The CRACS consists of two full capacity redundant air handling units (AH-12 (3A-SA) and AH-12 (3B-SB)), a computer room supplementary air handling unit (AH-31 (3)), two toilet exhaust fans, each with one hundred percent capacity (E-34 (3A-SA) and E-34 (3B-SB)), and a conference room and kitchen exhaust fan (E-42 (3)). The Chilled Water System supplies cooling water to the coils to the AH-12 units. The AH-31 (3) unit does not have a safety related function.

Separately, two full capacity, redundant emergency air filtration units (S-8 (3A-SA) and S-8 (3B-SB)) assure radionuclide filtration following a design basis accident. No cooling coils are provided in the S-8 units; however, S-8 heating coils are provided for proper charcoal filter operation.

3/4.7.6.1 and 3/4.7.6.2, Emergency Air Filtration

The existing TS addresses all functional aspects of the CRACS. This proposed change incorporates action statements from the existing TS applicable to the Control Room Emergency Air Filtration System into two new TSs, TS 3/4.7.6.1 applicable for Modes 1 through 4, and TS 3/4.7.6.2 for Modes 5 and 6. All requirements in the proposed TSs are from the existing specification with two exceptions.

1. The existing TS has no action statement addressing the inoperability of both trains of emergency air filtration while in Operational Modes 1 through 4. As such, required action would be in accordance with TS 3.0.3. As stated above, this means that within one hour, action shall be initiated to place the plant in a mode in which the specification does not apply by placing it, as applicable, in at least hot standby within the next six hours, at least hot shutdown within the following six hours, and at least cold shutdown within the subsequent twenty-four hours.

The new specification addresses the inoperability of both trains with the action statement,

> "With both control room emergency air filtration trains inoperable, restore one train to OPERABLE status or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

This is essentially the action required by TS 3.0.3 except TS 3.0.3 requires initiating action to be taken in the first hour. Regardless, the real protection of the TS, the hot standby and cold shutdown conditions, are required to be reached by both specifications within the next six and the following thirty hours. This is similar to other action statements. Despite the lack of the required initiating action within one hour, the proposed action statement offers protection equivalent to the existing action statement.

2. The existing TS has action statements addressing either one or both trains of emergency air filtration inoperable while in Operational Modes 5 and 6. The requested TS, 3/4.7.6.2 only addresses the inoperability of both trains. As such, no action is required in Modes 5 or 6 if one train is inoperable.

   During an emergency, both S-8 units are started to provide filtration and adsorption of outside air and control room envelope recirculated air (reference: FSAR 6.4.3.3). Dosages received in the control room after a full power design basis loss of coolant accident (LOCA) were calculated to be orders of magnitude higher than other accidents involving radiation releases to the environment. Because the consequences of a full power design basis LOCA are more severe than those occurring during COLD SHUTDOWN and REFUELING, specification 3/4.7.6.2 requires only one OPERABLE S-8 unit to guard against accidents during Modes 5 and 6. This is typical for similar TSs during Modes 5 and 6.

All other requirements for the emergency air filtration system in the existing TS are specified in the amended TS. As such, the full protection of the original specification regarding emergency air filtration is retained in proposed TSs 3/4.7.6.1 and 3/4.7.6.2.

3/4.7.6.3, Control Room Air Temperature

Proposed TS 3/4.7.6.3 addresses requirements for control room air temperature. In the existing TS, the action statements require different operability levels based on the operational mode. From the existing TS:

MODES 1 through 4:

> "With one control room air conditioning system inoperable, restore the inoperable system to OPERABLE status with 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

MODES 5 and 6:

a. "With one control room air conditioning system inoperable, restore the inoperable system to OPERABLE status within 7 days or initiate and maintain operation of the remaining OPERABLE control room air conditioning system in the recirculation mode.

b. "With both control room air conditioning systems inoperable, or with the OPERABLE control room air conditioning system, required to be in the recirculation mode by action a, not capable of being powered by an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS or positive reactivity changes."

For Modes 1 through 4, operator actions are retained in proposed action statement "a". For Modes 5 and 6, existing Action Statement "a" (above) protects against toxic gas and radiological events. It is unrelated to the maintenance of control room temperature, and therefore is irrelevant to the subject function of TS 3/4.7.6.3. However, Action Statement "b" has direct relevance and therefore, is retained in the amended TS as Action Statement "c" with a qualifier identifying the cause of the inoperability to be a loss of cooling capability.

Proposed Action Statements "b" and "d" cover occurrences when both units are inoperable due to a loss of cooling capability (Action "b") or a loss of air circulation capability (Action "d"):

b. "With two control room air conditioning units inoperable due to a loss of cooling capability, return one unit to an OPERABLE status within 3 hours or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

d. "With two control room air conditioning units inoperable due to a loss of air circulation capability, take the appropriate ACTION in Specification 3.7.6.1 or 3.7.6.2."

With both units inoperable, the existing TS requires actions to be taken in accordance with TS 3.0.3 which allows one hour before initiating shutdown. Action Statement "b" from the proposal allows a three hour AOT. A common cause for failure of one of these units is the loss of a chiller. By providing three hours before initiating shutdown, sufficient time exists for the operators to identify the problem, transfer busses and align the standby chiller and return the unit to operable service. This also assures the Waterford 3 remains below the maximum temperature limit allowed in the station blackout analysis. Although three hours are less restrictive than TS 3.0.3, this change is supported by the Waterford 3 station blackout analysis.

Proposed Action Statement "d" addresses both units being out of service due to a loss of air circulation capability. Under these conditions, it defers to the appropriate action statements from the TS for emergency air filtration. Although it directs the operator to another specification, this statement is included here to acknowledge air circulation capability as a function of the control room air conditioning units.

The proposed surveillance requirement for TS 3/4.7.6.3 requires the average air temperature to be verified to be less than 80°F at least once every twelve hours. Presently, the temperature is to be verified every twelve hours as being less than 110°F. Since the proposed surveillance specifies 80°F, it is more restrictive than the existing.

80°F was chosen for several reasons. In the Waterford 3 Final Safety Analysis Report, the control room design temperature is defined to be 75°F. By defining 80°F for the surveillance, some variance from the design temperature is allowed. 80°F is also consistent with the initial conditions for the current station blackout calculation. Furthermore, the proposed surveillance is more realistic for determination of operability of the air coolers since a unit will be inoperable long before temperatures reach 110°F.

3/4.7 6.4, Control Room Isolation and Pressurization

There are four perceived inadequacies related to the function of control room isolation and pressurization as it is presently described in the TSs. These are:

1. The existing specification is silent with respect to the threat to plant operations personnel from a toxic chemical release concurrent with a breach in the control room envelope.

2. The existing specification does not include a limit on the allowable make-up air flow rate associated with the pressurization surveillance.

3. In the existing TS, there is no true allowance made for the conduct of routine maintenance or the installation of necessary modifications to the plant if that work involves a breach in the control room envelope.

4. The present specification is inflexible with respect to a loss of control room envelope integrity while the plant is at power.

The proposed change creates a specification that retains requirements from the original TS while addressing all of the above concerns.

The proposed change adds action statements, not in the present TS, specific to the function for control room isolation and pressurization. Actions "a" and "b" address operability of the control room isolation valve normal outside air flow path and the emergency filter outside air intake valve. If a control room envelope isolation valve fails, Action "a" requires that valve to be restored to operable status within seven days, or the affected flow path to be isolated within the following six hours. Action "b" similarly requires the affected flow path to be isolated within six hours should an emergency outside air intake isolation valve become inoperable and cannot be restored within seven days.

Action "c" covers all other failures of the envelope. Under these conditions, one action statement stipulates that emergency breathing airbank pressure will be verified and that immediate actions be taken to restore the envelope to operable status should a toxic gas event occur. The present specification only requires the suspension of activities involving core alterations or positive reactivity changes when the ability to pressurize the envelope is lost and the plant is in Mode 5 or 6. The proposed version merely recognizes the threat of a toxic gas event and requires action to ensure that installed backup systems remain functional such that they are available should need arise. In Modes 1 through 4, the proposed version allows three days to identify the cause of a failure and

initiate corrective action. If the cause is identified, seven days (minus the time it took to identify the cause) are allowed to correct the failure and restore the ability to pressurize the control room envelope. Otherwise, a plant shutdown is required. Finally, all operations involving core alterations or positive reactivity changes are suspended for envelope failures occurring during Modes 5 and 6.

Surveillance requirements for control room isolation and pressurization are similar to the existing TS. The purpose of these is to verify the functions of pressurization and isolation. Three surveillances are in the proposed version. The first surveillance varies from the existing TS only in the addition of a new requirement. In the existing TS, pressurization of the control room is verified per 4.7.6 e.3.:

> "Each control room air conditioning system shall be demonstrated OPERABLE . . . at least once per 18 months by . . . verifying that the system maintains the control room at a positive pressure of greater than or equal to 1/8 inch water gauge relative to the outside atmosphere during system operation."

The proposed surveillance adds a specific make-up air flow rate for which the pressure differential is to be established. The proposed surveillance, 4.7.6.4 a. is as follows:

> "The control room envelope isolation and pressurization boundaries shall be demonstrated OPERABLE at least once per 18 months by . . . verifying that the control room envelope can be maintained at a positive pressure of greater than or equal to 1/8 inch water gauge relative to the outside atmosphere with a make-up air flowrate less than or equal to 200 cfm during system operation."

As pointed out previously, the existing TS does not include a limit for make-up air flow. Recent operational experience (i.e., LER 90-019-00 and Enforcement Action 91-06) has highlighted the fact that the system make-up air flow rate when in the high radiation mode of emergency operation has clear implications for system operability. As such, this limit is requested to be included in the TSs.

Another surveillance, taken verbatim from the existing specification, requires verification of isolation on receipt of a toxic gas signal (4.7.6.4 b). The protection offered by this surveillance remains unchanged. The final surveillance (4.7.6.4 c), requiring verification of normal outside air flow path isolation following a safety injection actuation test signal, is only changed to reflect verification of the function about which this TS is concerned (i.e., isolation). The existing surveillance requires verification that the system automatically switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks on the test signal. Since the existing requirement is retained, word for word, in proposed surveillance 4.7.6.1 d.2. (which address the filtration function of that specification), protection of the surveillance is not compromised.

The proposed change includes a means of performing routine maintenance on the envelope and provides an opportunity to perform modifications that necessarily involve breaches in the envelope. Continued, reliable, safe plant operation demands regular maintenance and installation of equipment upgrades. However, the control room envelope is, essentially, a single component that must remain operable in all modes. Under present TSs, most maintenance actions or modifications involving an envelope breach must be performed with the plant in an action statement. The proposed specification provides a seven day window for maintenance and modification in proposed Action 3.7.6.4 c.3. The intent of this

action statement is to recognize distinct differences between two envelope breaches that might otherwise appear identical. It serves to emphasize the importance of identifying the exact cause of a failure while recognizing that when the cause of the failure is positively known, even simple temporary actions, when combined with inherent design conservativisms, can effectively protect control room personnel. On the other hand, the continued existence of an envelope breach that is not identified can clearly result in unsatisfactory emergency performance. Therefore, plant operation is not allowed to continue when reasonable efforts have failed to identify the cause of the failure.

The request for a seven day maintenance window is based on an analysis of the maintenance tasks for those systems needed to maintain the envelope at a positive pressure. In brief, the analysis concluded that to conduct non-emergency system level maintenance would require four days. The remaining three days are included to allow for complications and other unforseen events. This, however, does not imply that safe plant operation could be subordinate to the desirability of a seven day maintenance opportunity. As such, Action 3.7.6.4 c.2. is included to require that the operators immediately restore the integrity of the control room envelope on the occurrence of a toxic gas event.

The proposed specification also provides a significant increase in operational flexibility. Under the present TS, any failure that results in the inability to pressurize the control room envelope requires entry into TS 3.0.3 and the initiation of unit shutdown. The proposed version allows plant personnel a total of seventy-two hours to identify the specific cause of the failure and initiate corrective action. To identify a reasonable period for an allowable outage, potential failures that affect the ability to pressurize the control room envelope were reviewed. If maintenance personnel work around the clock, analysis indicates that three days are required for correction of the range of creditable failures.

Some conservatisms exist that support this proposed change. The control room habitability analyses assume the Waterford 3 control room envelope is surrounded by a cloud of toxic gas and that post-isolation in-leakage would occur directly from that cloud. In fact, the control room envelope is surrounded on three sides by the Reactor Auxiliaries Building (RAB) and on a fourth side the Turbine Building. Only two sides, neither of which has doors or other penetrations, are exposed to the outside atmosphere. Since the Turbine Building wall has only an air-lock door, the greatest percentage of in-leakage to the control room would be from the RAB because of the penetrations. The analysis revealed that toxic chemical concentrations in the control room are almost entirely from in-leakage after isolation. (This analysis had been reviewed by the Commission.) Furthermore, including the effect of the RAB in the analytical model, a reduction by at least an order of magnitude was realized in the chemical concentrations in the air leaking into the control room. In the final analysis, control room toxic chemical concentrations were found to build up at a rate slower than previously assumed. This should, for any credible breach in the envelope, provide operators with enough time to don breathing apparatus before being exposed to elevated levels of toxic chemical concentrations.

Still further conservativisms exist. Regulatory Guide 1.78, "Assumptions for Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release," paragraph C.13 states, in part:

"If consideration of the possible accident for any hazardous chemical indicates that the applicable toxicity limits may be exceeded, self-contained breathing apparatus of at least one-half hour capacity or a tank source of air with manifold outlets . . . should be provided for each operator in the control room. Additional air capacity with appropriate equipment should be provided if a chemical hazard can persist longer than one-half hour. For accidents of longer duration, sufficient air for six hours (coupled with provisions for obtaining additional air within this period) is sufficient."

These requirements have already been implemented at Waterford 3. Additional protection is also offered. For instance, any rise in concentration of a chemical sampled by the installed gas detection systems can be monitored at the plant monitoring computer. Also, Waterford 3 is a participant in the St. Charles Parish Emergency Preparedness/Industrial Hotline System and would be informed of any local industrial emergency by the St. Charles Parish Emergency Operations Center. Taking into account the Waterford 3 control room design characteristics, the industrial hotline, and the installed emergency breathing equipment combined with the limited time that the plant may continue to operate with an envelope breach, a prudent level of protection is provided for the plant operators to ensure the safe operation of Waterford 3.

Included in Attachment B is an amendment to the bases. This amendment reflects the proposed changes made to TS 3/4.7.6.

Safety Analysis:

The proposed changes 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 the operation of Waterford 3 in accordance with these proposed changes involve a significant increase in the probability or consequence of any accident previously evaluated?

   Response: No

   The limiting accidents against which the CRACS protects are:

   - all Chapter 15 scenarios involving a release of radiation to the environment outside the containment,
   - toxic gas releases, and
   - smoke resulting from control room envelope fires.

   Limiting accidents against which the emergency air filtration system protects are all Chapter 15 scenarios involving release of radiation to the environment outside the containment.

   The probability and consequences of any of the limiting accidents listed above are unchanged by the specialization of the plant TSs. As pointed out in the description of the change, TSs 3/4.7.6.1 and 3/4.7.6.2 have retained all requirements from the existing TS with the addition of one

action statement based on the inoperability of both trains, and the exception of one action statement based on one inoperable train in Modes 5 or 6. This action statement is unnecessary since it is only applicable in a mode unlikely to experience the limiting design basis accidents against which this system protects. Therefore, the protection of the original specification is uncompromised for the function of emergency air filtration.

There are two differences between the existing TS and the proposed TS 3/4.7.6.3 regarding control room air temperature. The first is the three hour outage allowed when both air conditioning units are inoperable. This is two hours more than the existing TS allows (in accordance with TS 3.0.3). However, a three hours period provides operators with sufficient time to realign the standby chiller. This corrects most types of failures. Although three hours are less restrictive than TS 3.0.3, it is not significantly less and therefore, does not seriously reduce the protection of the original specification. The other change is the reduction of the surveillance temperature from 110°F to 80°F. This is more restrictive than the existing version. All other requirements for air conditioning are retained in the proposed TS.

Proposed TS 3/4.7.6.4, which concerns control room isolation and pressurization, allows more limited continued plant operation than the existing TS. When compared to existing actions required for continued operation with a known breach, the proposed specification recognizes the potential consequences that could arise from operation with an unidentified breach in the envelope and imposes more restrictive actions.

Engineering analysis aiso shows that, for most of the time, toxic chemical concentrations in the control room envelope after a postulated release are largely the result of in-leakage from the RAB after isolation. This has the effect of reducing the chemical concentration of gas leaking into the control room by at least an order of magnitude and ultimately results in a control room chemical concentration buildup rate slower than previously assumed. These characteristics make it likely that the operators would have sufficient time to don the breathing apparatus installed in the control room. It is also noteworthy that this emergency breathing apparatus is considered by Regulatory Guide 1.78 to provide sufficient operator protection for those cases where chemical toxicity limits might be exceeded.

The limited continued operation allowed by the proposed change, the design characteristics of the control room, and the installed breathing apparatus provides a reasonable level of protection for plant personnel. Some new restrictions are identified for the control room isolation and pressurization. These were not previously identified and therefore offer enhanced protection to the TS. All existing requirements specific to the isolation and pressurization function are retained in the proposed version. As such, the proposed specification offers more protection than the existing TS.

Based on the above, these revisions to the TS will not adversely affect the reliability or performance of any installed equipment. There are no design changes associated with this proposed amendment. Consequently, all aspects of the safety analysis will remain unchanged and there will be no physical change to the facility, and operation of Waterford 3 in accordance with these proposed changes will not involve a significant increase in the probability or consequence of any accident previously evaluated.

2. Will the operation of Waterford 3 in accordance with these proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

To create a new or different kind of accident, these changes must introduce a new failure path. In this regard, these revisions are benign since they do not alter the system or its operation. With a few exceptions, all existing TS restrictions have been retained. The exceptions have bee shown to have insignificant impact. Furthermore, several additional restrictions, not in the existing specification, have been added.

Based on the above information, these changes do not introduce a new failure path and therefore, cannot create a new, unevaluated sequence of events. The current plant safety analyses are bounding and this revision will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Will the operation of Waterford 3 in accordance with these proposed changes involve a significant reduction in the margin of safety?

Response: No

Safety margins related to the control room envelope air systems are established for control room temperature and the habitability of the control room following all credible accidents. This change does not modify the equipment installed in the plant or its operation. Therefore, existing margins of safety are retained, and the operation of Waterford 3 in accordance with this 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 that significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.