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Director  
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Waterford 3

**W3F1-95-0027**

**A4.05**

**PR**

March 3, 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  
Request Additional Information Regarding  
Technical Specification Change Request NPF-38-148

Gentlemen:

By letter dated December 14, 1993, Waterford 3 proposed Technical Specification (TS) Change Request NPF-38-148. The proposed change included revised Reactor Coolant System (RCS) pressure-temperature (PT) curves. The present PT curves, TS Figures 3.4-2 and 3.4-3, have a valid life span of 0 to 8 Effective Full Power Years (EFPY). The revised curves proposed PT limits for 0 to 20 EFPY. The revised curves were based on ABB Combustion Engineering (CE) Report C-MECH-ER-021, Rev.00, that was included with the initial request, and B&W Report BAW-2177 (Analysis of Capsule W-97), submitted for NRC review in November of 1992.

By letter dated January 11, 1995, the NRC staff requested additional information concerning the methods for predicting fluence and the uncertainty associated with the measurements and calculations used in the fluence prediction. The neutron fluence results from BAW-2177 were used by ABB CE to develop RCS PT limits for 20 EFPY. The apparent concern is the projection of the fluence value and associated PT limits to 20 EFPY, based on the analysis results of one surveillance capsule.

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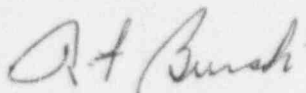
Request for Additional Information Regarding  
Technical Specification Change Request NPF-38-148  
W3F1-95-0027  
Page 2  
March 3, 1995

To resolve this issue, Waterford 3 requests that the proposed 20 EFPY on TS Figures 3.4-2 and 3.4-3 be modified to 15 EFPY. The proposed PT curves (excluding the title blocks) are otherwise unchanged by this request. The modified curves are still based on a 0-20 EFPY peak surface fluence of  $2.29 \times 10^{19}$  n/cm<sup>2</sup>. By reducing the proposed curve extension from 20 to 15 EFPY, adequate conservatism is incorporated to address the staff's concerns. This proposed change has no affect on the no significant hazards determination provided in the initial request. The modified PT curves, TS Figures 3.4-2 and 3.4-3, are attached for review.

As discussed with NRC staff, the current PT curves (0-8 EFPY) are expected to expire on May 11, 1995 (assuming continued operation at 100% power). Therefore, Waterford 3 respectfully requests an expeditious review.

If you have any questions associated with this request, please contact Mr. O.P. Pipkins at (504) 739-6707.

Very truly yours,



R.F. Burski  
Director  
Nuclear Safety

RFB/OPP/ssf

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