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W3F1-95-0066  
A4.05  
PR

May 12, 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  
Supplement To Technical Specification Change Request  
NPF-38-145

Gentlemen:

By letter dated November 16, 1993 Waterford 3 proposed the subject Technical Specification Change Request. This submittal supersedes our previous request in its entirety.

This proposed change modifies TS 3/4.6.1.2 by adopting the wording for primary containment integrated leak rate testing that is consistent with the requirements of the Combustion Engineering Improved Standard Technical Specifications (NUREG 1432).

The circumstances surrounding this change do not meet the NRC's criteria for exigent or emergency review. However, this request is directly related to our 10CFR50 Appendix J, exemption request dated November 16, 1993. Due to the significant impact on our upcoming refueling outage, we respectfully request an expeditious review. The Waterford 3 refueling outage is currently scheduled to begin September 8, 1995.

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This proposed change has been evaluated in accordance with 10CFR50.91(a)(1) using criteria in 10CFR50.92(c) and it has been determined that the proposed change involves no significant hazards considerations. The Plant Operations Review and Safety Review Committees have reviewed and accepted the proposed change.

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/PLC/ssf

Attachment: Affidavit  
NPF-38-145

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

My Commission expires WITH LIFE

DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-38-145

The proposed change modifies the surveillance requirements of Technical Specification 3.6.1.2 for containment leakage by removing the specified scheduler criteria for Type A testing. In place of the specific requirements is a requirement to follow the source of this criteria that is 10 CFR 50, Appendix J.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Background

The TS currently require that a set of 3 containment integrated leak (Type A) tests be performed at 40 plus or minus 10 month intervals, during each 10-year service period, with the third test of each set performed during shutdown for the 10-year plant inservice inspection. Appendix J to 10 CFR 50 requires that a Type A test of the containment be performed periodically. These tests are required to be scheduled as a set of three tests to be performed at approximately equal intervals during each 10-year service period with the third test to coincide with the shutdown for the 10-year plant inservice inspection. The TS containment leakage rate testing requirements essentially duplicate the requirements of Appendix J; additionally, the TS require the Type A test be performed at 40 plus or minus 10 month intervals. The TS requirement to conduct Type A test at 40 plus or minus 10 month intervals is too restrictive especially for licensees on 18 month fuel cycles. This results in additional licensee amendment applications such as Waterford 3's NPF-38-135 dated May 7, 1993 that resulted in TS Amendment 85. The improved standard technical specifications resolved this problem by removing detailed schedules from the TS and simply requiring compliance with 10 CFR 50, Appendix J, except as modified by approved exemptions. The proposed change proposes to delete the detailed surveillance schedule for the Type A tests and, instead, reference performance of Type A testing in accordance with 10 CFR 50, Appendix J.

This proposed change is similar to NRC approved changes for other licensee facilities e.g., D.C. Cook granted January 5, 1995, Duke Power granted March 9, 1995, Indian Point 2 granted March 17, 1995 and Brunswick Steam Electric Plant granted February 21, 1995.

#### Description

The proposed change modifies surveillance requirements associated with containment leakage TS 3.6.1.2 by removing scheduler requirement for Type A tests to be performed specifically at 40 plus or minus 10 month intervals and, instead, reference Type A testing in accordance with 10 CFR 50, Appendix J. The proposed change also includes several administrative changes.

TS 4.6.1.2 is reformatted and revised to state that "The containment leakage rates shall be demonstrated as follows." The requirement to perform containment leak rate testing using ANSI N45.4-1972 has been relocated to the Bases. This requirement is also duplicated in appendix J.

The Type A testing requirements previously specified in TS 4.6.1.2 (a), (b), and (c) are duplicated in Appendix J and, therefore, deleted and replaced with a requirement to perform Type A testing in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions.

The footnote identified by a single asterisk (applicable to Type B and C tests) no longer applies and is deleted. This is purely an administrative change.

The footnote identified by double asterisk is deleted. This footnote involved an approved exception (re; NRC Letter dated August 12, 1993) to 10 CFR 50, Appendix J, and will no longer be required under the proposed change.

#### 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 not affect the assumptions, design parameters, or results of any accident previously evaluated. The proposed change does not add or modify any existing equipment. The proposed Type A test schedule will continue to be consistent with 10 CFR 50 Appendix J. 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 does not involve modifications to any existing equipment. The proposed change will not affect the operation of the plant or the manner in which the plant is operated. 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 margin of safety for the containment barrier is, in part, preserved by compliance with 10 CFR 50 Appendix J. Although the proposed change will allow greater flexibility in meeting Appendix J requirements, the TS will continue to preserve compliance with 10 CFR Appendix J. 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.

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ATTACHMENT A