



**ENTERGY**

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W3F191-0823  
A.4.05  
QA

December 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-38-118  
Additional Information

Gentlemen:

On October 11, 1991, Entergy Operations, Incorporated submitted the subject request to change Waterford 3 Technical Specification Table 4.3-2, Engineered Safety Features Actuation System Instrumentation Surveillance Requirements. The requested changes extend the surveillance frequencies for the automated actuation logic for safety injection, containment spray, containment isolation, main steam line isolation, safety injection system recirculation and emergency feedwater from monthly to quarterly for the initiation relays and to semi-annually for the subgroup actuation relays. Changes are also requested for the footnotes to reflect these extended frequencies. In the interest of expediting the review of the request extending the surveillance period of the initiation relays, Entergy is requesting the NRC to review the subject submittal disregarding those changes associated with the subgroup relays and footnotes. These changes will be submitted for your review as a separate request.

As indicated in the original submittal, W3F1-91-0428, the extension of the surveillance for each of two relay types is based on a Combustion Engineering Users' Group (CEOG) analysis specific to the relay. The change extending the surveillance period for the "initiation" relays is based on information provided in CEN-327, "RPS/ESFAS Extended Test Interval Evaluation." This report has already been approved by the NRC. The report supporting the change for the other type of relays, CEN-403: "ESFAS Subgroup Test Interval Extension," is presently still under NRC review. As such, the review of this report is delaying the approval of a change request that, essentially, has already received approval

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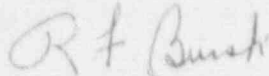
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by the commission. In the interest of expediting such an amendment, Entergy is asking the NRC to disregard these changes in the subject submittal associated with the subgroup relays and the footnotes and only review the request to extend the surveillance period of the initiation relays. If approved, an amendment may then be issued regardless of the review status of the unrelated CEOG topical report.

For convenience, please find a sample marked-up specification representing the extension to the surveillance period of the initiation relays, only. Please direct any questions or comments to Tim Gaudet on (504) 739-6666.

Very truly yours,



RFB/DAR/ssf

Attachment

cc:

R.D. Martin, NRC Region IV

D.L. Wigginton, NRC-NRR

R.B. McGehee

N.S. Reynolds

NRC Resident Inspectors Office

Administrator Radiation Protection Division (State of Louisiana)

American Nuclear Insurers

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ATTACHMENT