

Entergy Operations, Inc.
P.O. Box B
Kilbuck, LA 70066-0751
Tel 504 739 6661

Ross P. Barkhurst
Vice President, Operations
Waterford 3

W3F1-96-0006
A4.05
PR

February 6, 1996

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-38-176

Gentlemen:

The attached description and safety analysis supports a change to the Waterford 3 Technical Specifications (TS). The proposed change is necessary to correct several inconsistencies and is purely administrative in nature.

The 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 based on the evaluation mentioned above.

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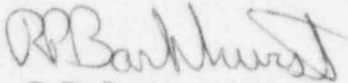
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Technical Specification Change Request NPF-38-176
W3F1-96-0006
Page 2
February 6, 1996

Waterford 3 requests that the implementation date for this change be within 60 days of NRC issuance of the amendment to allow for distribution and procedural revisions necessary to implement this 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-38-176

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

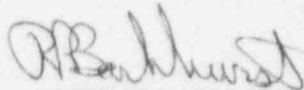
In the matter of)

Entergy Operations, Incorporated)
Waterford 3 Steam Electric Station)

Docket No. 50-382

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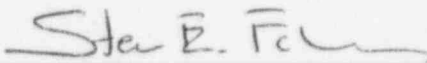
R.P. Barkhurst, being duly sworn, hereby deposes and says that he is Vice President Operations - Waterford 3 of Entergy Operations, Incorporated; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request NPF-38-176; that he 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 6TH day of FEBRUARY, 1996.



Notary Public

My Commission expires WITH LIFE

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGE NPF-38-176

This proposed change modifies the TS to correct several inconsistencies. The proposed change will amend the Allowable Values of parameters in Table 3.3-4 to be consistent with the identical parameters in Table 2.2-1 as approved in Amendment 113. The proposed change will add Mode 4 to the surveillance requirements of Table 4.3-2 Item 5.c (Safety Injection System Automatic Actuation Logic) that was inadvertently removed. Finally, the proposed change removes a reference to TS 3.3.3.2 in Surveillance Requirements TS 4.10.2.2 and 4.10.4.2. TS 3.3.3.2 Incore Detectors has since been removed from the TS. These proposed changes are purely administrative in nature.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Description

By letter dated December 9, 1994, Waterford 3 proposed a change, that in part, modified the TS by revising several Allowable Values for parameters identified on Table 2.2-1 "Reactor Protective Instrumentation Trip Setpoint Limits." These values were reviewed, approved and issued as part of License Amendment 113. The proposed change failed to identify the duplicate parameters and values appearing on Table 3.3-4 "Engineered Safety Features Actuation System Instrumentation Trip Values" such that the TS is now in conflict. On Table 3.3-4 the Allowable Values for the following parameters are modified to be consistent with Table 2.2-1:

	Old Value	New Value
Containment Pressure - High	≤ 17.3 psia	≤ 17.4 psia
Pressurizer Pressure - Low	≥ 1644 psia	≥ 1649.7 psia
Steam Generator Pressure - Low	≥ 748 psia	≥ 749.9 psia
Steam Generator Level - Low	$\geq 26.7\%$	$\geq 26.48\%$

This error was discovered as a result of the Waterford 3 Corrective Action Program. Administrative controls are currently in effect that implement the more conservative of the two values.

License Amendment No. 107 modified the TS by removing the Incore Detection System Requirements specified in TS 3.3.3.2. Surveillance Requirements TS 4.10.2.2 and TS 4.10.4.2 of section 3/4.10 Special Test Exceptions, makes reference to the Incore Detection System and TS 3.3.3.2. The reference to the Incore Detection System is appropriate and retained. The proposed change deletes reference to 3.3.3.2.

By letter dated December 18, 1991 Waterford 3 proposed a change to extend the surveillance interval for the Engineered Safety Features Actuation System (ESFAS) initiation relays. The proposed change inappropriately deleted Mode 4 from the specified surveillance requirements of TS Table 4.3-2 Item 5.c (which is also inconsistent with TS Table 3.3-3 that continues to specify Mode 4 applicability). This change was never intended to change the applicable Mode requirement. The proposed change was approved by Amendment 78. Waterford 3 has continued to ensure that the surveillance requirements for Table 4.3-2 Item 5.c are met prior to entry into Mode 4. This proposed change adds Mode 4 to TS Table 4.3-2 Item 5.c.

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 changes described herein are administrative changes necessary to correct administrative errors. The proposed changes will have no affect on any design basis accidents nor will these changes affect any material condition of the plant. Therefore, the proposed changes 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 changes are purely administrative. There are no new system or design changes associated with this proposal. 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 change will have no impact on any protective boundary, safety limit, or margin to safety. The proposed change corrects inconsistencies in the TS and is purely administrative in nature. 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-38-176

ATTACHMENT A