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Waterford 3

W3F1-92-0476

A4.05

QA

February 9, 1993

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-38-131

Gentlemen:

Please find attached Technical Specification Change Request NPF-38-131. The proposed change would revise the applicability of Technical Specification Sections 3.0 and 4.0 in accordance with the recommendations of Generic Letter 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements."

Should you have any questions or comments on this matter, please feel free to contact T.W. Gates at (504) 739-6697.

Very truly yours,

R.P. Barkhurst
Vice President, Operations Waterford 3

RPB/TWG/ssf

Attachments: Affidavit
NPF-38-131

cc: J.L. Milhoan (NRC Region IV), D.L. Wigginton (NRC-NRR),
N.S. Reynolds, R.B. McGehee, NRC Resident Inspectors
Office, Administrator Radiation Protection Division (State
of Louisiana), American Nuclear Insurers

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

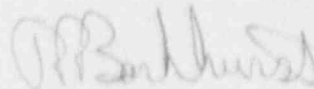
In the matter of

Entergy Operations, Incorporated
Waterford 3 Steam Electric Station

Docket No. 50-382

AFFIDAVIT

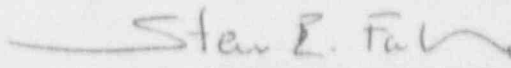
R.P. Barkhurst, being duly sworn, hereby deposes and says that he is Vice President Operations - Waterford 3 of Entergy Operations, Incorporated; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached Technical Specification Change Request NPF-38-131; that he 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 9TH day of FEBRUARY, 1993.



Notary Public

My Commission expires WITH LIFE.

DESCRIPTION AND SAFETY ANALYSIS
OF PROPOSED CHANGE NPF-38-131

This is a request to revise Technical Specification Sections 3.0 and 4.0, Limiting Conditions for Operation and Surveillance Requirements.

Existing Specifications

See Attachment A

Proposed Specifications

See Attachment B

Description

Generic Letter 87-09 dated June 4, 1987 encouraged licensee submittal of changes to Sections 3.0 and 4.0 of the Technical Specifications on the applicability of limiting conditions for operation and surveillance requirements. Specifically, the generic letter addressed three problems encountered in applying the criteria of Sections 3.0 and 4.0:

1. Specification 3.0.4 places unnecessary restrictions on mode changes and leads to inconsistent application of exceptions to its requirements,
2. When surveillance intervals are inadvertently exceeded, Specification 4.0.3 can lead to unnecessary shutdowns, and
3. Conflicts between Specifications 4.0.3 and 4.0.4 could prevent passage through or to operational modes as required to comply with Action requirements, or lead to plant shutdowns when an exception to Specification 4.0.4 is allowed but the appropriate Surveillance Requirements are not performed within the allowed surveillance interval.

In resolving these problems Generic Letter 87-09 provided acceptable changes to Technical Specifications 3.0.4, 4.0.3, and 4.0.4. The generic letter recommended changes have been adopted verbatim in the proposed changes of Attachment B with the single exception of the basis for Specification 4.0.2. In that particular case, the Waterford 3 Technical Specification is in accordance with the recommendations of NRC Generic Letter 89-14, incorporated as Amendment 62 to the operating license.

With respect to Technical Specification 3.0.4, Attachment 1 to Generic Letter 87-09 contains the following discussion:

"As a consequence of the modification described above to Specification 3.0.4, individual specifications with Action Requirements permitting continued operation no longer need to indicate that Specification 3.0.4 does not apply. They should be revised to delete the noted exception to avoid confusion about the applicability of Specification 3.0.4. However, exceptions to Specification 3.0.4 should not be deleted for individual specifications if a mode change would be precluded by Specification 3.0.4 as revised. For example, some specifications would not satisfy the provisions under which mode changes are permitted by the revision to Specification 3.0.4 and, therefore, the exception to Specification 3.0.4 need not be deleted. It is not the staff's intent that the revision of Specification 3.0.4 should result in more restrictive requirements for individual specifications."

The Waterford 3 Technical Specifications were reviewed to identify those specifications which contained an exception to Specification 3.0.4 whose Action Statement permitted continued operation of the plant for an unlimited period of time. In accordance with the guidance of Generic Letter 87-09 the exception to Specification 3.0.4 contained in the following Technical Specifications is proposed for deletion:

- 3.3.3.2 - Incore Detectors
- 3.3.3.3 - Seismic instrumentation
- 3.3.3.4 - Meteorological instrumentation
- 3.3.3.7.1 - Chlorine detection system
- 3.3.3.7.3 - Broad range gas detection
- 3.3.3.9 - Loose-part detection instrumentation
- 3.3.3.11 - Explosive Gas Monitoring System
- 3.4.9 - Structural integrity
- 3.7.9 - Sealed source contamination
- 3.9.7 - Crane travel - fuel handling building
- 3.9.9 - Containment purge valve isolation system
- 3.9.12 - Fuel handling building ventilation system
- 3.11.1.4 - Liquid holdup tanks
- 3.11.2.5 - Explosive gas mixture
- 3.11.2.6 - Gas storage tanks

Safety Analysis

Generic Letter 87-09 presents a detailed review of the safety significance of the proposed changes to Technical Specifications 3.0.4, 4.0.3 and 4.0.4. The staff has concluded that the changes as proposed are acceptable and do not require additional review. Therefore, no significant hazards consideration exists.

The proposed changes to delete exceptions to Specification 3.0.4, in Technical Specifications which allow continued operation of the plant for an unlimited period of time, are administrative changes directed by Generic Letter 87-09. The proposed change to Specification 3.0.4 is such that the deleted exceptions continue to apply.

Safety and Significant Hazards Determination

Based on the above Safety Analysis, it is concluded that: (1) the proposed changes do not constitute a significant hazards consideration as defined by 10CFR50.92; (2) there is a reasonable assurance that the health and safety of the public will not be endangered by the proposed changes; 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.