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W3F1-96-0176
A4.05
PR

October 16, 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-38-186

Gentlemen:

The attached description and safety analysis support the following changes to the Waterford 3 Technical Specifications: 1) relocate certain administrative controls to the Quality Assurance Program Manual (QAPM) as described in NRC Administrative Letter 95-06, "Relocation of Technical Administrative Controls related to Quality Assurance"; 2) change shift coverage from 8-hour day, 40-hour weeks to an option of 8 or 12 hour days and nominal 40-hour weeks; 3) make certain editorial changes to the titles of certain organizational positions.

The proposed changes have been evaluated in accordance with 10CFR50.91(a) (1) using criteria in 10CFR50.92 (c) and it has been determined that the changes involve no significant hazards considerations. The bases for these determinations are described in the attached submittal.

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Technical Specification Change Request NPF-38-186

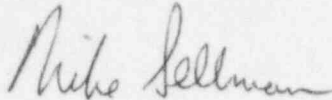
W3F1-96-0176

Page 2

October 16, 1996

Should you have any questions or comments concerning this request, please contact Mr. Jim Fisicaro at (504) 739-6242.

Very truly yours,



M.B. Sellman
Vice President, Operations
Waterford 3

MBS/ELL/ssf

Attachment: Affidavit
NPF-38-186

cc: L.J. Callan, NRC Region IV
C.P. Patel, NRC-NRR
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office
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Technical Specification Change Request NPF-38-186

W3F1-96-0176

Page 3

October 16, 1996

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bcc:	J.M. Hendrie (SRC Member)	
	Waterford 3 Records Center	(W-GSB-100)
	TSCR File (NPF-38-186)	
	Licensing Green Folder File	

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

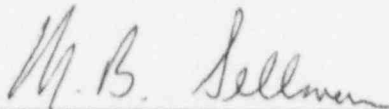
In the matter of)

Entergy Operations, Incorporated)
Waterford 3 Steam Electric Station)

Docket No. 50-382

AFFIDAVIT

M.B. Sellman, 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-38-186; 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.



M.B. Sellman
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 named above this 16TH day of OCTOBER, 1996.



Notary Public

My Commission expires WITH LIFE.

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGE NPF-38-186

The following is a request to change the Waterford 3 Technical Specifications Section 6.0 to relocate certain administrative controls to the Quality Assurance Program Manual (QAPM) as described in NRC Administrative Letter 95-06, "Relocation of Technical Administrative Controls related to Quality Assurance". The request also changes shift coverage from 8-hour day, 40-hour weeks to an option of 8 or 12 hour days and nominal 40-hour weeks. In addition it makes certain editorial changes to the titles of certain organizational positions. These changes will have no effect on the safe operation of Waterford 3.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Background

Section 6.0 of the Waterford 3 Technical Specifications describes the administrative controls to be implemented at the site. Part of these controls contains detailed descriptions of quality assurance program activities. Because of this level of detail and the frequent changes to organizational and administrative processes, numerous requests for technical specification changes have been submitted. In recognition of this burden, the NRC issued Administrative Letter 95-06, dated December 12, 1995, entitled "Relocation of Technical Specification Administrative Controls Related to Quality Assurance". The letter identifies that certain activities related to the independent safety engineering group, reviews and audits, procedure review process, and records and record retention may be moved from the Technical Specifications to the Quality Assurance program.

The Revised Standard Technical Specifications recognize that some plants have opted for 12-hour shifts and have provided language that allows the plant to choose either option.

Certain editorial changes are being made to bring the Technical Specifications into agreement with current organizational position titles or to delete title references where appropriate.

Description

This change proposes the following

- A. Relocates the below listed information from the Technical Specifications to the Quality Assurance Program Manual (QAPM) and replaces it with the words "Not Used".
 - a) 6.2.3 , Independent Technical Reviews
 - b) 6.8.2 and 6.8.3, requirements related to procedure reviews
 - c) 6.10, Record Retention
 - d) Page 21 is identified as "Nct Used"
- B. Revises the requirement for shift coverage in 6.2.2.e from 8-hour day, 40-hour weeks to an 8 or 12 hour day, nominal 40-hour weeks.
- C. Makes the following editorial changes:
 - a) Changes the title "shift supervisor" to "shift superintendent" in the following paragraphs: 6.1.1, Table 6.2-1, 6.2.4.1, 6.12.2
 - b) Reorders paragraphs 6.2.1.b and 6.2.1.c to follow the Standard Technical Specification format.
 - c) Revises paragraph 6.2.2.e.4 by deleting references to the Manager Technical Services, Manager Operations and Maintenance, and Operations Superintendent and replacing them with the term "or designee."
 - d) Changes the title "Operations Superintendent" to "Operations Manager" in paragraph 6.2.2.f.
 - e) Changes the title "Plant Manager" to "General Manager Plant Operations" in paragraphs 6.13.2.b and 6.14.2.b.

Discussion

- A) The proposed change removes the requirements for independent technical review function, procedure reviews, and record retention and relocates them to the QAPM. The location of these TS requirements is not necessary to assure the safe operation of Waterford 3 and the QAPM will provide sufficient controls for these activities. In addition, the QAPM is subject to the requirements of 10CFR50.54. Therefore, a change to the QAPM which reduces a commitment cannot be made without prior NRC approval.
- B) This proposed change allows operators to work 12-hour days and nominal 40-hour weeks. Waterford 3 polled approximately 20 other plants including River Bend, Donald C. Cook, Brunswick, McGuire, and Shearon Harris. The results indicated that 90% favored 12-hour shifts. In addition, 67% reported that absenteeism decreased, 77% reported that morale increased, and 55 % reported that personnel error decreased as a result of the change.

A Nuclear Regulatory Commission study of the 12-hour shift (NUREG/CR-4248) demonstrates that the advantages of going to the 12-hour shift outweigh the disadvantages. The primary advantages were greater job satisfaction, fewer errors, and better communication inherent in two shifts instead of three. Companies that implemented the 12-hour shift found an increase in employee morale and no decline in safety. These companies experienced greater productivity, fewer operator errors, and better communication. The biggest potential disadvantage was possible fatigue caused from working 12 hours in a day instead of 8.

While Waterford 3 implemented the change to a 12-hour shift in July 1991, the change was believed to be within the objective and scope of the Technical Specification requirement to maintain adequate shift coverage and limit the routine use of heavy overtime.

- C) These proposed changes are editorial in nature. Changing the order of sections 6.2.1.b and 6.2.1.c does not alter the content or intent of the sections. Deleting the references to the titles of the direct reports of the General Manager Plant Operations will reduce the burden of future Technical Specification changes whenever there are corresponding organizational changes. The changes to the titles General Manager Plant Operations and Shift Superintendent makes these sections agree with the current Waterford 3 organization.

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 conditions as they exist in the present Technical Specifications do not have an effect on either the probability or consequences of a previously evaluated accident. These changes also will have no impact to increase either the probability or consequences of a previously evaluated accident.

The proposed changes will have no effect on design basis accidents nor will the change directly affect any material condition of the plant that could directly contribute to causing or mitigating the effects of an accident.

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 will not alter the operation of the plant or the manner in which it is operated. The changes do not involve a design change and do not introduce any new failure modes.

Therefore, the proposed changes 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 margin of safety?

Response: No

The proposed changes are administrative in nature and affect only Section 6.0 of the Technical Specifications. The Waterford 3 margins of safety are defined in Sections 2 through 5 and are unaffected by these changes. Moving the reviews from the TS to the QAPM will have no affect on the margin of safety because reviews will still be performed. The only difference is the reviews will be administratively controlled by the QAPM. The QAPM is controlled by 10CFR50.54 so no changes can be made which would lessen these commitments (i.e., remove or reduce the requirement for procedure reviews) without prior NRC approval.

Changing from an 8 hour to an 8 or 12 hour shift will not have an adverse impact on personnel performance. The NRC study documented in NUREG CR-4248 has identified that personnel errors have decreased and productivity has increased where this change has been implemented.

Therefore, the proposed changes will not involve a significant reduction in a margin of safety.

Safety and Significant Hazard's 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.