



ENTERGY

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Mike Sellman
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Waterford 3

W3F1-96-0168
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-38-182

Gentlemen:

The attached description and safety analysis support a change to the Waterford 3 Technical Specifications. This submittal requests a change to Technical Specification Surveillance Requirement 4.6.1.2.a. The purpose of this Technical Specification Change Request is to permit the use of 10CFR50 Appendix J, Option B, Performance-Based Containment Leakage Testing. Additionally, a change to the Technical Specification Basis 3/4.6.1.2 has been included to support this change and make one minor editorial change.

This proposed change has been evaluated in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c), and it has been determined that this request involves no significant hazards consideration.

On May 4, 1993, at the annual Regulatory Information Conference, Dr. Murley announced a pilot program, Cost Beneficial Licensing Action Initiative (CBLA), established by NRR to give special consideration to licensee requests for changes requiring staff review that involve high cost and low safety benefit. In response to Dr. Murley's initiative, Entergy Operations met with NRR staff on June 8, 1993 to present an initial list of CBLAs. This proposed change can be categorized as a change meeting that criteria. Additionally, these changes are modeled after the containment testing specified in NUREG 1432, "Standard Technical Specifications - Combustion

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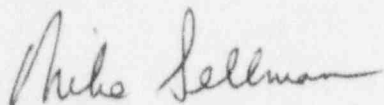
Engineering Plants." Format changes have been made to be consistent with the current Waterford 3 Technical Specifications.

The circumstances surrounding this change do not meet the NRC's criteria for exigent or emergency review. However, 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 April 11, 1997. Entergy Operations requests the effective date for this change be within 60 days of approval.

Waterford 3 currently has an exemption to delay performance of the Type A test until April 1997 or completion of Refueling Outage 8, whichever comes first. This exemption was granted by the NRC Staff by letter dated August 3, 1995. The proposed change will implement 10CFR50 Appendix J, Option B.

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

Very truly yours,



M.B. Sellman
Vice President, Operations
Waterford 3

MBS/CWT/ssf

Attachment: Affidavit
NPF-38-182

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

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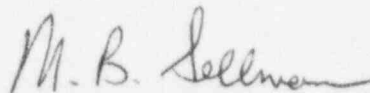
Entergy Operations, Incorporated
Waterford 3 Steam Electric Station

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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-38-182; 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. Seilman
Vice President Operations - Waterford 3

STATE OF LOUISIANA

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PARISH OF ST. CHARLES

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Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 16TH day of OCTOBER, 1996.



Notary Public

My Commission expires WITH LIFE.

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGE NPF-38-182

The proposed change requests a change to Technical Specification Surveillance Requirement 4.6.1.2.a for containment leakage to permit the use of 10CFR50 Appendix J, Option B, Performance-Based Containment Leakage Testing. A change to the Basis 3/4.6.1.2 is submitted to support this change and provide an editorial change.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Background

Appendix J to 10CFR50 requires that a Type A test of 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 ten year service period with the third test to coincide with the shutdown for the ten year plant inservice inspection. The Technical Specification essentially duplicates the requirements of Appendix J. The proposed change would allow the use of Appendix J, Option B, which is conducting of the containment leakage tests at an interval based on performance.

The recent NRC conclusions on containment leak rate testing, as documented in NUREG-1493, "Performance-Based Containment Leakage-Test Program," are based on two fundamental components. First is the insight gained through probabilistic risk assessment techniques. This insight allows the NRC to better assess and apply the relative significance of systems important to safety. The second is the significant data base of practical experience regarding containment leakage rate testing gained since 1973, when Appendix J became effective. This operating and testing experience provides solid evidence of the need and activities necessary to conduct Appendix J testing and the cost of those activities both in resources and occupational radiation exposure.

The new risk-based regulation is based on the performance history of the containment as a means to justify an increase in the interval for Type A tests. The new regulation requires tests to be conducted on an interval based on the performance of the containment structure without specifying the interval in the regulation.

As discussed in Waterford 3's Letter W3F1-93-0098, dated November 16, 1993, Waterford 3 has a low leakage containment and that leakage has never exceeded 24.6% of L_a . There are no mechanisms which would adversely affect the structural capability of the containment and that would be a factor in extending the Type A test schedule. A risk impact assessment was performed, and a determination was made that there is no risk impact as a result of changing the Type A test schedule.

Reducing the Type A test frequency from the current three tests every ten years to performance based frequency as documented in NUREG 1493 leads to no significant increase in risk. The estimated increase in risk is insignificant because Type A tests identify only a few potential containment leakage paths that cannot otherwise be identified by Type B and C testing.

Furthermore, operating experience shows that leaks found by Type A tests have only marginally exceeded existing requirements. Given the insensitivity of risk to containment leakage rate and the small fraction of leakage paths detected solely by Type A testing, increasing the interval between Type A tests is possible with no significant impact on public risk.

This change is similar to NRC approved changes for other licensee facilities, e.g., North Anna granted February 9, 1996 (for type A testing), Sequoyah granted February 5, 1996 (for type A, B & C testing), R. E. Ginna granted February 13, 1996 (also includes conversion to improved standard Technical Specifications) and other facilities.

Description

The proposed changes would revise the Technical Specifications for Waterford 3. Specifically, the change would permit the use of 10CFR50 Appendix J, Option B, Performance-Based Containment Leakage Rate Testing.

The Nuclear Regulatory Commission has amended its regulations to provide a performance based option for leakage rate testing of containments. This testing option is available in lieu of compliance with the prescriptive requirements contained in Appendix J requirements. Therefore, Waterford 3 is proposing a change to the Technical Specifications to reference Option B to 10CFR50, Appendix J. This change will permit use of the performance-based surveillance testing, Option B, of 10CFR50 Appendix J.

Additionally, a change to the Technical Specification Basis 3/4.6.1.2 has been included to support this change and make one minor editorial change. The Basis change adds Option B to Appendix J and states that the periodicity for Type A testing is determined by the performance-based leakage-testing program. Where the Basis now specifies a specific procedure number, a change is being submitted to reference the "Technical Requirements Manual".

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 schedule will be consistent with 10CFR50 Appendix J, Option B. 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 10CFR50 Appendix J. Although the proposed change will allow greater flexibility in meeting Appendix J requirements, the proposed change will continue to preserve compliance with 10CFR50 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.