



ENTERGY

Entergy Operations, Inc.
P.O. Box 8
Killona, LA 70066-0751
Tel 504 739 6660

Mike Sellman
Vice President, Operations
Waterford 3

W3F1-96-0184
A4.05
PR

November 18, 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-38-184

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 4.4.8.3.1.b. The purpose of this Technical Specification Change Request is to change the testing requirement for the Shutdown Cooling System suction line relief valves to test in accordance with TS 4.0.5. Additionally, editorial changes have been made to 4.4.8.3.1 and 4.4.8.3.1.a.

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 meets the criteria for consideration as a CBLA. By changing this test interval, a cost savings of approximately \$20,000 can be realized each refueling outage.

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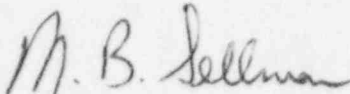
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The circumstances surrounding this change do not meet the NRC's criteria for exigent or emergency review. However, due to the significant impact on our upcoming refueling outage, we request an expeditious review. The Waterford 3 refueling outage is currently scheduled to begin April 25, 1997. Entergy Operations requests the effective date for this change be within 60 days of approval.

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-38-184

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

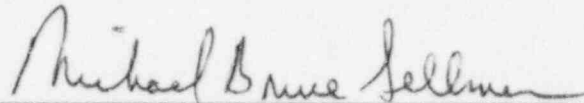
In the matter of)

Entergy Operations, Incorporated)
Waterford 3 Steam Electric Station)

Docket No. 50-382

AFFIDAVIT

Michael Bruce 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-38-184; 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.



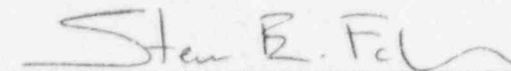
Michael Bruce Sellman
Vice President Operations - Waterford 3

STATE OF LOUISIANA)

) ss

PARISH OF ST. CHARLES)

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 18TH day of November, 1996.



Notary Public

My Commission expires WITH LIFE.

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGE NPF-38-184

The proposed change requests a change to Technical Specification Surveillance Requirement 4.4.8.3.1.b for the Shutdown Cooling System suction line relief valves to change the testing interval from every 30 months to test in accordance with TS 4.0.5. Additionally, editorial changes have been made to 4.4.8.3.1 and 4.4.8.3.1.a.

Existing Specification

See Attachment A

Proposed Specification

See Attachment B

Background

The proposed amendment is limited to changes to the surveillance testing requirement (bench testing) applicable to the Shutdown Cooling System suction line relief valves. The proposed amendment is consistent with accepted industry codes and regulatory guidance to provide assurance that the valves will function as designed. Previous experience with these valves have indicated that, when bench tested, they have been within the specified lift pressure of < 430 psia with two exceptions. In 1989, an incorrect setting occurred, which was caused by an incorrect maintenance procedure, not drift in the valve setpoint. This event was described in LER-90-006-00 by letter W3A90-0169, dated June 27, 1990. In 1994, one of the two valves was discovered to be set at 439 psia during "as found" testing and reset to the correct value. This represents only one failure due to drift in valve setpoint in eleven years of commercial operation.

Waterford 3 Technical Specifications currently require testing of each valve every 30 months. As Waterford 3 is on an 18 month fuel cycle, this requires testing of both valves during each refueling outage, in order not to exceed the test frequency. Changing the test frequency to test in accordance with TS 4.0.5 will allow testing of one valve each refueling outage, by applying a staggered test basis. By changing this test interval, a cost savings of approximately \$20,000 can be realized each refueling outage.

Description

The proposed changes would revise the Technical Specifications for Waterford 3. Specifically, the change would permit the use of a surveillance frequency interval consistent with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g). The current testing

interval of 30 months is being replaced with the interval specified by the applicable ASME code referenced in TS 4.0.5. This would allow testing of one valve each refueling outage instead of both valves every refueling outage.

NUREG 1432, "Standard Technical Specifications - Combustion Engineering Plants," uses Surveillance Requirements of "[18] months" for power operated relief valves or "In Accordance with the Inservice Testing Program" for mechanically actuated relief valves. Mechanically actuated relief valves rather than power operated relief valves are used for the Shutdown Cooling System suction line relief valves at Waterford 3. Therefore, a test frequency consistent with the ASME code is more appropriate for these valves. This change would make testing of the Shutdown Cooling System suction line relief valves consistent with requirements for other relief valves in the Inservice Test Program, which are tested pursuant to Technical Specification 4.0.5 (pursuant to Section XI of the ASME Boiler and Pressure Vessel Code). These include existing Technical Specification Surveillance Requirements 4.4.2.1 and 4.4.2.2 for the pressurizer code safety valves and 4.7.1.1 for the main steam line code safety valves.

Additionally, editorial changes are requested for Surveillance Requirements 4.4.8.3.1 and 4.4.8.3.1.a to allow the revised Surveillance Requirement to be consistent with the wording in NUREG 1432 and still maintain the format of Waterford 3's current Technical Specifications.

This changes 4.4.8.3.1 as follows:

From "Each SDC System suction line relief valve shall be demonstrated OPERABLE:"

To "For each SDC System suction line relief valve:"

This changes 4.4.8.3.1.a as follows:

From "by verifying in the control room at least once per 12 hours that each valve in the suction path between the RCS and the SDC relief valve is open."

To "verify in the control room at least once per 12 hours that each valve in the suction path between the RCS and the SDC relief valve is open."

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 change will not diminish the ability of the valves to perform as required during an accident. The proposed Shutdown Cooling System suction line relief valves testing schedule will be in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g). This ensures the operational readiness of the valves. Therefore, the proposed change will not involve an 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. No new failure modes that have not been previously considered will be introduced. The net effect of the change is to allow the plant staff the option of reducing the frequency of valve testing to a level that has been acknowledged as acceptable by the applicable ASME Code. 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 does not involve a decrease in the number or capacity of the valves in the system, nor does it involve a change in the relief valve setpoints, operability requirements, or limiting conditions for operation. The margin of safety for the relief valves is, in part, preserved by compliance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g). Although the proposed change will allow a slightly longer testing frequency, the proposed change will continue to preserve compliance with 10 CFR 50, Section 50.55a(g). Therefore, the proposed change will not involve a reduction in a margin of safety.

The proposed change does not involve a decrease in the number or capacity of the valves in the system, nor does it involve a change in the relief valve setpoints, operability requirements, or limiting conditions for operation. The margin of safety for the relief valves is, in part, preserved by compliance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g). Although the proposed change will allow a slightly longer testing frequency, the proposed change will continue to preserve compliance with 10 CFR 50, Section 50.55a(g). 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.