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Charles M. Dugger  
Vice President, Operations  
Waterford 3

W3F1-99-0187  
A4.05  
PR

January 6, 2000

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-38-218 Revision 1  
Extend Pressure Temperature Curve to 16 EFPY

Gentlemen:

Based on discussions with the NRC Staff, Entergy is requesting a revision to Technical Specification Change Request (TSCR) NPF-38-218, Reactor Coolant System Pressure Temperature (PT) Curves, submitted by Letter W3F1-99-0087 dated July 15, 1999. This request will change the time extension from the original requested value of 20 Effective Full Power Years (EFPY) to 16 EFPY. It was also concluded in discussions with the NRC Staff that the analysis information contained in the July 15, 1999, submittal bounds this 1 EFPY extension request of the present Technical Specification PT Curves (0-15 EFPY). Therefore, no additional analysis information is provided with this request.

Included in this revision are Attachment A (Existing Specifications), Attachment B (Proposed Marked-Up Specifications), and Attachment C (Proposed Specifications). Please replace the previously submitted attachments with the included attachments.

Entergy has projected the allowance of this extension to the PT Curves will insure adequate time for the removal of a surveillance capsule during Refueling Outage 11 in 2002. It will also provide adequate time for the testing and evaluation of the capsule to be completed and a TSCR to be prepared and submitted to the NRC Staff for approval such that the extended PT Curve limits (0-16 EFPY) will not be exceeded assuming

ADD1

PDR ADD1 0500382

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**100% power operation. The projection includes a minimum of 12 months for NRC Staff review of the submittal based on the results of the new surveillance capsule.**

**Entergy has concluded this change is bounded by the No Significant Hazards Consideration Determination in the July 15, 1999 license amendment request; therefore, it remains applicable.**

**This submittal does not contain any commitments.**

**Should you have any questions or comments concerning this request, please contact Arthur E. Wemett at (504) 739-6692.**

**Very truly yours,**



**C.M. Dugger  
Vice President, Operations  
Waterford 3**

**CMD/CED/rtk**

**Attachments: Affidavit  
NPF-38-218 Revision 1**

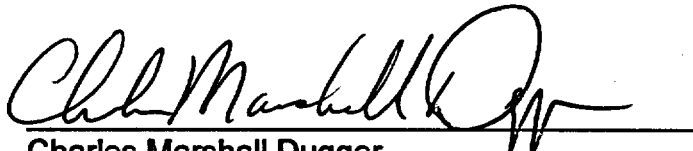
**cc: E.W. Merschoff, NRC Region IV  
C.P. Patel, NRC-NRR  
J. Smith  
N.S. Reynolds  
NRC Resident Inspectors Office  
Louisiana DEQ/Surveillance Division  
American Nuclear Insurers**

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the matter of )  
 )  
Entergy Operations, Incorporated ) Docket No. 50-382  
Waterford 3 Steam Electric Station )

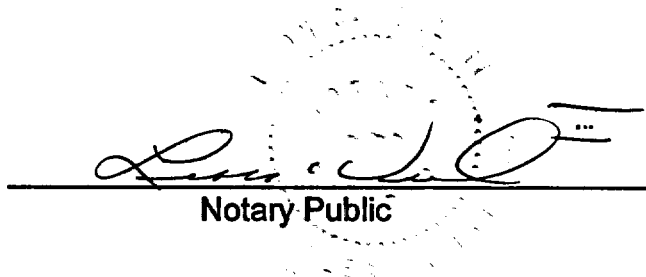
AFFIDAVIT

Charles Marshall Dugger, 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-38-218 Revision 1; 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.

  
Charles Marshall Dugger  
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 6<sup>th</sup> day of January, 2000.

  
Notary Public

My Commission expires d death.

**NPF-38-218 REVISION 1**

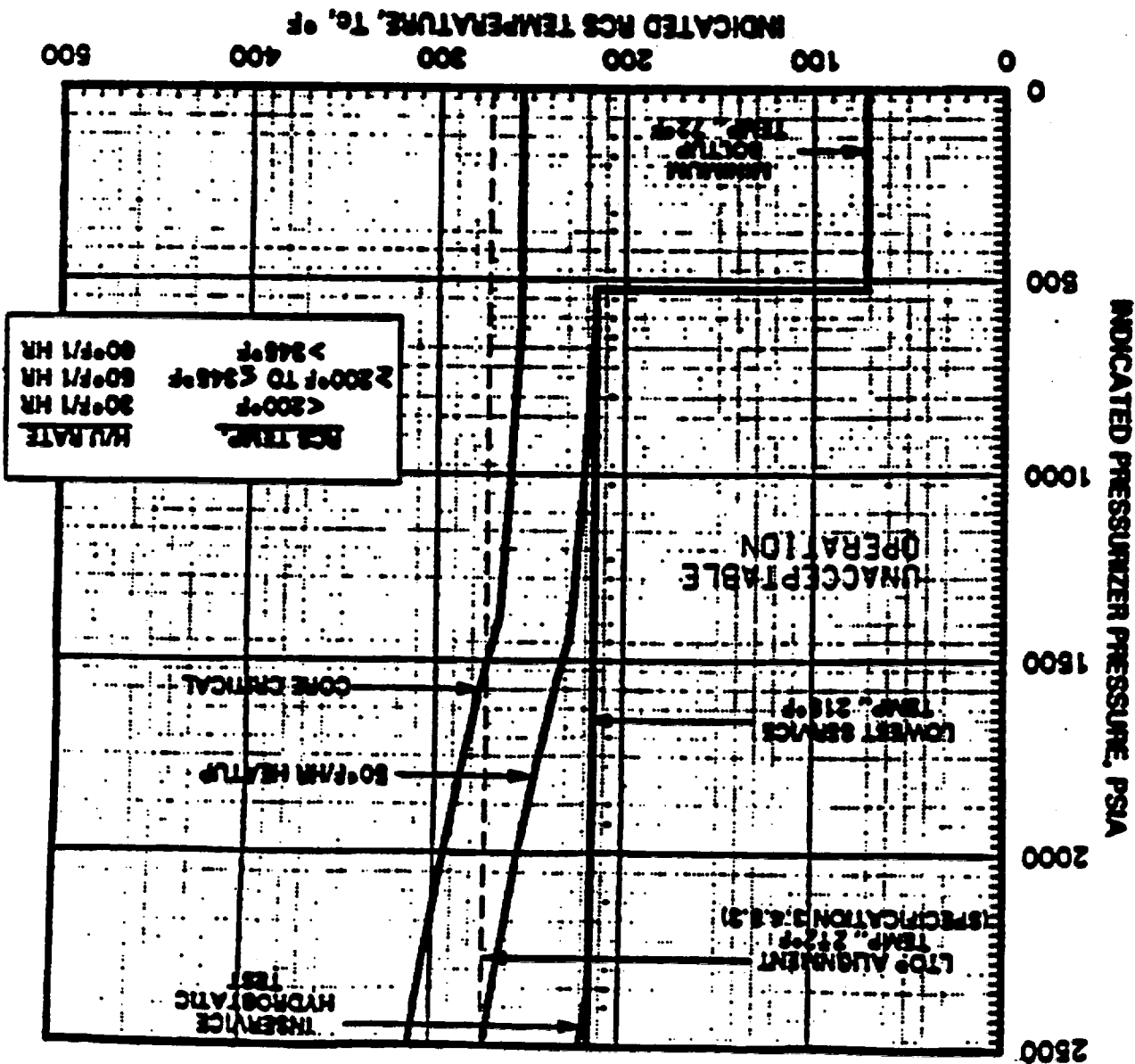
**ATTACHMENT A**

**EXISTING SPECIFICATIONS**

CURVE BASIS: PEAK SURFACE FLUENCE =  $2.29 \times 10^{19}$  n/cm<sup>2</sup> @ 20 EFPY  
0-15 EFPY

WATERFORD UNIT 3 HEATUP CURVE  
REACTOR COOLANT SYSTEM PRESSURE-TEMPERATURE LIMITS

FIGURE 3.4-2



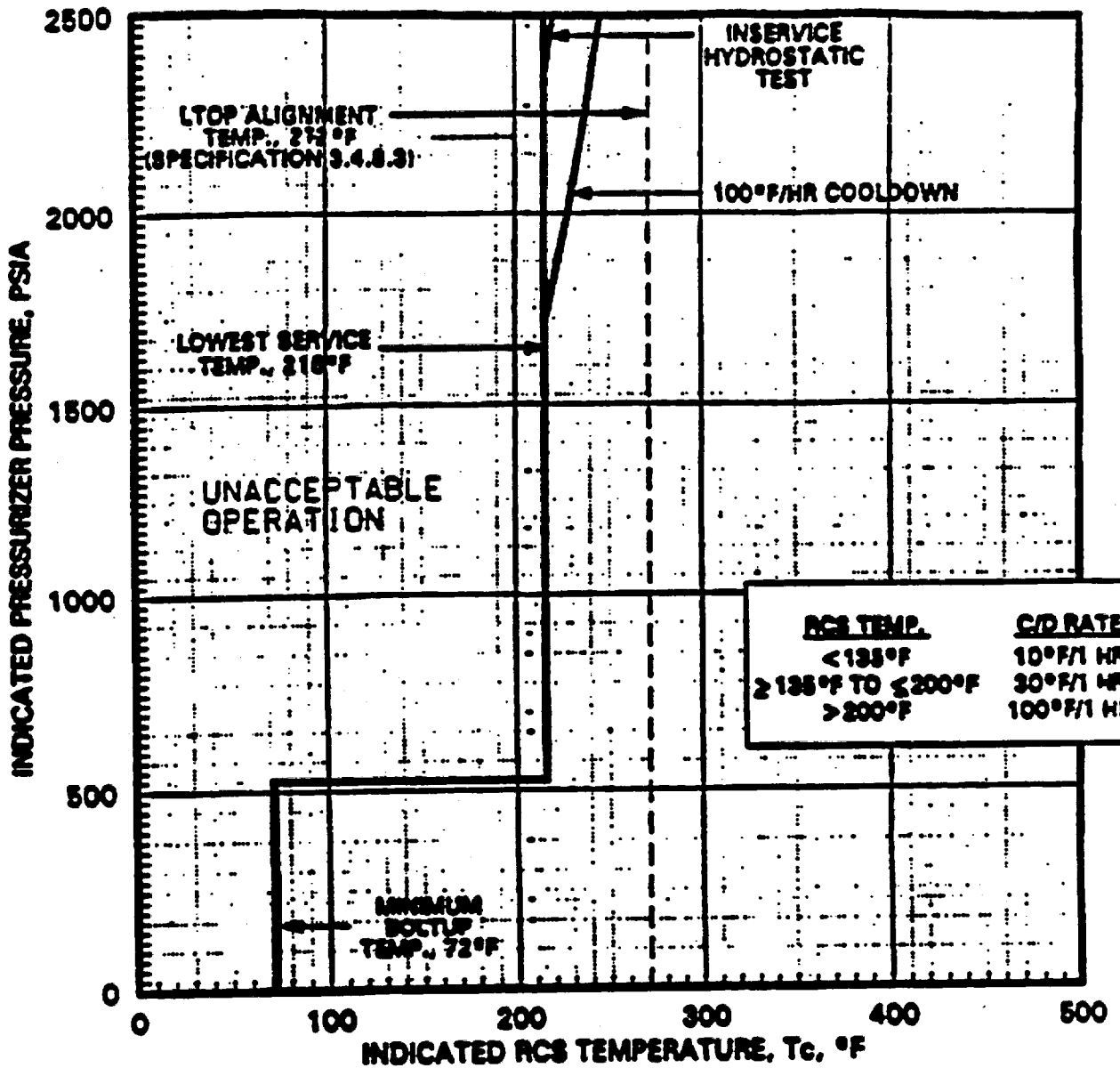


FIGURE 3.4-3

WATERFORD UNIT 3 COOLDOWN CURVE  
 REACTOR COOLANT SYSTEM PRESSURE-TEMPERATURE LIMITS  
 0-15 EFPY

CURVE BASIS: PEAK SURFACE FLUENCE =  $2.29 \times 10^{19}$  n/cm<sup>2</sup> @ 20 EFPY

**NPF-38-218 REVISION 1**

**ATTACHMENT B**

**PROPOSED MARKED-UP SPECIFICATIONS**

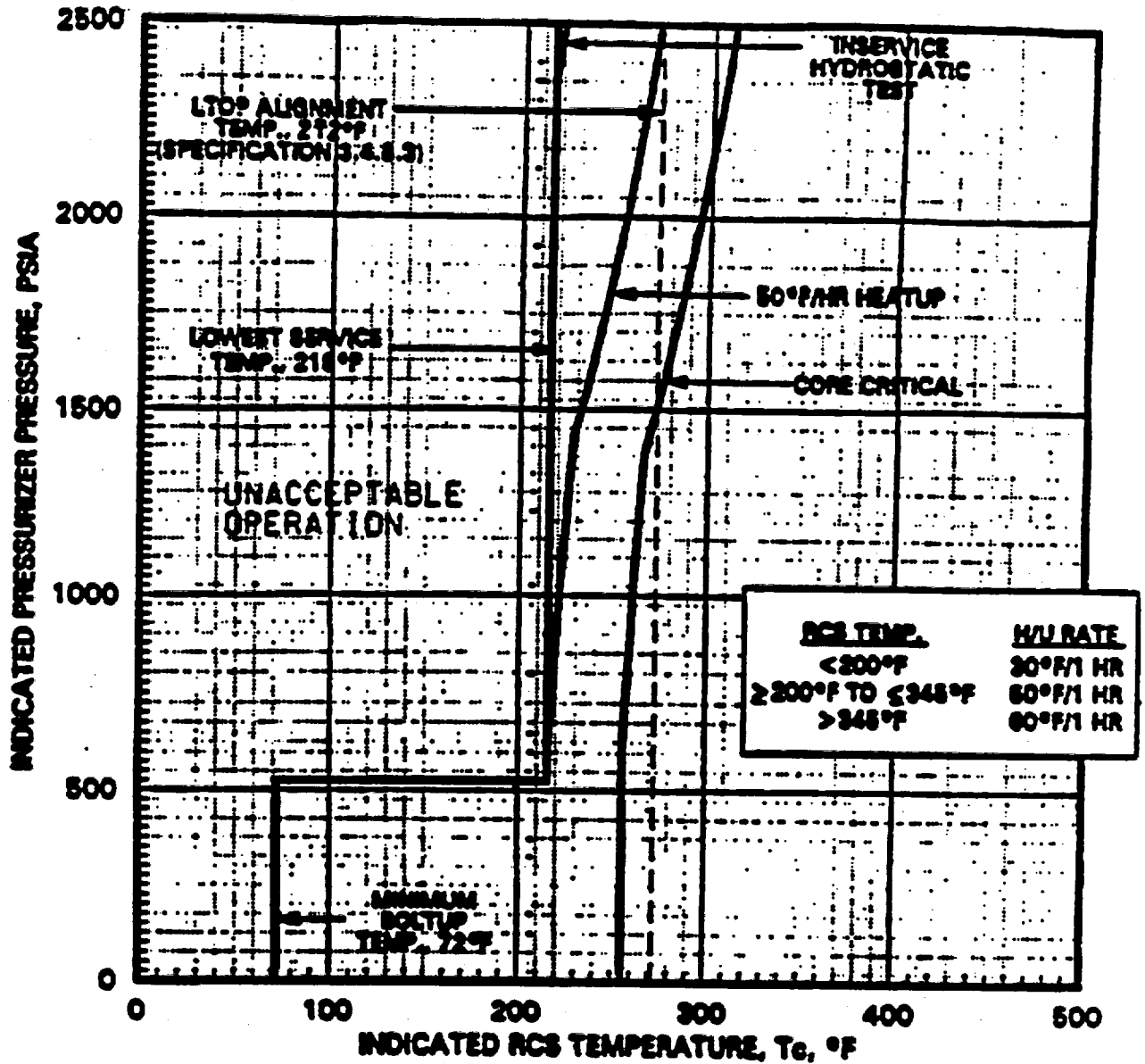


FIGURE 3.4-2

**WATERFORD UNIT 3 HEATUP CURVE  
REACTOR COOLANT SYSTEM PRESSURE-TEMPERATURE LIMITS**

0-15 EFY

CURVE BASIS: PEAK SURFACE FLUENCE =  $2.29 \times 10^{19}$  n/cm<sup>2</sup> @ 20 EFY

16



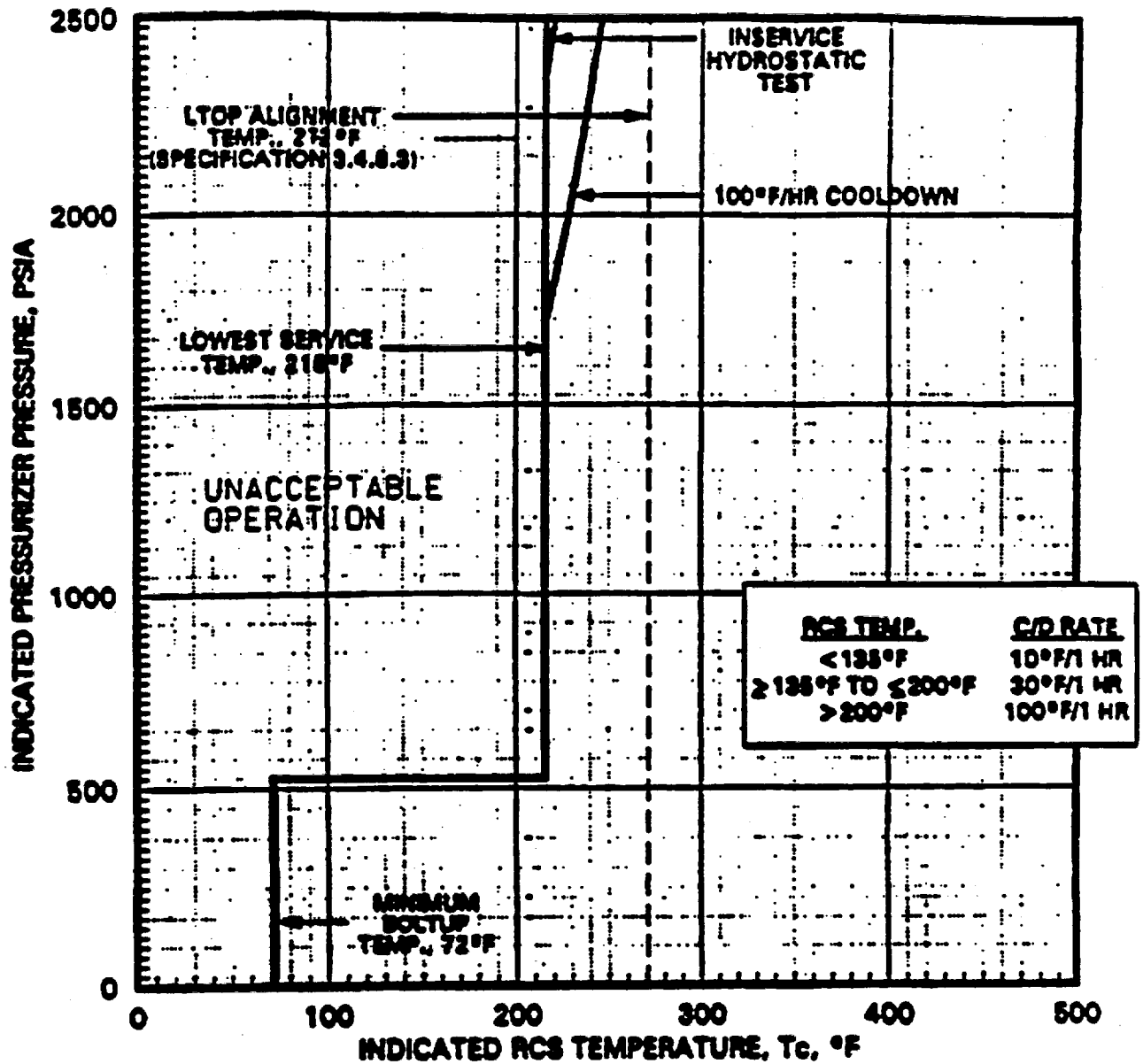


FIGURE 3.4-3

WATERFORD UNIT 3 COOLDOWN CURVE  
 REACTOR COOLANT SYSTEM PRESSURE-TEMPERATURE LIMITS

0-15 EFY

CURVE BASIS: PEAK SURFACE FLUENCE =  $2.29 \times 10^{19}$  n/cm<sup>2</sup> @ 20 EFY

16

**NPF-38-218 REVISION 1**

**ATTACHMENT C**

**PROPOSED SPECIFICATIONS**

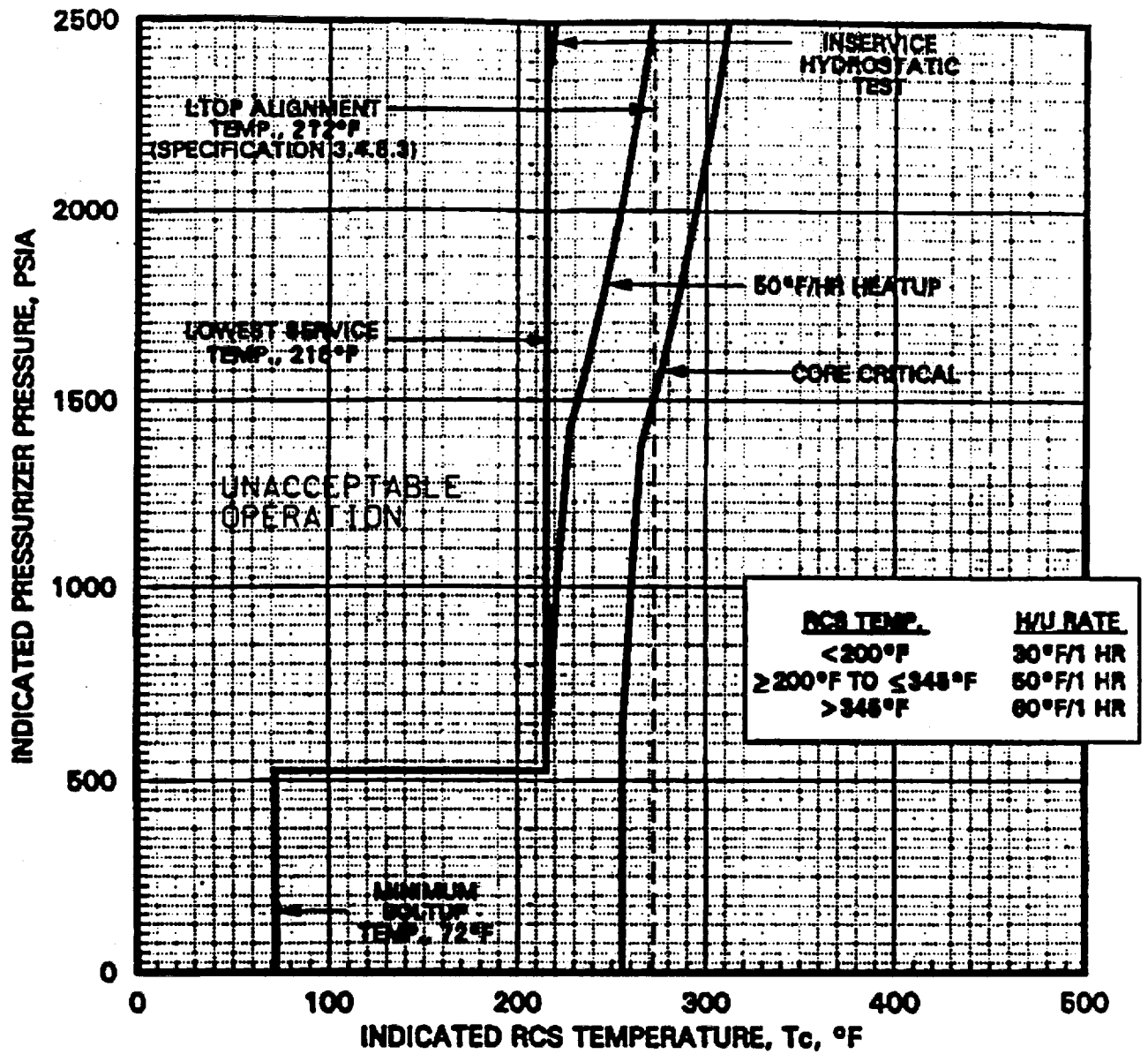


FIGURE 3.4-2

**WATERFORD UNIT 3 HEATUP CURVE  
REACTOR COOLANT SYSTEM PRESSURE-TEMPERATURE LIMITS**

0-16 EFY

CURVE BASIS: PEAK SURFACE FLUENCE =  $2.29 \times 10^{19}$  n/cm<sup>2</sup> @ 20 EFY

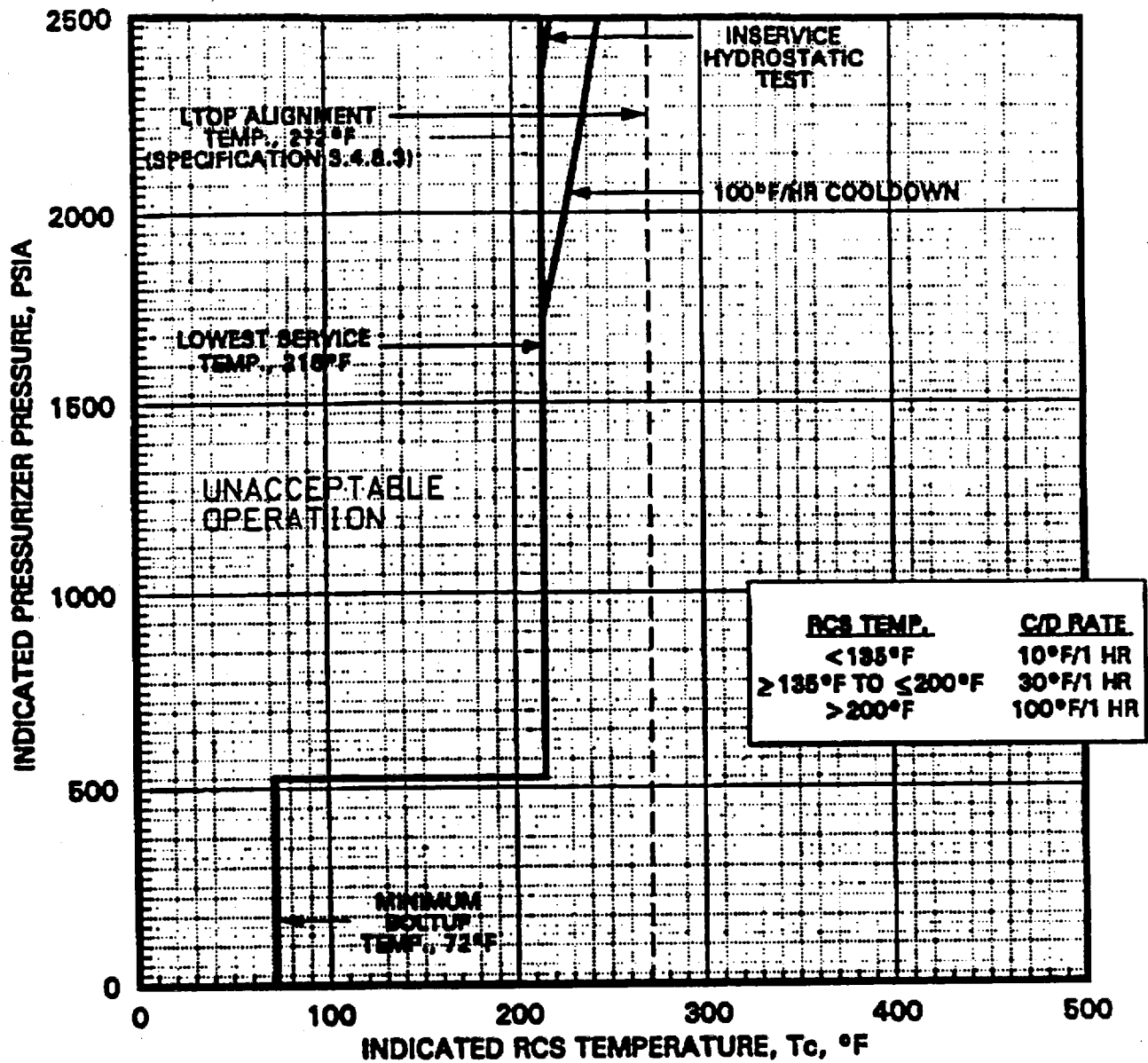


FIGURE 3.4-3

**WATERFORD UNIT 3 COOLDOWN CURVE  
REACTOR COOLANT SYSTEM PRESSURE-TEMPERATURE LIMITS**

0-16 EFPY

CURVE BASIS: PEAK SURFACE FLUENCE =  $2.29 \times 10^{19}$  n/cm<sup>2</sup> @ 20 EFPY