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Joseph E. Venable
Vice President, Operations
Waterford 3

WF31-2004-0019

March 9, 2004

Ms. Annette L. Vietti-Cook, Secretary
Office of the Secretary of the Commission
U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555

SUBJECT: Answer to Issuance of First Revised NRC Order (EA-03-009) Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors

Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

Dear Ms. Vietti-Cook,

In accordance with 10 C.F.R. § 2.202(a)(2), Entergy Operations, Inc. ("Entergy"), hereby submits for filing its answer to the February 20, 2004, First Revised NRC Order (EA-03-009) Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors and a related Certificate of Service in the captioned matter. Entergy does not request a hearing on the Order. Entergy consents to the Order modifying the license of Waterford Steam Electric Station, Unit 3 as delineated in Section IV thereof.

This letter contains no new commitments. If you have any questions or require additional information, please contact Bryan Miller at 504-739-6692.

Sincerely,

Joe Venable

JEV/DBM/cbh

A101
Rec'd 6/9/04

Attachments:

1. Licensee's Answer to February 20, 2004 First Revised Commission Order Modifying License Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors

2. Certificate of Service

cc: Mr. James E. Dyer, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Dennis C. Dambly
Assistant General Counsel for Materials Litigation and Enforcement
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Bruce S. Mallett, Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

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U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTACHMENT 1

W3F1-2004-0019

LICENSEE'S ANSWER TO FEBRUARY 20, 2004 FIRST REVISED COMMISSION ORDER MODIFYING LICENSE ESTABLISHING INTERIM INSPECTION REQUIREMENTS FOR REACTOR PRESSURE VESSEL HEADS AT PRESSURIZED WATER REACTORS

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Entergy Operations, Inc.	)	Docket No. 50-382
	)	License No. NPF-38
Waterford Steam Electric Station, Unit 3	)	

LICENSEE'S ANSWER TO FEBRUARY 20, 2004
FIRST REVISED COMMISSION ORDER MODIFYING LICENSE
ESTABLISHING INTERIM INSPECTION REQUIREMENTS
FOR REACTOR PRESSURE VESSEL HEADS AT
PRESSURIZED WATER REACTORS

On February 20, 2004, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an immediately effective order in the captioned matter entitled First Revised Order Modifying Licenses (Effective Immediately) ("Order") to, *inter alia,* Entergy Operations, Inc. ("Entergy"). This Order supercedes the original Order Modifying Licenses, which was issued on February 11, 2003. The Order stated that recent experience indicated that current inspection requirements in Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code ("ASME Code") and related NRC regulations do not provide adequate assurance that reactor coolant pressure boundary integrity will be maintained for all combinations of construction materials, operating conditions, and operating histories at pressurized water reactors ("PWRs"). The Commission stated that long-term resolution of reactor pressure vessel ("RPV") head penetration inspection requirements is expected to involve changes to the ASME Code and NRC regulations, specifically 10 C.F.R. § 50.55a. Consequently, the Commission stated that it was necessary to establish a minimum set of RPV head inspection requirements, as a supplement to existing inspection and other requirements in the ASME Code and NRC regulations, through the issuance of the Order. Therefore, the Commission imposed interim inspection requirements set forth in Section IV of the Order

pending the development of consensus standards and incorporation of revised inspection requirements into 10 C.F.R. § 50.55a, directly or through reference to a future version of the ASME Code.

Pursuant to 10 C.F.R. § 2.202(d), Entergy consents to the Order modifying the license as set forth in Section IV of the Order for performing inspections of the Waterford Steam Electric Station, Unit 3, reactor pressure vessel head. Entergy does not request a hearing on the Order. In accordance with Section IV.F of the Order, Entergy herein notifies the Commission that for Waterford Steam Electric Station, Unit 3, Entergy is unable to comply with the examination scope specified in Section IV.C(1)(b) due to the design of the nozzles (e.g. threaded nozzle lower ends). As directed in the Order, Entergy will submit a separate request to deviate from the requirements of the Order pursuant to the procedure specified in Section IV.F of the Order, describing the basis for the proposed alternative.

Footnote 1 of the Order cites an April 11, 2003, letter from R. Barrett, NRC, to A. Marion, Nuclear Energy Institute, for guidance to address flaw evaluation. In lieu of the cited guidance, Entergy intends to use the guidance in Electric Power Research Institute Report MRP-55, Revision 1, "Materials Reliability Program Crack Growth Rates for Evaluating Primary Water Stress Corrosion Cracking ("PWSCC") of Thick Wall Alloy 600 Material" (EPRI-TR-1006695), to evaluate PWSCC crack growth for the reactor vessel head penetration nozzle base metal comprising the inside surface and the portion of the outside surface protruding below the attachment J-groove weld.

I declare under penalty of perjury that the foregoing is true and correct. Executed on

March 9, 2004.

Respectfully submitted,
Entergy Operations, Inc.

J. E. Venable
Vice President, Operations
Waterford Steam Electric Station, Unit 3

ATTACHMENT 2

W3F1-2004-0019

CERTIFICATE OF SERVICE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Entergy Operations, Inc.	)	Docket No. 50-382
	)	License No. NPF-38
Waterford Steam Electric Station, Unit 3	)	

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that copies of the ANSWER TO FEBRUARY 20, 2004, FIRST REVISED COMMISSION ORDER MODIFYING LICENSE ESTABLISHING INTERIM INSPECTION REQUIREMENTS FOR REACTOR PRESSURE VESSEL HEADS AT PRESSURIZED WATER REACTORS in the captioned action have been served on the following by deposit in the United States mail, first class, and in addition, by overnight delivery (as indicated by an asterisk "*"), by facsimile, or by e-mail as directed in Section V of the Order (as indicated by a double asterisk "**"), this 9th day of March 2004.

Ms. Annette L. Vietti-Cook, Secretary**
Office of the Secretary of the Commission
U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and
Adjudications Staff
Washington, DC 20555-0001

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Vice President, Operations
Waterford Steam Electric Station, Unit 3