



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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ARLINGTON, TEXAS 76011-4005**

November 4, 2005

Joseph E. Venable
Vice President Operations
Waterford 3
Entergy Operations, Inc.
17265 River Road
Killona, LA 70066-0751

**SUBJECT: ASSESSMENT FOLLOWUP LETTER - WATERFORD 3 STEAM ELECTRIC
STATION**

Dear Mr. Venable:

On October 25, 2005, the NRC staff completed its review of the Waterford 3 Steam Electric Station performance indicators and inspection findings for the third quarter of Calendar Year 2005. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for a future inspection at your facility.

Plant performance for the most recent quarter was within the Licensee Response Column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all PIs indicating performance at a level requiring no additional NRC oversight (Green).

However, as part of the baseline inspection program, NRC will be conducting an inspection using Inspection Procedure 71150, "Discrepant or Unreported Performance Indicator Data." This inspection will be conducted to resolve a potential discrepancy related to reporting safety system unavailability for High Pressure Safety Injection Train B. On September 9, 2004, while performing a surveillance test, the safety injection piping between the containment sump outlet isolation and check valve could not be pressurized. Troubleshooting identified that the isolation valve was not fully closed following maintenance in November 2003. It was subsequently determined that under certain accident conditions with a medium or large break loss of coolant accident, containment pressure would force air through the isolation valve and into the safety injection piping. This would create a back pressure on the refueling water storage pool suction check valve, potentially isolating flow from the pool to the containment spray and emergency core cooling pumps prior to the recirculation actuation setpoint. This was documented as a licensee-identified violation in NRC Inspection Report 05000382/2004005.

Subsequently, your staff performed an analysis which determined that, with a certain amount of leakage, the valve could still have performed its safety function. However, our preliminary review indicates that your analysis did not bound the condition. Your analysis evaluated the leakage with the valve positioned open using exactly one turn on the valve actuator manual handwheel. This determination was made on the basis of the operator's recollection that he

turned the valve handwheel approximately one turn closed following the test failure. In two different measurements at this manually opened position, valve gap openings of 16 and 27 mils were measured. In each instance, testing demonstrated that the valve could perform its function. However, your testing and analysis did not identify the maximum range of valve opening gaps that could be obtained with the manual handwheel at the one-turn-open position, nor the minimum gap size that would render the valve unable to perform its safety function. Given the internal valve design and tolerances, the valve gap size could be greater than the two instances measured. Also, it is not certain that the valve was only one turn open given that the results of the leak test that was reperformed with the valve handwheel one turn open did not correlate to the September 9, 2004, test results.

Because you believed the train could still perform its safety function, no high pressure safety system unavailability time was reported in your performance indicator submission. However, since the condition was not bounded by your analysis, the possibility exists that the train may not have been available between November 2003 and September 2004. Consequently, we will conduct an inspection to review this issue. The staff will also modify the NRC web page to show the PI in question as discrepant (i.e., Gray) and that the PI is under NRC review. Upon completion of the inspection, and recalculation of the PI, if applicable, the PI will be assigned the color consistent with the results of the inspection. We will coordinate with your staff to schedule the subject inspection.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact me at (817) 860-8147 with any questions you may have regarding this letter.

Sincerely,

/RA/ VGGaddy for

David N. Graves, Chief
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Docket: 50-382
License: NPF-38

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SISP Review Completed: **_VGG_** ADAMS: / Yes No Initials: **_VGG_**
 / Publicly Available Non-Publicly Available Sensitive / Non-Sensitive

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