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**Jerry A. Ridgel**  
Acting Nuclear Safety Assurance Director  
Waterford 3

W3F1-2006-0038

November 29, 2006

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

Subject: Generic Letter 2004-02 Commitment Revision  
Waterford Steam Electric Station, Unit 3 (Waterford 3)  
Docket No. 50-382  
License No. NPF-38

Dear Sir or Madam:

The purpose of this letter is to notify the NRC of changes to Entergy's commitment dates to address the issues of Generic Letter 2004-02 "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors" for Waterford 3.

By letters dated September 16, 2005 and December 19, 2005, Entergy provided its responses to Generic Letter 2004-02 "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors" for Waterford 3. In the September 16, 2005 correspondence, Entergy committed, in part, to install new Safety Injection Sump strainers and to resolve chemical effects, downstream effects, and the resulting effects on the final head loss by December 20, 2006, during refuel outage 14 for Waterford 3. Entergy will install the new strainers for the Safety Injection Sump during the upcoming fall 2006 refuel 14 outage, as originally committed to in Letter W3F1-2005-0063. However, based in part on uncertainties associated with the industry's resolution of chemical and downstream effects, Entergy will not complete all the actions to address Generic Letter 2004-02 issues by December 20, 2006.

Attachment 1 provides Entergy's revised commitment dates to address the Generic Letter 2004-02 issues. Although the commitment dates were revised, the new dates remain within the required completion date of December 31, 2007, as requested in Generic Letter 2004-02.

AMC

Entergy's commitment to resolve the Generic Letter 2004-02 issues are predicated on the industry resolution of chemical and downstream effects. If it is determined that additional time will be required to resolve these issues to meet the December 31, 2007 date as specified in the Generic Letter, Entergy will inform the NRC.

The commitments with the new dates are summarized in Attachment 1. Should you have any questions concerning this submittal, please contact Greg Scott at (504) 739-6703.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 29, 2006.

Sincerely,



JAR/GCS/cbh

Attachments: 1. List of Regulatory Commitments

cc: Dr. Bruce S. Mallett  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
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Arlington, TX 76011-8064

NRC Senior Resident Inspector  
Waterford Steam Electric Station Unit 3  
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Killona, LA 70057-3093

U. S. Nuclear Regulatory Commission  
Attn: Mr. M. Fields  
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Washington, DC 20005-3502

**Attachment 1**

**W3F1-2006-0038**

**List of Regulatory Commitments**

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
W-3 will meet the applicable Regulatory Requirements discussed in the generic letter.	X		December 31, 2007
W-3 plant modifications to install new sump strainers will be implemented during the fall 2006 refueling outage.	X		December 20, 2006
Entergy plans to evaluate the adequacy of the strainer design and will incorporate chemical effects once the tests results to quantify chemical debris effect on head-loss have been published. At the same time, an additional evaluation will be performed to determine the impact of the sump pH, spray duration, and the increased temperature profile on the head-loss due to chemical effects.		X	December 31, 2007
Entergy will ensure that as part of the modification process, insulation materials that are introduced to containment are identified and evaluated to determine if they could affect sump performance or lead to downstream equipment degradation.		X	December 20, 2006
Entergy will repair or assess damaged qualified coatings to ensure that the quantities of failed coatings in the debris generation calculation are not exceeded.		X	December 20, 2006
Entergy will ensure that unqualified coatings introduced to containment are identified.		X	December 20, 2006
Entergy will implement a program to track the unqualified coatings to ensure that the quantity of unqualified coatings in the debris generation calculation is not exceeded.		X	December 20, 2006

<b>COMMITMENT</b>	<b>TYPE</b> (Check One)		<b>SCHEDULED COMPLETION DATE</b> (If Required)
<p>Entergy will implement a program to track the tags and labels inside containment to ensure that the amount does not exceed the sacrificial area provided in the design.</p>		X	December 20, 2006
<p>As part of the containment walkdowns used to identify potential debris sources, measurements were taken to conservatively estimate the amount of latent dirt and dust inside of containment. These measurements were taken at a point during the respective refueling outage where the level of dirt and dust would be much higher than during normal power operation. Subsequent to the measurements being taken but prior to unit startup, extensive cleaning was performed. These cleaning activities are consistent with normal housekeeping practices and associated administrative requirements. To provide an additional level of conservatism, the actual dirt and dust quantities assumed in the analysis are much greater than the values determined from the measurements. In order to ensure that the analysis remains bounding, Entergy intends to perform these types of measurements (latent debris) every third refueling outage, although this frequency may be relaxed following the first measurement.</p>		X	Recurring every third refueling outage