



Entergy Nuclear South
Entergy Operations, Inc.
17265 River Road
Killona, LA 70057
Tel 504 739 6660
Fax 504 739 6678
kwals1@entergy.com

Kevin T. Walsh
Vice President, Operations
Waterford 3

W3F1-2007-0017

May 3, 2007

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

Subject: Response to Generic Letter 2007-01
Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

Dear Sir or Madam:

- References:
1. NRC Generic Letter 2007-01, dated February 7, 2007 "Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients" (ILN: 07-0021)
 2. NEI letter from J. H. Riley to Administrative Points of Contact dated March 16, 2007 "Guidance for Response to GL 2007-01"

Dear Sir or Madam:

Per reference 1, the NRC issued Generic Letter (GL) 2007-01 to request facilities to submit the following information to the NRC within 90 days of the date of the Generic Letter:

- (1) Provide a history of inaccessible or underground power cable failures for all cables that are within the scope of 10 CFR 50.65 (the Maintenance Rule) and for all voltage levels. Indicate the type, manufacturer, date of failure, type of service, voltage class, years of service, and the root causes for the failure.
- (2) Describe inspection, testing and monitoring programs to detect the degradation of inaccessible or underground power cables that support EDGs, offsite power, ESW, service water, component cooling water and other systems that are within the scope of 10 CFR 50.65 (the Maintenance Rule).

The response to Question 1 is provided in the attachment to this letter. Waterford 3 has researched plant records and interviewed cognizant plant personnel concerning underground cable failures at the plant. In researching plant records for the requested

A127

information, Waterford 3 used the guidance provided in Reference 2 to clarify the population of cables of interest. Results of research indicate that Waterford 3, to date, has experienced one cable failure within the scope of Generic Letter 2007-01. The records research constituted searches of the Waterford 3 Plant Condition Reporting System (PCRS) and Maintenance Rule data.

In response to Question 2, Waterford 3 inspection, testing and monitoring practices presently include visual cable inspection during meggering of cables and connected equipment during maintenance activities. Plant condition reporting is used to determine root cause and extent of conditions and would be the process for determining the need for and the extent of any increased cable monitoring.

The requested information is being provided pursuant the requirements of 10 CFR 50.54(f). I declare under the penalty of perjury that the foregoing information is true and correct.

Executed on May 3, 2007.

There are no new commitments contained in this submittal. If you have any questions, please contact Oscar Pipkins at (504) 739-6707.

Sincerely,



KTW/OPP/ssf

Attachment: 1. History of Inaccessible or Underground Power Cable Failures Within the Scope of 10CFR50.65 for Waterford 3 SES

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

NRC Senior Resident Inspector
Waterford Steam Electric Station Unit 3
P.O. Box 822
Killona, LA 70066-0751

U. S. Nuclear Regulatory Commission
Attn: Mr. N. Kalyanam
Mail Stop O-07D1
Washington, DC 20555-0001

Wise, Carter, Child & Caraway
ATTN: J. Smith
P.O. Box 651
Jackson, MS 39205

Winston & Strawn
ATTN: N.S. Reynolds
1700 K Street, NW
Washington, DC 20006-3817

Morgan, Lewis & Bockius LLP
ATTN: T.C. Poindexter
1111 Pennsylvania Avenue, NW
Washington, DC 20004

Attachment 1 to

W3F1-2007-0017

History of Inaccessible or Underground Power Cable
Failures Within the Scope of 10CFR50.65 for
Waterford 3 SES

History of Inaccessible or Underground Power Cable Failures within the Scope of 10CFR 50.65 for Waterford 3 SES

Cable Type	Voltage Class	Manufacturer	Date of Failure / Service (Yrs.)	Type of Service	Root Cause
Power Cable 1/C 250 MCM	5 kV	Okonite or Anaconda	1 st Quarter 1992 / Approx 10 -12 Yrs	Feeder cable from 3A2 to 3A4 (4160 kV)	Moisture Absorption (most likely root cause)