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Robert J. Murillo
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Waterford 3

W3F1-2007-0062

December 12, 2007

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

SUBJECT: Supplement 2 to Request for Alternative W3-ISI-005
Request to Use ASME Code Case N-716
Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

REFERENCES: 1. Entergy letter dated October 18, 2007, *Request for Alternative W3-ISI-005 Request to Use ASME Code Case N-716* (W3F1-2007-0046)

2. Entergy letter dated November 30, 2007, *Supplement to Request for Alternative W3-ISI-005 Request to Use ASME Code Case N-716* (W3F1-2007-0061)

Dear Sir or Madam:

Per Reference 1, Entergy requested NRC review and approval to implement a risk-informed Inservice Inspection (ISI) program based on ASME Code Case N-716. The purpose of this letter is to provide the NRC additional information to support the NRC Staff review and approval of the risk informed inservice inspection (ISI) using Code Case N-716 alternative.

On November 29, 2007, Entergy held a conference call with the NRC wherein Entergy personnel addressed how the Waterford 3 (W3) risk informed ISI using Code Case N-716 alternative addressed the NRC Safety Evaluation Report (SER) and Grand Gulf Nuclear Station (GGNS) Request for Additional Information (RAIs) that were the basis for the NRC approval of the GGNS N-716 alternative. On November 30, 2007, W3 submitted to the NRC a letter (Reference 2) documenting how each GGNS RAI was addressed in the W3 ISI N-716 Alternative request.

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MRR

Subsequent to the November 29, 2007 conference call, there remained two challenges to resolve current NRC comments, specifically, the requested alternative approval schedule and the use of the ASME Standard RA-Sb-2005 for the Waterford 3 PRA flooding analysis.

Regarding the requested review schedule, W3 is revising the requested approval date of March 14, 2008 in Reference 1 to an approval date of April 18, 2008, one week prior to the currently scheduled start of Refuel 15 on April 27, 2007. W3 would also appreciate verbal disclosure on the approval status by March 14, 2008 in order to optimize planning for the implementation of ISI N-716 Alternative.

After discussion with Entergy personnel regarding the ASME Standard RA-Sb-2005, the effort required to perform a gap analysis between the ASME Standard and the current W3 PRA, in conjunction with the NRC staff resources required to review such an analysis, would be prohibitive as compared to a review of a final Flooding Analysis developed specifically to meet the ASME Standard. Therefore, W3 is hereby making a commitment to update the internal flooding portion of the W3 PRA to conform to ASME Standard RA-Sb-2005. Independent of the ISI N-716 request and in an effort to have W3's PRA conform to the latest standards, W3 had already started work in the fourth quarter 2007 on the update of the internal flooding portion of the W3 PRA. This analysis will conform to the internal flooding requirements in ASME Standard RA-Sb-2005. We expect to complete the update of the internal flooding portion of the W3 PRA by February 3, 2008. This will allow Waterford 3 to provide confirmation to the NRC in mid February 2008 of conformance with ASME Standard RA-Sb-2005 so the NRC review and approval can proceed unabated. It is expected that the updated flooding study will result in removal of conservatisms providing for increased margin. As a result, we do not anticipate any changes to the element selections described in Reference 1.

We appreciate the effort the NRC Staff has taken in promptly addressing schedule and technical challenges. We believe the approach we have presented herein is viable, and this approach will make the best use of the time and investment already made on this submittal, both by the NRC Staff and Entergy.

This letter contains one additional commitment identified in Enclosure 1. Should you have any questions regarding this submittal, please contact Ron Williams at (504) 739-6255.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Williams", written in a cursive style.

RJM/RLW

Enclosure: 1. Licensee-Identified Commitments

cc: Mr. Elmo E. Collins, Jr.
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U. S. Nuclear Regulatory Commission
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NRC Senior Resident Inspector
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ENCLOSURE 1

W3F1-2007-0062

LICENSEE-IDENTIFIED COMMITMENTS

LICENSEE-IDENTIFIED COMMITMENTS

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Waterford 3 (W3) will submit a letter to the NRC summarizing the results of the updated internal flooding portion of the W3 PRA and confirming that the updated PRA conforms to ASME Standard RA-Sb-2005.	✓		February 18, 2008