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Licensing Manager  
Waterford 3

W3F1-2008-0032

May 12, 2008

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

Subject: Request for Extension of Completion Date for Resolution of Generic Letter  
2004-02  
Waterford Steam Electric Station, Unit 3 (Waterford 3)  
Docket No. 50-382  
License No. NPF-38

- References:
1. Waterford 3 letter dated November 14, 2007, Request for Extension of Completion date for Corrective Actions Required by Generic Letter 2004-02 (W3F1-2007-0051)
  2. NRC letter dated December 12, 2007, granting Waterford Steam Electric Station, Unit 3 approval of extension request for corrective actions re: GL 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accident at Pressurized Water Reactors" (TAC No. MC4729)
  3. Waterford 3 letter dated February 29, 2008, Supplemental Response to NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors" (W3F1-2008-0018)

Dear Sir or Madam:

The purpose of this letter is to request an extension of 60 days for the commitments of record for responding to Generic Letter 2004-02 and to provide the corresponding justification for the extension request. On May 8, 2008, Waterford Licensing Manager Robert Murillo discussed the proposed extension request with Leon Whitney, NRC lead GSI 191 Inspector for Waterford 3, Michael Scott, Office of Nuclear Reactor Regulation, and Kaly Kalyanam, Waterford 3 NRC Project Manager. In accordance with the discussion, Waterford 3 is providing a written response requesting the extension.

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The commitments of record for responding to Generic Letter 2004-02 were documented in References 1 and 3. The NRC approved the Waterford 3 request in Reference 2. Waterford 3 is requesting an extension of 60 days for the commitments of record as documented in Reference 3, as follows:

- The chemical, downstream, hydraulic, and in-core analyses will be completed by July 24, 2008 instead of May 24, 2008.
- Entergy will update the licensing basis to reflect the resolution of Waterford 3 GSI-191 issues by September 24, 2008 instead of July 24, 2008
- A complete response to the Generic Letter will be provided to the NRC by October 24, 2008 instead of August 24, 2008.

The extension is justified due to the significant progress that has been made in addressing the requirements of Generic Letter 2004-02. New strainers are installed, and testing has been completed. Waterford 3 factored the final technical issues from the NRC Generic Letter 2004-02 audit report into the various calculations being finalized, including debris generation and transport, head loss, chemical effects, and downstream effects.

Recent technical issues were found that required additional testing which have been promptly addressed. Waterford 3 performed additional chemical effects testing beyond that performed at the Vuez facility. The new chemical effects testing was performed in accordance with the methodology contained in WCAP -16530-NP, Evaluation of Post-Accident Chemical Effects in Containment Sump Fluids to Support GSI-191, which resulted in more accurate results. The downstream effects analysis has identified limited areas that required additional analysis, such as HPSI pump vibration and hydraulic analysis.

Waterford 3 has had to compete for vendor resources in addressing these technical and testing issues. In order to address the technical issues from Generic Letter 2004-02 in as timely a manner as possible, Waterford 3 has changed vendors on one contract and has had weekly calls with others to track progress. These calls have kept the analyses on track for completion as soon as possible. This will also reduce the amount of time needed for Entergy reviews of the draft calculations.

In Reference 1, Entergy provided the basis for the extension request. The information provided in that submittal, upon which the NRC's extension approval was granted, remains unchanged by an extension of time to complete the analyses and update the licensing basis. Entergy believes that an additional 60 days beyond the current extension date will be adequate to complete the commitments of record.

The reasons for the extension meet the criteria identified in SECY-06-0078, from L. A. Reyes, NRC Executive Director for Operations, to NRC Commissioners, "Status of Resolution of GSI-191, Assessment of Debris Accumulation on PWR Sump Performance," dated March 31, 2006, for extension beyond the completion date of December 31, 2007, specified in GL 2004-02 and documented in Reference 1.

The commitments of record for this letter with the revised completion dates are specified in Attachment 1. These commitments replace, in their entirety, the commitments documented in References 1 and 3.

Please contact Robert J. Murillo at (504) 739-6715 should there be any questions regarding this letter.

Sincerely,



RJM/GC8/ssf

Attachment: List of Regulatory Commitments

cc: Mr. Elmo E. Collins, Jr.  
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**Attachment 1**

**W3F1-2008-0032**

**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	
<ul style="list-style-type: none"> <li>The chemical, downstream, hydraulic, and in-core analyses will be completed by July 24, 2008 instead of May 24, 2008.</li> </ul>	x		July 24, 2008
<ul style="list-style-type: none"> <li>Entergy will update the licensing basis to reflect the resolution of Waterford 3 GSI-191 issues by September 24, 2008 instead of July 24, 2008</li> </ul>	x		September 24, 2008
<ul style="list-style-type: none"> <li>A complete response to the Generic Letter will be provided to the NRC by October 24, 2008 instead of August 24, 2008.</li> </ul>	x		October 24, 2008