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W3F1-2008-0034

May 17, 2008

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

SUBJECT: Non-Application of Alternative W3-ISI-004 to the Second Interval ISI
Examinations
Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

- REFERENCES: 1 NRC letter dated March 25, 2008, *Waterford Steam Electric Station, Unit 3 – Request for Relief W3-ISI-004, Alternative to Requirements to Allow Extension to Second 10-Year Inservice Inspection Interval Beyond That Currently Allowed by ASME Code, Paragraph IWA-2340(d) (TAC NO. MD6351)*
- 2 NRC letter dated April 28, 2008, *Waterford Steam Electric Station, Unit 3 – Request for Alternative W3-ISI-005, Request to Use ASME Code Case N-716 (TAC NO. MD7061)*

Dear Sir or Madam:

The purpose of this letter is to inform the NRC Staff Waterford 3 will not apply ASME Alternative W3-ISI-004 approved by the NRC in Reference 1. This letter provides the basis for this decision.

Approval by the NRC of ASME Alternative W3-ISI-005 (Reference 2) has obviated the need to apply ASME Alternative W3-ISI-004. Alternative W3-ISI-004 authorized inservice examination of seven (7) Examination Category B-J dissimilar metal welds in the Reactor Coolant System cold leg piping to be extended to the end of the sixteenth refueling/outage currently scheduled for the fall 2009. Alternative W3-ISI-005 replaces the number and locations of nondestructive examination inspections based on ASME, Section XI requirements for the current Waterford 3 10-year ISI program with the number and locations of the NDE inspections based on the Risk Informed ISI (RI-ISI) guidelines. Therefore, NDE inspection of the 7 dissimilar metal welds is not required for the second interval under Alternative W3-ISI-005.

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The commitments of record made in conjunction with the NRC approval of Alternative W3-ISI-004 are no longer applicable, and therefore the commitments, as re-stated below, will not be implemented.

- Perform a bare metal visual examination of the seven Category B-J dissimilar metal welds during RF15.
- Submit a request for alternative by October 2008 that will commit to either examine the welds with an ultrasonic method acceptable to the NRC or to install a structural weld overlay on the deferred dissimilar metal welds contained in Request for Alternative W3-ISI-004 during RF16 as the alternative to the inspection requirements of ASME Code Section XI.

As stated in the NRC Safety Evaluation Report for Alternative W3-ISI-005, Waterford 3 will use MRP-139 as an augmented inspection program for the scheduled inspection and management of PWSCC-susceptible dissimilar metal weld that will supplement the RI-ISI program. The RI-ISI program will not be used to eliminate any MRP-139 requirements. The information herein provided is judged to be in accordance with Alternative W3-ISI-005, and also, the information has been discussed with the NRC Project Manager.

Please contact Robert Murillo at (504) 739-6715 should you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "RJM", with a long horizontal line extending to the right.

RJM/RLW/

cc: Mr. Elmo E. Collins, Jr.
Regional Administrator
U. S. Nuclear Regulatory Commission
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