

September 9, 2008

Vice President, Operations
Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3
17265 River Road
Killona, LA 70057-3093

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 – RE: GENERIC LETTER 2008-01, “MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS,” PROPOSED ALTERNATIVE COURSE OF ACTION (TAC NO. MD7894)

Dear Mr. Walsh:

On January 11, 2008, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems” (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The GL requested licensees to submit information to demonstrate that the emergency core cooling, decay heat removal, and containment spray systems (hereinafter referred to as the “subject systems”) are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance.

In accordance with Section 50.54(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), GL 2008-01 required that each licensee submit the requested information within 9 months of the date of the GL. The GL also stated that if a licensee cannot meet the requested 9-month response date, the licensee is required to provide a response within 3 months of the date of the GL, describing the alternative course of action it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

By letter dated May 12, 2008, Entergy (the licensee) submitted a 3-month response to GL 2008-01 for Waterford Steam Electric Station, Unit 3 (Waterford 3). The NRC staff assessment of the 3-month response for Waterford 3 is contained in the enclosure.

The NRC staff reviewed the licensee’s proposed alternative course of action and the associated basis for acceptance and concluded that for Waterford 3, with the exception of the clarifications and associated requests discussed in the enclosure, your proposed alternative course of action related to your 9-month supplemental (post-outage) response are acceptable. However, the NRC staff requests, within two weeks of the date of this letter, or a week after your restart from the aftermath of Hurricane Gustav, whichever is later, that you submit a 3-month supplemental response to revise your proposed alternative course of action related to your 9-month initial response for Waterford 3, as described in the enclosure.

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If you have any questions regarding this letter, please feel free to contact me at (301) 415-1480.

Sincerely,

/ra/

N. Kalyanam, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure: As stated

cc w/encl: See next page

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NRR-106

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Waterford Steam Electric Station, Unit 3

(2/25/08)

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NRC STAFF ASSESSMENT OF 3-MONTH RESPONSE

TO GENERIC LETTER 2008-01

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1. Background

On January 11, 2008, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The GL requested licensees to submit information to demonstrate that the emergency core cooling, decay heat removal, and containment spray systems (hereinafter referred to as the "subject systems") are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance. Specifically, the GL requested licensees to provide: (1) a description of the results of evaluations that were performed in response to the GL; (2) a description of all corrective actions that the licensee determined were necessary; and (3) a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

In accordance with Section 50.54(f) of Title 10 of the *Code of Federal Regulations* (10 CFR), GL 2008-01 required that each licensee submit the requested information within 9 months (hereinafter referred to as the "9-month submittal") of the date of the GL. The GL also stated that if a licensee cannot meet the requested 9-month response date, the licensee is required to provide a response within 3 months (hereinafter referred to as the "3-month submittal") of the date of the GL, describing the alternative course of action it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

2. Licensee's Proposed Alternative Course of Action

By letter dated May 12, 2008, Entergy (the licensee) submitted a 3-month response to GL 2008-01 for Waterford Steam Electric Station, Unit 3 (Waterford 3). The licensee stated that the only GL 2008-01 reporting requirement that will not be completed by the required response time is walkdowns of some segments of piping in the GL subject systems, including the high pressure safety injection, low pressure safety injection, and containment spray systems. Since portions of the GL subject systems are inaccessible or located in high dose areas during power operation, an outage is required to complete the required walkdowns. The licensee stated that it could not complete all required walkdowns during the recent refueling outage because of insufficient lead-time to perform the proper pre-planning prior to the outage.

Enclosure

The licensee's letter dated May 12, 2008, listed the following commitments:

1. Perform the walkdowns and complete the evaluations of the accessible portions of the GL systems by October 11, 2008.
2. Complete the walkdown of the inaccessible portions of the systems during next refueling outage that is planned for November 2009 and complete the evaluations these portions of the systems by January 30, 2010.
3. Submit the GL 2008-01 requested information to the NRC by March 31, 2010.

3. NRC Staff Assessment

The NRC staff finds that the stated reasons for why it cannot provide all GL requested information by the requested 9-month response date to be acceptable. However, the NRC staff notes that in its 3-month submittal dated May 12, 2008, the licensee committed to provide its initial response for the requested information by March 31, 2010, which is about 17 months after the GL was issued. In addition, the NRC staff that notes that the commitment to submit the GL 2008-01 requested information to the NRC by March 31, 2010, is unclear whether this date could be more than 90 days following the end of the next refueling outage that is planned for November 2009.

The NRC staff requests that the licensee submit a 3-month supplemental response for Waterford 3 to revise its proposed alternative course of action related to its 9-month response. The NRC staff requests the licensee to submit the information requested in GL 2008-01 as follows:

1. 9-Month Initial Submittal - For the portions of the subject systems that are accessible prior to the next refueling outage that is planned for November 2009 at Waterford 3, provide all GL requested information to the NRC by October 11, 2008.
2. 9-Month Supplemental (Post-Outage) Submittal - Except for the long-term items described below, provide all remaining GL requested information for the subject systems to the NRC within 90 days following startup from the next refueling outage that is planned for November 2009 at Waterford 3.

For each of these two submittals (the 9-month initial and supplemental submittals), and consistent with the information requested in the GL, the licensees should provide: (1) a description of the results of evaluations that were performed in response to the GL; (2) a description of all corrective actions that the licensee determined were necessary; and (3) a statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

The NRC staff noted that the licensee's submittal dated May 12, 2008, did not mention other potential long-term actions that are identified in the GL. For instance, the industry is assessing

whether it is necessary to perform pump testing to determine the allowable limits on ingested gas volume in pump suctions, as well as the need to develop an analysis capability to adequately predict void movement (entrapped gas) from piping on the suction side of the pumps into the pumps. It is unlikely this industry effort will be complete for the 9-month initial or supplemental submittals. Further, technical specification changes may be necessary to reflect the improved understanding achieved during response to the GL, but these cannot be fully developed for the 9-month initial or supplemental submittals. A Technical Specifications Task Force traveler may provide a generic example that can be adopted by licensees. The NRC staff requests that the licensee address in its 9-month submittal how it plans to track such long-term actions (e.g., Corrective Action Program and/or commitment tracking). The NRC plans to perform follow up inspections of licensee responses to GL 2008-01 at all plants using a Temporary Instruction inspection procedure.