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W3F1-2008-0060

September 18, 2008

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

SUBJECT: Request for Alternative W3-ISI-006  
Proposed Alternative to Extend the Second 10-Year Inservice  
Inspection Interval for Reactor Vessel Internal Weld Examinations  
Waterford Steam Electric Station, Unit 3  
Docket No. 50-382  
License No. NPF-38

- REFERENCES:
1. Letter from Entergy to NRC, *Request for Alternative W3-ISI-003 Proposed Alternative to Extend the Second 10-Year Inservice Inspection Interval for Reactor Vessel Internal Weld Examinations*, dated April 26, 2007 (CNRO-2007-00020)
  2. Letter from NRC to Entergy Operations, Inc, *Waterford Steam Electric Station, Unit 3 – Request for Alternative W3-ISI-003 from the Requirements of American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI (TAC No. MD5387)*, dated February 15, 2008
  3. Letter from NRC to Mr. Gordon Bischoff, Manager Owners Group Program Management Office, *Final Safety Evaluation for Pressurized Water Reactor Owners Group (PWROG) Topical Report (TR) WCAP-16168-NP, Revision 2, Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval*, (TAC No. MC9768), dated May 8, 2008
  4. Letter from Entergy to NRC, *License Amendment Request NPF-38-280 License Condition to Support Implementation of Extended In-Service Inspection Interval*, dated September 18, 2008 (W3F1-2008-0061)

A047  
NRR

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a(a)(3)(i), Entergy Operations, Inc. (Entergy) proposes an alternative to the requirements of ASME Section XI, paragraph IWB-2412, *Inspection Program B*, for Waterford Steam Electric Station, Unit 3 (Waterford 3). By letter (Reference 1), Entergy proposed an alternative to the requirements of ASME Code, Section XI, paragraph IWB-2412, *Inspection Program B*. In Reference 2, the NRC Staff approved Request for Alternative W3-ISI-003 to extend the second 10-year ISI reactor vessel (RV) weld examination from the Spring 2008 refueling outage (RF15) to the end of the Fall 2009 refueling outage (RF16). The NRC Staff concurred that the risk associated with the one-cycle extension of the ISI interval was sufficiently small such that the alternative continued to provide an acceptable level of quality and safety. This Request for Alternative was submitted as a result of an on-going initiative with the PWR Owner Group for extending the Inservice Inspection requirements. In Reference 3, the NRC Staff approved WCAP-16168-NP-A Revision 2, *Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval*, which provides for an extension of the inservice inspection interval for reactor vessel welds (Examination Category B-A) and the nozzle-to-vessel welds and inner radius sections (Examination Category B-D) from 10 to 20 years. In Reference 4, Entergy is requesting an amendment to the Waterford 3 operating license, concurrent with this proposed alternative as required by Reference 3, that will provide the NRC with the information and analyses requested in Section (e) of the final rule for 10 CFR 50.61a, (or the proposed 10 CFR 50.61a, given in 72 FR 56275, prior to issuance of the final 10 CFR 50.61a) following completion of each ASME Code, Section XI, Category B-A and B-D weld inspections.

Entergy is submitting Request for Alternative W3-ISI-006 (see Enclosure 1), which proposes to extend the second interval for RV pressure retaining welds, Category B-A and B-D, until 2015 plus or minus one refueling cycle, for the subject examinations. The technical justification for this request is consistent with the guidance provided in Regulatory Guide 1.174, dated November 2002. Additionally, NRC-approved topical report WCAP-16168-NP-A, Revision 2, *Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval*, includes an evaluation of risk based on plant specific information for Waterford 3 in Appendix A. The extension of the inspection interval for these examinations would result in an acceptable level of quality and safety, as described in the enclosed request.

Entergy requests NRC approval by September 10, 2009, in order to support planning activities for Refueling Outage 16.

This letter contains two commitments that replace the Reference 1 commitment in its entirety and is identified in Enclosure 2. If you have any questions or require additional information, please contact me at (504) 739-6715.

Very truly yours,



RJM/RLW:ssf

- Enclosures: 1. Request for Alternative W3-ISI-006  
2. List of Regulatory Commitments

cc: Mr. Elmo E. Collins, Jr.  
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**ENCLOSURE 1**  
**To**  
**W3F1-2008-0060**

**REQUEST FOR ALTERNATIVE**  
**W3-ISI-006**

**ENTERGY OPERATIONS, INC.  
WATERFORD STEAM ELECTRIC STATION, UNIT 3  
REQUEST FOR ALTERNATIVE  
W3-ISI-006**

**I. COMPONENTS**

The affected component is the Waterford Steam Electric Station, Unit 3 (Waterford 3) reactor vessel; specifically, the following ASME Section XI Examination Categories and Item Numbers covering examinations of the reactor vessel. These examination categories and item numbers are from IWB-2500 and Table IWB-2500-1 of the ASME BPV Code, Section XI.

<b>Examination Category</b>	<b>Item Number</b>	<b>Description</b>
B-A	B1.11	Circumferential Shell Welds
B-A	B1.12	Longitudinal Shell Welds
B-A	B1.21	Circumferential Head Welds
B-A	B1.22	Meridional Head Welds
B-A	B1.30	Shell-to-Flange Weld
B-A	B1.40	Head-to-Flange Weld
B-A	B1.50	Repair Welds
B-A	B1.51	Beltline Region Repair Welds
B-D	B3.90	Nozzle-to-Vessel Welds
B-D	B3.100	Nozzle Inside Radius Section

(Throughout this request, the above examination categories are referred to as "the subject examinations," and the ASME BPV Code, Section XI, is referred to as "the Code.")

Code Class: 1

- References:
1. Letter from NRC to Entergy Operations, Inc, *Waterford Steam Electric Station, Unit 3 – Request for Alternative W3-ISI-003 from the Requirements of American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI (TAC No. MD5387)*, dated February 15, 2008
  2. Letter from F. P. Schiffley, Westinghouse Owners' Group, "Transmittal of WCAP-16168-NP, Revision 1, Risk-Informed

- Extension of Reactor Vessel In-Service Inspection Interval, MUHP-5097/5098/5099, Tasks 2008/2059," January 26, 2006 (ML060330504)
3. Federal Register Notice, (72 FR 56275) "Alternative Fracture Toughness Requirements for Protection against Pressurized Thermal Shock Events," October 3, 2007 (ML072780354)
  4. NUREG-1806, "Technical Basis for Revision of the Pressurized Thermal Shock (PTS) Screening Limit in the PTS Rule (10 CFR 50.61): Summary Report," August 2007
  5. NUREG-1806, "Technical Basis for Revision of the Pressurized Thermal Shock (PTS) Screening Limit in the PTS Rule (10 CFR 50.61): Appendices," August 2007 (ML07282069)
  6. NUREG-1874, "Recommended Screening Limits for Pressurized Thermal Shock (PTS)," March 2007 (ML070860156)
  7. U.S. NRC, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," Regulatory Guide 1.174, Revision 1, November 2002 (ML023240437)
  8. PWR Owners Group letter OG-06-356, "Plan for Plant Specific Implementation of Extended Inservice Inspection Interval per WCAP 16168-NP, Revision 1, "Risk Informed Extension of the Reactor Vessel In-Service Inspection Interval," MUHP 5097-99, Task 2059," dated October 31, 2006
  9. SEC-07-0104, "Proposed Rulemaking-Alternate Fracture Toughness Requirements For Protection Against Pressurized Thermal Shock Events," June 25, 2007 (ML070570525)
  10. Letter from the NRC to the Westinghouse Owners Group, Acceptance for Review of Westinghouse Owners Group (WOG) Topical Report WCAP-16168-NP, Rev. 1, Risk-Informed Extension of Reactor Vessel In-Service Inspection Interval (TAC No. MC9768), September 19, 2006
  11. Letter from NRC to Mr. Gordon Bischoff, Manager Owners Group Program Management Office, "Final Safety Evaluation for Pressurized Water Reactor Owners Group (PWROG) Topical Report (TR) WCAP-16168-NP, Revision 2, Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval, (TAC No. MC9768)," May 8, 2008
  12. WCAP-16168-NP-A, Revision 2, "Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval" June 2008
  13. Regulatory Guide 1.150, "Ultrasonic Testing of Reactor Vessel Welds during Pre-Service and Inservice Examinations"
  14. NRC Regulatory Guide 1.154, "Format and Content of Plant-Specific Pressurized Thermal Shock Safety Analysis Reports for

Pressurized Water Reactors”

15. NRC Regulatory Guide 1.174, Revision 1, “An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant Specific Changes to the Licensing Basis,” November 2002

## II. CODE REQUIREMENTS

The Code IWB-2412, *Inspection Program B*, requires volumetric examination of essentially 100% of reactor vessel pressure-retaining welds identified in Table IWB-2500-1 once each 10-year interval. IWA-2430(d) allows inspection intervals to be extended by as much as one year if this adjustment does not cause successive intervals to be altered by more than one year.

## III. PROPOSED ALTERNATIVE

Pursuant to 10.CFR 50.55a(a)(3)(i), Entergy Operations, Inc. (Entergy) proposes an alternative from the requirement of IWB-2412 that pertains to volumetric examination of reactor vessel pressure-retaining welds, Examination Categories B-A and B-D welds identified in Section 1, above. Entergy proposes to defer completion of the Code required volumetric examination for the second inservice inspection interval until 2015 and to perform the third inservice inspection interval on a twenty-year inspection interval in 2035, instead of the currently required 10 year inspection interval. These dates are consistent with the information provided to the NRC Staff in PWR Owners Group letter OG-06-356 (Reference 8). As delineated in the NRC SE for WCAP-16168-NP-A, Revision 2 (Reference 11) section 3.6, this request for alternative will be for the remainder of the licensed period for the plant.

An alternative inspection interval is requested on the basis that the current inspection interval can be extended based on risk-informed insights that show that extending the inspection interval from 10 to 20 years results in a change in reactor vessel failure frequency (References 11 and 12) that satisfies the requirements of NRC Regulatory Guide 1.174 (Reference 15).

## IV. BASIS FOR PROPOSED ALTERNATIVE

### A. Background

The Waterford 3 second inservice inspection (ISI) interval began July 1, 1997 and was originally scheduled to end June 30, 2007. The Code IWA-2430(d) allows a one-year extension of an interval without NRC approval, which extended the interval to June 30, 2008. In order to comply with Code requirements, second interval examination of the reactor vessel welds (Examination Category B-A), the nozzle-to-vessel welds and inner radius sections (Examination Category B-D), and reactor vessel nozzle-to-piping welds (Examination Category B-J), were scheduled to be performed during Waterford 3's spring 2008 refueling outage (RF15). In Reference 1, the NRC Staff approved Request for Alternative W3-ISI-003 to extend the second 10-year ISI reactor vessel (RV) weld examination from the Spring 2008 refueling outage (RF15) to the end of the Fall 2009

refueling outage (RF16) based on the risk associated with the one-cycle extension being sufficiently small such that the alternative continued to provide an acceptable level of quality and safety.

**B. Basis for Proposed Alternative**

The methodology used to demonstrate the acceptability of extending the ISI inspection interval from 10 years to 20 years for the subject examination welds based on a negligible change in risk is contained in WCAP-16168-NP-A, Revision 2 (Reference 12). This methodology was used to perform risk analysis for pilot plants representing the Westinghouse (Beaver Valley Unit 1), Combustion Engineering (Palisades), and Babcock and Wilcox (Oconee Unit 1) reactor vessel designs and is an extension of the work that was performed as part of the NRC pressurized thermal shock (PTS) risk study (Reference 6). The critical parameters for demonstrating that this pilot plant analysis is applicable on a plant specific basis, as defined in WCAP-16168-NP-A, Revision 2, is contained in Table 1. By demonstrating that each Waterford 3 plant specific parameter shown in Table 1 is bounded by the corresponding pilot plant parameter, the application of the methodology to the Waterford 3 reactor vessel is acceptable.

<b>Table 1 Critical Parameters for Application of Bounding Analysis</b>			
<b>Parameter</b>	<b>Pilot Plant Basis</b>	<b>Plant Specific Basis</b>	<b>Additional Evaluation Required? (Y/N)</b>
Dominant PTS Transients in the NRC PTS Risk Study are applicable	NRC PTS Risk Re-Evaluation	PTS Generalization Study	No
Through Wall Cracking Frequency	3.16E-07 Events per year	2.87E-14 Events per year	No
Frequency and Severity of Design Basis Transients	13 heatup/cooldowns per year	Bounded by 13 heatup/cooldowns per year	No
Cladding Layers (Single/Multiple)	Single	Single	No



Additional information relative to the Waterford 3 reactor vessel inspections is provided in Table 2. This information confirms that satisfactory examinations have been performed on the Waterford 3 reactor vessel.

<b>Table 2 Additional Information Pertaining to Reactor Vessel Inspection</b>	
Inspection Methodology:	Past inspections have been performed to Regulatory Guide 1.150
Number of past inspections:	<ul style="list-style-type: none"> <li>- Category B-A welds (reactor vessel): 1 inspection – 1995, with the exception of weld 01-020 which was also inspected in 1988.</li> <li>- Category B-A welds (closure head): 4 inspections with 3 welds inspected 1986, 3 welds inspected 1989, 1 weld inspected 1994, 3 welds inspected 2000.</li> <li>- Category B-D welds (outlet nozzles): 2 inspections – 1988 and 1995, with the exception of weld 01-021 which was also inspected in 1989.</li> <li>- Category B-D welds (inlet nozzles): 1 inspection – 1995.</li> </ul>
Number of indications found:	Zero reportable indications have been found to date. Any recordable indications have been acceptable per ASME Section XI IWB-3500. No flaws of concern have been detected.
Proposed inspection schedule for balance of plant life:	<p>Second 10-year inservice inspection (ISI) reactor vessel (RV) weld examination was scheduled for Spring 2008, but the NRC Staff approved Request for Alternative W3-ISI-003 (Reference 1) to extend the second interval from the Spring 2008 refueling outage (RF15) to the end of the Fall 2009 refueling outage (RF16). With this submittal, the second 10-year ISI interval for Examination Category B-A and B-D RV welds is proposed to be performed in 2015. The third 10-year ISI interval for these examination categories is proposed to be performed in 2035. Note, the portion of the commitment referenced in Reference 1 to perform the second 10-year ISI interval for examination category B-J welds in the Waterford 3 Fall 2009 refueling outage (RF16) will be retained (see Enclosure 2).</p>

The information in Table 3 is identified in WCAP-16168-NP-A, Revision 2, as additional information to be provided relative to the TWCF calculation.

Table 3 Details of TWCF Calculation								
Inputs								
Reactor Coolant System Temperature, $T_{RCS}$ [°F]:			553		$T_{wall}$ [inches]:			8.62
#	Region/Component Description	Material	Cu [wt%]	Ni [wt%]	P [wt%]	Mn [wt%]	Un-Irradiated $RT_{NDT(w)}$ [°F]	Fluence [ $10^{19}$ Neutron/cm <sup>2</sup> , E>1 MeV]
1	Lower Shell Plate	A 533B	0.030	0.580	0.005	1.35	22.0	4.49
2	Lower Shell Plate	A 533B	0.030	0.620	0.006	1.35	-15.0	4.49
3	Lower Shell Plate	A 533B	0.030	0.620	0.007	1.35	-10.0	4.49
4	Intermediate Shell Plate	A 533B	0.020	0.700	0.007	1.35	-42.0	4.49
5	Intermediate Shell Plate	A 533B	0.020	0.710	0.004	1.35	-30.0	4.49
6	Intermediate Shell Plate	A 533B	0.020	0.670	0.006	1.35	-50.0	4.49
7	Lower Shell Axial Weld	Linde 0091	0.030	0.200	0.007	1.35	-80.0	4.49
8	Lower Shell Axial Weld	Linde 0091	0.030	0.200	0.007	1.35	-80.0	4.49
9	Lower Shell Axial Weld	Linde 0091	0.030	0.200	0.007	1.35	-80.0	4.49
10	Inter. Shell Axial Weld	E 8018	0.020	0.960	0.010	1.35	-60.0	4.50
11	Inter. Shell Axial Weld	E 8018	0.020	0.960	0.010	1.35	-60.0	4.50
12	Inter. Shell Axial Weld	E 8018	0.020	0.960	0.010	1.35	-60.0	4.50
13	Inter. – Lower Circ. Weld	Linde 0091	0.050	0.160	0.008	1.35	-70.0	4.49
Outputs								
Methodology Used to Calculate $\Delta T_{30}$ :				NUREG-1874				
	Region # (From Above)	$RT_{MAX-XX}$ [R]	Fluence [ $10^{19}$ Neutron/cm <sup>2</sup> , E>1 MeV]	$\phi$ (flux)	$\Delta T_{30}$ [°F]	$TWCF_{95-XX}$		
Limiting Axial Weld - AW	1	541.91	4.49	2.37E10	57.93	2.47E-18		
Limiting Plate - PL	1	541.91	4.49	2.37E10	57.93	5.52E-29		
Forging - FO	N/A	N/A	N/A	N/A	N/A	N/A		
Circumferential Weld - CW	1	541.91	4.49	2.37E10	57.93	1.15E-14		
$TWCF_{95-TOTAL} (\alpha_{AW}TWCF_{95-AW} + \alpha_{PL}TWCF_{95-PL} + \alpha_{CW}TWCF_{95-CW} + \alpha_{FO}TWCF_{95-FO})$ :							2.87E-14	

The plant-specific information requested in section 3.4 of the final safety evaluation (Reference 11) for WCAP-16168-NP-A, Revision 2, is included in Attachment 1.

## **V. CONCLUSION**

10 CFR 50.55a(a)(3) states:

"Proposed alternatives to the requirements of (c), (d), (e), (f), (g), and (h) of this section or portions thereof may be used when authorized by the Director of the Office of Nuclear Reactor Regulation. The applicant shall demonstrate that:

- (i) The proposed alternatives would provide an acceptable level of quality and safety, or
- (ii) Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety."

The current requirements for inspecting reactor vessel pressure-retaining welds have been in effect since the 1989 Edition of the Code. The industry has expended significant cost and radiological exposure to perform these inspections. Based on the results of the analysis contained in WCAP 16168-NP-A, Revision 2, it is concluded that:

1. The beltline is the most limiting region for the evaluation of risk.
2. RV inspections performed to date have not detected any significant flaws.
3. Crack extension due to fatigue crack growth during service is small.
4. The man-rem exposure can be reduced by extending the inspection interval.
5. The failure frequencies for PWR RVs due to the dominant PTS transients are well below 10<sup>-7</sup> per year.
6. The change in risk meets the RG 1.174 acceptance guidelines for a small change in LERF.
7. The increase in the RV ISI interval from 10 to 20 years satisfies all the RG 1.174 criteria, including other considerations, such as defense-in-depth.

Based on the above conclusions, the Code 10-year inspection interval for examination categories B-A and B-D welds in PWR RPVs can be extended to 20 years. In-service inspection intervals of 20 years for FENOC's Beaver Valley Unit 1, Entergy's Palisades, and Duke Energy's Oconee Unit 1 are acceptable for implementation. The methodology in WCAP-16168-NP-A Revision 2 is applicable to Waterford 3 by confirmation of the applicability of the parameters in Appendix A of WCAP-16168-NP-A, Revision 2 on a plant specific basis. This extension satisfies the change in risk requirements of Regulatory Guide 1.174 and, in accordance with 10 CFR 50.55a(a)(3)(i), maintains an acceptable level of quality and safety.

Therefore, it is reasonable to conclude that: an extension of Waterford 3's second ISI interval to 2015 and the third ISI interval to 2035 will also achieve an acceptable level of quality and safety. Furthermore, the plant specific information presented in Section IV,

above, provide a qualitative basis that the risk associated with extending the inspection interval is bounded by the risk-informed pilot studies contained in WCAP 16168-NP-A, Revision 2. Based on this, Entergy considers the proposed alternative for the subject examinations at Waterford 3 to provide an acceptable level of quality and safety. Therefore, Entergy requests that the NRC staff approve the proposed alternative pursuant to 10 CFR 50.55a(a)(3)(i).

**ATTACHMENT 1  
To  
W3F1-2008-0060**

**WCAP-16168-NP REVISION 2 NRC SAFETY EVALUATION  
SECTION 3.4 INFORMATION**

**Attachment 1**  
**WCAP-16168-NP Revision 2 NRC Safety Evaluation**  
**Section 3.4 Information**

Plant specific information for the Waterford 3 plant is provided in bold for each of the following five items denoted in section 3.4 of the final safety evaluation for topical report (TR) WCAP-16168-NP, Revision 2, "Risk-Informed Extension of the Reactor Vessel In-Service Inspection Interval," dated May 8, 2008.

- 1) Licensees must demonstrate that the embrittlement of their [reactor vessel] RV is within the envelope used in the supporting analyses. Licensees must provide the 95<sup>th</sup> percentile [through wall cracking frequency]  $TWCF_{TOTAL}$  and its supporting material properties at the end of the period in which the relief is requested to extend the inspection interval from 10 to 20 years. The 95th percentile  $TWCF_{TOTAL}$  must be calculated using the methodology in NUREG-1874. The  $RT_{MAX-X}$  and the shift in the Charpy transition temperature produced by irradiation defined at the 30 ft-lb energy level,  $\Delta T_{30}$ , must be calculated using the latest approved methodology documented in Regulatory Guide 1.99, "Radiation Embrittlement of Reactor Vessel Materials," or other NRC-approved methodology. The [Pressurized Water Reactor Owners Group] PWROG response to [request for additional information] RAI 3 from Reference 3 and Appendix A in the TR identifies the information that is to be submitted.

**Waterford 3's  $TWCF$  calculation was used as a plant implementation example in Appendix A-2 of WCAP-16168-NP-A Revision 2. Waterford 3's  $TWCF_{95-TOTAL}$  at 60 effective full-power years using the correlations from NUREG-1874 is  $2.87E-14$  events per year. Details of the  $TWCF$  calculation are contained in Enclosure 1, Request for Alternative, Section IV.B, Table 3 of this submittal.**

- 2) Licensees must report whether the frequency of the limiting design basis transients during prior plant operation are less than the frequency of the design basis transients identified in the PWROG fatigue analysis that are considered to significantly contribute to fatigue crack growth.

**The frequency of the limiting design basis transients during prior plant operation for Waterford 3 is 13 heatup and cool-down cycles per year. Data is contained in Enclosure 1, Request for Alternative, Section IV.B, Table 1 of this submittal. On average Waterford 3 has operated with fewer than 13 cycles per year.**

- 3) Licensees must report the results of prior inservice inspection ISI of RV welds and the proposed schedule for the next 20 year ISI interval. The 20 year inspection interval is a maximum interval. In its request for an alternative, each licensee shall identify the years in which future inspections will be performed. The dates provided must be within plus or minus one refueling cycle of the dates identified in the implementation plan provided to the NRC in PWROG letter OG-06-356, "Plan for Plant Specific Implementation of Extended Inservice Inspection Interval per WCAP 16168-NP, Revision 1, 'Risk Informed Extension of the Reactor Vessel In-Service Inspection Interval,' MUHP 5097-99, Task 2059," dated October 31, 2006 (Reference 10).

**Attachment 1**  
**WCAP-16168-NP Revision 2 NRC Safety Evaluation**  
**Section 3.4 Information**

**Results of prior ISI of RV examination categories B-A and B-D welds are included in Enclosure 1, Request for Alternative, Section IV.B, Table 2 of this submittal. Future inspection scheduling is also discussed in this table.**

- 4) Licensees with B&W plants must (a) verify that the fatigue crack growth of 12 heatup/cool-down transients per year that was used in the PWROG fatigue analysis bound the fatigue crack growth for all of its design basis transients and (b) identify the design bases transients that contribute to significant fatigue crack growth.

**Not applicable since Waterford 3 is a Combustion Engineering plant.**

- 5) Licensees with RVs having forgings that are susceptible to underclad cracking and with  $RT_{MAX-FO}$  values exceeding 240°F must submit a plant-specific evaluation to extend the inspection interval for ASME Code, Section XI, Category B-A and B-D RV welds from 10 to a maximum of 20 years because the analyses performed in the TR are not [be] applicable.

**Not applicable since Waterford 3  $RT_{MAX-FO}$  value indicates not applicable as included in Enclosure 1, Request for Alternative, Section IV.B, Table 3 of this submittal.**

**Enclosure 2  
To  
W3F1-2008-0060**

**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
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Entergy will extend the second 10-year inservice inspection interval from 10 years to 20 years for the Examination Category B-A and B-D reactor vessel welds and perform the Waterford 3 inspection in the 2015 refueling outage plus or minus one refueling cycle.	✓		2015 refueling outage plus or minus one refueling cycle
Entergy will perform the second 10-year inservice inspection of the Examination Category B-J welds associated with the reactor vessel during the Waterford 3 Fall 2009 refueling outage.	✓		Fall 2009 refueling outage (RF16)