



Entergy Nuclear South
Entergy Operations, Inc.
17265 River Road
Killona, LA 70057-3093
Tel 504 739 6715
Fax 504 739 6698
rmurill@entergy.com

Robert J. Murillo
Licensing Manager
Waterford 3

W3F1-2008-0064

September 23, 2008

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

Subject: Response to Request for Additional Information regarding Generic Letter (GL) 2008-01 Proposed Alternative Course of Action and Request for a Revised 3-Month Response Letter
Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

Dear Sir or Madam:

By letter dated May 12, 2008, Entergy Operations, Inc (Entergy) provided the 3 month response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling Decay Heat Removal, and Containment Spray Systems." On September 9, 2008, the NRC issued a request for additional information (RAI) related to the response to the Generic Letter. Attachment 1 of this letter provides the requested response to the RAI.

New commitments contained in this submittal are summarized in Attachment 2.

Please contact Mr. Robert J. Murillo, Manager, Licensing at (504) 739-6715 if there are any questions concerning this matter.

Sincerely,

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

RJM/GCS/ssf

- Attachment(s):
1. Response to Request for Additional Information regarding Generic Letter (GL) 2008-01 Proposed Alternative Course of Action and Request for a Revised 3-Month Response Letter
 2. List of Regulatory Commitments

A134
NER

cc: Mr. Elmo E. Collins, Jr.
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
612 E. Lamar Blvd., Suite 400
Arlington, TX 76011-4125

NRC Senior Resident Inspector
Waterford Steam Electric Station Unit 3
P.O. Box 822
Killona, LA 70066-0751

U. S. Nuclear Regulatory Commission
Attn: Mr. N. Kalyanam
Mail Stop O-07D1
Washington, DC 20555-0001

Wise, Carter, Child & Caraway
ATTN: J. Smith
P.O. Box 651
Jackson, MS 39205

Winston & Strawn
ATTN: N.S. Reynolds
1700 K Street, NW
Washington, DC 20006-3817

Morgan, Lewis & Bockius LLP
ATTN: T.C. Poindexter
1111 Pennsylvania Avenue, NW
Washington, DC 20004

Attachment 1

W3F1-2008-0064

**Response to Request for Additional Information regarding Generic Letter (GL) 2008-01
Proposed Alternative Course of Action and Request for a Revised 3-Month
Response Letter**

**Response to Request for Additional Information regarding Generic Letter (GL)
2008-01 Proposed Alternative Course of Action and Request for a Revised 3-Month
Response Letter**

In the RAI dated September 9, 2008, the NRC provided the following assessment to Entergy's Waterford 3 Steam Electric Station 3 month response to Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling Decay Heat Removal, and Containment Spray Systems."

NRC Assessment

The NRC staff finds that the stated reasons for why it [Entergy] 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 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 licensee 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.

Entergy's Response

In Entergy's response to Generic Letter 2008-01, dated May 12, 2008, the following commitments were made:

Perform the walkdowns and complete the evaluations of the accessible portions of the GL systems by October 11, 2008.

Complete the walkdown of the inaccessible portions of the systems during the next refueling outage that is planned for November 2009 and complete the evaluations these portions of the systems by January 30, 2010.

Submit the GL 2008-01 requested information to the NRC by March 31, 2010.

These commitments have been revised to address this RAI and will now read as follows:

For the portions of the subject systems, as described in letter W3F1-2008-0032, that are accessible prior to the next refueling outage that is planned to start in October 2009 at Waterford 3, Entergy will provide all GL requested information to the NRC by October 11, 2008.

Except for the long-term items, as described in letter W3F1-2008-0032, Entergy will 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 to start in October 2009 at Waterford 3.

Entergy will ensure that the responses provide the following information, as requested in the original Generic Letter 2008-01 and the RAI dated September 9, 2008:

- (a) A description of the results of evaluations that were performed. The description will provide sufficient information to demonstrate compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems; as described in letter W3F1-2008-0032; and

- (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that are determined necessary to assure compliance with these regulations; and,
- (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for the schedule; and,
- (d) Entergy will address how it plans to track long term actions, such as the need to perform pump testing to determine 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.

Attachment 2

W3F1-2008-0064]

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 | |
| For the portions of the subject systems, as described in letter W3F1-2008-0032, that are accessible prior to the next refueling outage that is planned to start in October 2009 at Waterford 3, Entergy will provide all GL requested information to the NRC by October 11, 2008. | x | | October 11, 2008 |
| Except for the long-term items, as described in letter W3F1-2008-0032, Entergy will 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 scheduled to start in October 2009 at Waterford 3. | x | | Within 90 days following startup from the next refueling outage that is planned to start in October 2009 at Waterford 3. |