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W3F1-2009-0066

November 25, 2009

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

Subject: Clarification of Response to Generic Letter 2007-01 Question 2  
Waterford Steam Electric Station, Unit 3  
Docket No. 50-382  
License No. NFP-38

- References:
1. NRC Generic Letter 2007-01, Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients, dated February 7, 2007
  2. Waterford Steam Electric Station, Unit 3, response to Generic Letter 2007-01, dated May 3, 2007 (W3F1-2007-0017)
  3. NRC Inspection Report, dated November 2, 2009, Waterford Steam Electric Station, Unit 3 – NRC Component Design Bases Inspection Report 05000382/20090099

Dear Sir or Madam:

In Reference 1, the NRC requested that facilities submit the following information to the NRC within 90 days of the date of the Generic Letter:

Describe inspection, testing, and monitoring programs to detect the degradation of inaccessible or underground power cables that support emergency diesel generators, offsite power, essential service water, service water, component cooling water, and other systems that are within the scope of 10CFR50.65 (the maintenance rule).

In Reference 2, Waterford 3 responded to this request as follows: "Waterford 3 inspection, testing and monitoring practices presently include visual cable inspection during meggering of cables and connected equipment during maintenance activities. Plant condition reporting is used to determine root cause and extent of conditions and would be the process for determining the need for and the extent of any increased cable monitoring."

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The Waterford 3 response to this Generic Letter request has been viewed by the NRC as lacking clarity as documented in NRC Inspection Report No. 05000382/2009009 (Reference 3). This condition was documented in the Waterford 3 Corrective Action Program as Condition Report CR-WF3-2009-04935.

This correspondence clarifies the intent of the Waterford 3 initial response to the Generic Letter. The Waterford 3 initial response was not intended to describe any "formal" process or program, but rather was a statement of generic practices employed during maintenance activities. The initial response was intended to communicate the fact that any cable failures or degradation identified during routine maintenance or observation is expected to be entered into the corrective action program. The visual inspection referred to in the initial response to the Generic Letter was referring to the approximate two foot section of cable in the switchgear that the megger equipment was connected to during the test. The visual inspections referred to in the initial response were not intended to mean end to end cable inspections. The Waterford 3 current practices regarding submerged cables are consistent with the above clarifying statements.

There are no regulatory commitments contained in this letter.

Please contact me or Robert J. Murillo at 504-739-6715, Manager, Licensing should you have any questions.

This information is being provided pursuant the requirements of 10CFR50.54(f). I declare under the penalty of perjury that the foregoing information is true and correct. Executed on November 25, 2009.

Sincerely,

A handwritten signature in black ink, appearing to be 'JAK/PRR', written in a cursive style.

JAK/PRR

cc: Mr. Elmo E. Collins, Jr.  
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