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Robert J. Murillo
Licensing Manager
Waterford 3

W3F1-2010-0026

April 7, 2010

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

SUBJECT: Commitment Change Associated with Reactor Vessel Internals
Degradation Management Program
Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

REFERENCE: 1. Entergy Letter dated February 5, 2005, "Supplement to Amendment
Request NPF-38-249 Extended Power Uprate"

Dear Sir or Madam:

This letter is to notify the NRC of a change to a commitment of record made in the reference letter. The fundamental change affects the schedule for submitting a description of a reactor vessel internals degradation management program to the NRC for review and approval. The current commitment of record requires submittal of the plan by June 10, 2010, which is within five years from the date of issuance of the uprated license. The revised commitment will require submittal of the plan by December 31, 2011.

By letter (Reference 1), Entergy Operations, Inc. (Entergy) made the following commitment:

Entergy Operations, Inc (Entergy) is currently an active participant in the Electric Power Research Institute (EPRI) Materials Reliability Program (MRP) research initiatives on aging related degradation of reactor vessel internal components. Entergy commits to:

- a. continue its active participation in the MRP initiative to determine appropriate reactor vessel internals degradation management programs,
- b. evaluate the recommendations resulting from this initiative and implement a reactor vessel internals degradation management program applicable to Waterford 3,
- c. incorporate the resulting reactor vessel internals inspections into the Waterford 3 augmented inspection plan as appropriate.

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In addition, as requested by the NRC, a description of the program, including the inspection plan, will be submitted to the NRC for review and approval. The submittal date will be within 24 months after the final EPRI MRP recommendations are issued or within five years from the date of issuance of the uprated license, whichever comes first.

The Materials Reliability Program, Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MRP-227-Rev. 0) final report was issued in December 2008. This document contains Mandatory, Needed and Good Practice elements as defined in the Implementation Protocol of NEI 03-08 and is required for all operating commercial U.S. Pressurized Water Reactors (PWRs). The Mandatory element is that each commercial U.S. PWR unit shall develop and document a PWR reactor internals aging management program (AMP) within thirty-six months following issuance of MRP-227-Rev. 0. With this requirement, the due date for the U.S. PWRs to document their aging management programs will be December 2011.

Waterford 3 is a Combustion Engineering (CE) Pressurized Water Reactor and has been in operation since 1985. Waterford 3's current license period is 40 years and is due to expire in 2025. Per MRP-227-Rev. 0, table 4-2, "CE Plants Primary Components," the frequency of examinations for Waterford 3's components would occur no later than two refueling outages from the beginning of the license renewal period. With this requirement, the earliest Waterford 3 would be required to complete the examinations would be approximately 2026. Entergy Plans to seek license renewal in 2025.

Waterford 3 is informing the NRC that Waterford 3 intends to follow the Mandatory element of MRP-227-Rev. 0 that each commercial U.S. PWR unit shall develop and document a PWR reactor internals aging management program (AMP) within thirty-six months following issuance of MRP-227-Rev. 0 (December 31, 2011). Waterford will submit a description of the program, including the inspection plan, to the NRC for review and approval prior to December 31, 2011. Since no examinations would need to be completed prior to two refueling outages from the beginning of the license renewal period, this change in the commitment will affect administrative requirements only and will not adversely impact the safety provisions of the commitment.

This letter contains no new commitments and one revised commitment as summarized in Attachment 1.

If you have any questions or require additional information, please contact Robert J. Murillo, Licensing Manager at (504) 739-6715.

Sincerely,


RJM/RJP/ssf

Attachment:

cc: Mr. Elmo E. Collins, Jr.
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
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NRC Senior Resident Inspector
Waterford 3
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Killona, LA 70066-0751

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Louisiana Department of Environmental Quality
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American Nuclear Insurers
Attn: Library
Town Center Suite 300S
29th S. Main Street
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Attachment 1

To

W3F1-2010-0026

Revised Regulatory Commitment

Revised Regulatory Commitment

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	
<p>Entergy Operations, Inc (Entergy) is currently an active participant in the Electric Power Research Institute (EPRI) Materials Reliability Program (MRP) research initiatives on aging related degradation of reactor vessel internal components. Entergy commits to:</p> <ul style="list-style-type: none"> a. continue its active participation in the MRP initiative to determine appropriate reactor vessel internals degradation management programs, b. evaluate the recommendations resulting from this initiative and implement a reactor vessel internals degradation management program applicable to Waterford 3, c. incorporate the resulting reactor vessel internals inspections into the Waterford 3 augmented inspection plan as appropriate. <p>A description of the program, including the inspection plan, will be submitted to the NRC for review and approval. The submittal date will be prior to December 31, 2011.</p>	X		December 31, 2011