

**Notes for Proposed Corrections to NRC Safety Evaluation Dated January 4, 2012  
for Waterford Alternative to ASME IWE-5221 (TAC No. ME6795)**

On page 5 and 6 of the subject Safety Evaluation dated January 4, 2012; several statements were made that are not consistent with the requested information in Waterford 3 Request for Alternative to ASME IWE-5521 dated July 27, 2011 or the Waterford 3 containment design. The following notes provide further explanation of the proposed changes to the NRC Safety Evaluation.

- Note 1: [Page 5, 1<sup>st</sup> and 2<sup>nd</sup> Paragraphs] The Waterford 3 SCV design contains a torispherical welded hatch that is a part of the SCV. The NRC SE infers that Entergy will be removing “sections” of the containment versus cutting the preexisting weld for the hatch.
- Note 2: [Page 6, 1<sup>st</sup> sentence at top of page] As stated by the NRC, the original Construction Code of Record for Waterford 3 is the 1971 Edition, Summer 1971 Addenda. However, Entergy plans to perform repairs to the Class MC steel containment vessel in accordance with a later Edition of Section III which will be reconciled to original Construction Code in accordance with IWA-4200. This is noted at the top of Page 3 of 4 of the Waterford 3 proposed alternative.
- Note 3: [Page 6, 2<sup>nd</sup> sentence at top of page] Entergy does not propose to perform a surface examination (MT or PT) of the weld prep area. As discussed in the second paragraph under Section VI. “Precedent” on Page 4 of 4, the weld thickness at the repair location is a nominal 1.5 inches. In accordance with paragraph IWA-4653 of ASME Section XI and paragraph NE-5130 of ASME Section III, only those weld repairs that are 2 inches or greater in thickness require a surface examination prior to performing the weld repair. A 100% radiograph of the weld area will ensure the integrity of the welded area.
- Note 4: [Page 6, 3<sup>rd</sup> paragraph, items (3) and (4)] The discussion provided regarding the 1 hour hold time for a concrete containment and performing visual examinations in accordance with IWL of Section XI is not applicable to Waterford 3. The Waterford 3 containment is a free standing steel vessel which complies with the requirements of Section III, Class MC Components. ASME Section XI, IWL is only applicable to concrete containments as defined by ASME Section II, CC-1000. The Waterford 3 concrete shield building does not meet this definition. The inclusion of discussion for complying with IWL and a 1 hour hold time tends to add confusion to the requirements that Waterford 3 should meet and should be removed.
- Note 5: [Page 6, 3<sup>rd</sup> paragraph, item (4)] Entergy agrees that a visual examination of the Waterford steel containment vessel will be performed under the requirements ASME Section XI, IWE-2310(d) and IWE-5240. However, the visual examination is only applicable to areas affected by the repair/replacement activities. Entergy proposes that the NRC staff clarify the examination requirements to only be applicable to the “affected areas” of the inside and outside surfaces of the repaired steel vessel.