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**Michael E. Mason**  
Licensing Manager, Acting  
Waterford 3

W3F1-2012-0078

September 24, 2012

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

Subject: Resolution of NRC GL 96-05 for Valves Outside the Scope of the Joint Owners' Group (JOG) Periodic Verification Program for MOVs Waterford Steam Electric Station, Unit 3  
Docket No. 50-382  
License No. NPF-38

- References:
1. CNRO-99/00002, "Response to Safety Evaluation-Joint Owners' Group on Periodic Verification of Motor-Operated Valves (in response to Generic Letter 96-05), dated January 11, 1999
  2. Safety Evaluation on Joint Owners' Group Program on Periodic Verification of Motor Operated Valves Described in Topical Report NEDC-32719 (Revision 2), dated October 30, 1997
  3. Final Safety Evaluation on Joint Owner's Group Program on Motor-Operated Valve Periodic Verification Program (TAC NOS. MC2346, MC2347, and MC2348), dated September 25, 2006

Dear Sir or Madam:

In Reference 1, Entergy's Waterford Steam Electric Station, Unit 3 (Waterford 3) informed the NRC of Waterford 3's intent to follow the Joint Owners' Group (JOG) periodic verification program for MOVs as outlined in Topical Report NEDC-32719, Revision 2 (Reference 2). In Reference 2, the NRC issued the Safety Evaluation stating that the Staff considers the JOG Program on MOV periodic verification as an acceptable industry-wide response to Generic Letter 96-05, with conditions described in the Safety Evaluation. The results of the JOG program were reviewed and approved by the NRC in a Final Safety Evaluation, dated September 25, 2006 (Reference 3). The Final Safety Evaluation in Reference 3 accepted the JOG proposed six years implementation schedule. The NRC expected licensees to notify the NRC of deviations from the JOG program (including the implementation schedule) in accordance with the commitments made in response to GL 96-05, including the periodic verification of the design basis capability of JOG Class D valves.

By this letter, Entergy notifies the NRC that Waterford 3 has implemented the JOG program for all Class A, B, C, and D valves except for those valves identified in Attachment 1. The periodic verification of the design basis capability of the JOG Class D valves identified in Attachment 1 will be accomplished using the indicated alternative testing.

This method of periodic verification complies with the intent of the NRC requirement to ensure design basis capability of the valve to perform its safety function and follows NRC guidance described in the Safety Evaluations (References 2 and 3).

One regulatory commitment is identified in Attachment 2. Should you have any questions or require additional information, please contact the acting Licensing Manager, Michael E. Mason, at (504) 739-6673.

Sincerely,

A handwritten signature in black ink that reads "Michael E. Mason". The signature is written in a cursive style with a large, sweeping initial "M".

MEM/RJP

- Attachments:
1. Valves Subject to Alternative Testing (1 page)
  2. Regulatory Commitments (1 page)

cc: Mr. Elmo E. Collins, Jr. RidsRgn4MailCenter@nrc.gov  
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U. S. Nuclear Regulatory Commission Kaly.Kalyanam@nrc.gov  
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Attachment 1 to Entergy letter No. W3F1-2012-0078

Valves Subject to Alternative Testing

<b>Valve No.</b>	<b>Safety Function</b>	<b>Alternative Testing Method</b>	<b>Frequency</b>
SI MVAAA407A	Reactor Coolant LOOP 2 Shut Down Cooling (SDC) Suction Outside Containment Isolation	Differential Pressure Testing	As required to monitor the degradation of the SDC MOV
SI MVAAA407B	Reactor Coolant LOOP 1 Shut Down Cooling (SDC) Suction Outside Containment Isolation	Differential Pressure Testing	As required to monitor the degradation of the SDC MOV

Regulatory Commitments

This table identifies actions discussed in this letter for which Entergy commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are not commitments.

<b>COMMITMENT</b>	<b>TYPE (Check one)</b>		<b>SCHEDULED COMPLETION DATE (If Required)</b>
	<b>ONE-TIME ACTION</b>	<b>CONTINUING COMPLIANCE</b>	
Differential Pressure Testing will be performed for SI MVAAA407A and SI MVAAA407B as required to monitor the degradation of these SDC MOVs as part of the Waterford 3 periodic verification program for MOVs implemented in response to GL 96-05.		<b>X</b>	<b>NA</b>