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Waterford 3

W3F1-2012-0093

October 26, 2012

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

Subject: Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049) Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

- References:
1. NRC Order Number EA-12-049, *Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, dated March 12, 2012 (ADAMS Accession Number ML12054A735)
 2. NRC Interim Staff Guidance JLD-ISG-2012-01, *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0*, dated August 29, 2012 (ADAMS Accession Number ML12229A174)
 3. Nuclear Energy Institute (NEI) Letter to NRC, *Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX)*, dated February 24, 2012
 4. NEI 12-06, *Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0*, dated August 2012

Dear Sir or Madam:

On March 12, 2012, the NRC issued an order (Reference 1) to Waterford Steam Electric Station, Unit 3 (Waterford 3). Reference 1 was immediately effective and directs Waterford 3 to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 29, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms that Waterford 3 has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources are being identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None at this time

Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for Waterford 3 prior to startup from refueling outage RF-20 (Fall 2015).

There are no new commitments contained in this submittal. Please contact Michael Mason, Licensing Manager (acting), at (504) 739-6673 if you have questions regarding this information.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 26, 2012.

Sincerely,



DJ/WH

cc: Director, Office of Nuclear Reactor Regulation
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