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W3F1-2014-0019

February 28, 2014

Mr. Kriss M. Kennedy, Director
Division of Reactor Projects, Region IV
U.S. Nuclear Regulatory Commission
Kriss.Kennedy@nrc.gov

Subject: Entergy Position on the Preliminary White Finding in NRC Inspection Report
05000382/2013008
Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

- References:
1. NRC letter from Mr. Kriss Kennedy to Mr. Michael Chisum, dated January 30, 2014, titled "Waterford Steam Electric Station, Unit 3 – NRC Inspection Report 05000382/2013008; Preliminary White Finding"
 2. Entergy letter W3F1-2014-0011, Entergy Intentions for Submitting a Written Position on the Preliminary White Finding in NRC Inspection Report 05000382/2013008, dated February 6, 2014.

Dear Mr. Kennedy:

In reference 2, it was indicated that Waterford Steam Electric Station, Unit 3 (Waterford 3) contacted Mr. Greg Werner on February 6, 2014 to communicate our intention to provide a written response within 30 days of our receipt of reference 1 and that a regulatory conference was not being requested.

By this correspondence, Waterford 3 is providing the written response describing our position on the finding presented in reference 1.

A review of the information describing the preliminary white finding in reference 1 has resulted in no concerns with its characterization or conclusions. It is well documented and has sufficient information for Waterford 3 to address and correct the described issues.

The importance the Emergency Diesel Generators have on reactor safety is understood, and corrective actions have been aggressively pursued to address the identified condition. Several of the actions that have been taken to date include:

- A root cause analysis was completed under CR-WF3-2013-2530 that identified the root cause as "the importance of monitoring EDG Exhaust fan differential pressure was not previously recognized."

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- Replaced the Emergency Diesel Generator (EDG) 'B' Exhaust Fan Hub Assembly and restored the fan to an operable condition.
- An evaluation for a similar condition on the EDG 'A' Exhaust Fan Hub Assembly determined that maintenance had not been performed on the 'A' fan.
- Operations procedure OP-009-002, Emergency Diesel Generator was revised to monitor LO FLOW computer points for fan differential pressure during EDG operation in the EDG running log. This will monitor for proper fan operation throughout the EDG run.
- Revised the Preventative Maintenance Optimization (PMO) classification of the EDG room exhaust fan differential pressure switches from "run-to-failure" to "non-critical" that supported creation of a Preventative Maintenance task with a 6 year frequency to calibrate the switches.
- Since installing additional set screws was a key contributor to the hub failure, a search for changes involving setscrews for the past 15 years was performed to determine if there were any similar issues. None were identified.
- A Lesson Learned was developed and distributed to Operations and Engineering stressing the importance of applying a questioning attitude regarding status of plant equipment and understanding indications when performing routine evolutions.
- This condition was shared as operating experience with the nuclear industry via submittal of INPO ICES record 306464.

Upon receipt of the finding with its final characterization, Waterford 3 plans to revisit the corrective action activities taken to date to ensure all aspects of the finding have been adequately addressed.

There are no new commitments contained in this submittal.

If you have any questions, please contact the Regulatory Assurance Manager, John P. Jarrell, at 504.739.6685.

Sincerely,



JPJ/RJP

cc: U.S. Nuclear Regulatory Commission
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