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Waterford 3

W3F1-2015-0004

February 26, 2015

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

SUBJECT: Fourth Six Month Status Report for Implementation of Order EA-12-051,
Commission Order Modifying License With Regard To Reliable Spent Fuel
Pool Instrumentation
Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

- References:**
1. NRC Order Number EA-12-051, "Order to Modify Licenses with Regard to Reliable Spent Fuel Pool (SFP) Instrumentation," dated March 12, 2012 (ADAMS Accession No. ML12054A682)
 2. NRC Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable SFP Instrumentation," Revision 0, dated August 29, 2012 (ADAMS Accession No. ML12221A339)
 3. Nuclear Energy Institute (NEI) 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, To Modify Licenses with Regard to Reliable SFP Instrumentation," Revision 1, dated August 2012 (ADAMS Accession No. ML12240A307)
 4. Entergy letter to NRC, "Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Reliable SFP Instrumentation (Order Number EA-12-051)," dated October 26, 2012 (ADAMS Accession No. ML12300A446)
 5. Waterford Steam Electric Station, Unit 3, letter to NRC, "Overall Integrated Plan in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated February 28, 2013 (ADAMS Accession No. ML13063A263).

6. Waterford Steam Electric Station, Unit 3 letter to NRC, "First Six Month Status Report for Implementation of Order EA-12-051, Commission Order Modifying License With Regard To Reliable Spent Fuel Pool Instrumentation" dated August 28, 2013 (ADAMS Accession No. ML13241A280)
7. Waterford Steam Electric Station, Unit 3 letter to NRC, "Second Six Month Status Report for Implementation of Order EA-12-051, Commission Order Modifying License With Regard To Reliable Spent Fuel Pool Instrumentation" dated February 28, 2014 (ADAMS Accession No. ML14059A087)
8. Waterford Steam Electric Station, Unit 3 letter to NRC, "Third Six Month Status Report for Implementation of Order EA-12-051, Commission Order Modifying License With Regard To Reliable Spent Fuel Pool Instrumentation" dated August 28, 2014 (ADAMS Accession No. ML14247A294)

Dear Sir or Madam:

On March 12, 2012, the NRC issued NRC Order EA-12-051 (Reference 1) to Entergy Operations, Inc. (Entergy). The Order (Reference 1) was immediately effective and directs Waterford Steam Electric Station, Unit 3 (Waterford 3), to have a reliable indication of the water level in associated spent fuel storage pools.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an Overall Integrated Plan (OIP). Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3). Reference 4 provided the initial status report regarding SFP instrumentation, and Reference 5 provided the OIP.

NRC Order EA-12-051 requires submission of a status report at six-month intervals following submittal of the Overall Integrated Plan with regard to the requirements for reliable spent fuel pool instrumentation for Waterford 3. References 6, 7, and 8 provided the first, second, and third six-month status reports for Waterford 3, respectively. The purpose of this letter is to provide, as an attachment, the fourth six month status report for the implementation of Order EA-12-051.

There are no new commitments identified in this submittal. Should you have any questions concerning the content of this letter, please contact John Jarrell, Regulatory Assurance Manager, at (504) 739-6685.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 26, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read "MRC/AJH", written in a cursive style.

MRC/AJH

Attachment: Waterford Steam Electric Station, Unit 3, Fourth Six Month Status Report for the Implementation of Order EA-12-051, Order Modifying Licenses with Regard to the Requirements for Reliable Spent Fuel Pool Instrumentation

cc: Attn: Director, Office of Nuclear Reactor Regulation
U. S. NRC
RidsNrrMailCenter@nrc.gov

Mr. Mark L. Dapas, Regional Administrator
U. S. NRC, Region IV
RidsRgn4MailCenter@nrc.gov

NRC Project Manager for Waterford 3
Michael.Orenak@nrc.gov

NRC Senior Resident Inspector for Waterford 3
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Attachment

W3F1-2015-0004

**Waterford Steam Electric Station, Unit 3,
Fourth Six Month Status Report for the Implementation of Order EA-12-051,
Order Modifying Licenses with Regard to the Requirements for
Reliable Spent Fuel Pool Instrumentation**

**Waterford Steam Electric Station, Unit 3,
Fourth Six Month Status Report for the Implementation of Order EA-12-051,
Order Modifying Licenses with Regard to the Requirements for
Reliable Spent Fuel Pool Instrumentation**

1 Introduction

Waterford Steam Electric Station, Unit 3 (Waterford 3), developed an Overall Integrated Plan (Reference 1 in Section 8) documenting the requirements to install reliable spent fuel pool level instrumentation (SFP LI) in response to NRC Order EA-12-051 (Reference 2). This attachment provides a planned update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since July 31, 2014 and are current as of January 31, 2015.

- Third Six-Month Status Report — August 2014
- Fourth Six-Month Status Report — Complete with submission of this document in February 2015
- Design Engineering – Completed

3 Milestone Schedule Status

The following provides an update to the milestone schedule to support the Overall Integrated Plan (Reference 1). This section provides the activity status of each item, and the expected completion date noting any change. The dates are planning dates subject to change as design and implementation details are developed.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct 2012	Complete	N/A
Submit Overall Integrated Plan	Feb 2013	Complete	N/A
Submit 6 Month Updates:			
Update 1	Aug 2013	Complete	N/A
Update 2	Feb 2014	Complete	N/A
Update 3	Aug 2014	Complete	N/A
Update 4	Feb 2015	Complete	N/A
Update 5	Aug 2015	Not Started	No Change
Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Modifications:			
Engineering and Implementation			
Design Engineering	Oct 2014	Complete	N/A
Implementation Outage	Nov 2015	Not Started	No Change
Procedures:			
Create Procedures	Nov 2015	In Progress	No Change
Training:			
Develop Training Plan	May 2015	Not Started	No Change
Implement Training	Nov 2015	Not Started	No Change
Submit Completion Report:	Feb 2016	Not Started	No Change
Respond to NRC ISE RAIs	March 2015	In Progress	No Change

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 1).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

Waterford 3 expects to comply with the order implementation date and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Interim Staff Evaluation

Waterford 3 has received an Interim Staff Evaluation that includes 18 RAIs. Responses to the RAIs are due March 31, 2015. The following table provides a status of any RAIs documented in the Interim Staff Evaluation.

RAI #	Response Status
1	To be uploaded to ePortal by 3/31/15
2	To be uploaded to ePortal by 3/31/15
3	To be uploaded to ePortal by 3/31/15
4	To be uploaded to ePortal by 3/31/15
5	To be uploaded to ePortal by 3/31/15
6	To be uploaded to ePortal by 3/31/15
7	To be uploaded to ePortal by 3/31/15
8	To be uploaded to ePortal by 3/31/15
9	To be uploaded to ePortal by 3/31/15
10	To be uploaded to ePortal by 3/31/15
11	To be uploaded to ePortal by 3/31/15
12	To be uploaded to ePortal by 3/31/15
13	To be uploaded to ePortal by 3/31/15
14	To be uploaded to ePortal by 3/31/15
15	To be uploaded to ePortal by 3/31/15
16	To be uploaded to ePortal by 3/31/15
17	To be uploaded to ePortal by 3/31/15
18a	To be uploaded to ePortal by 3/31/15
18b	To be uploaded to ePortal by 3/31/15

7 Potential Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation identified at this time except for those identified in Section 6.

8 References

The following references support the updates to the Overall Integrated Plan described in this Attachment.

1. Waterford Steam Electric Station, Unit 3 letter to NRC, "Overall Integrated Plan in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated February 28, 2013 (ADAMS Accession No. ML13063A263).
2. NRC Order Number EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (ADAMS Accession No. ML12054A682).
3. "Waterford Steam Electric Station, Unit 3 – Interim Staff Evaluation and Request for Additional Information Regarding Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) (TAC No. MF0946)," dated November 25, 2013 (ADAMS Accession No. ML13312A787).
4. "November 26, 2013, Public Meeting Summary for the Discussion Between the NRC Staff and Industry Concerning Responses to Staff Interim Evaluations for Spent Fuel Pool Instrumentation," dated December 26, 2013 (ADAMS Accession No. ML13347B030).