UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 13, 2015

Vice President, Operations
Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3
17265 River Road
Killona, LA 70057-3093

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 – REQUEST FOR ADDITIONAL INFORMATION REGARDING THE REQUEST TO PERMANENTLY EXTEND THE INTEGRATED LEAK RATE TEST FREQUENCY TO 15 YEARS (TAC NO. MF4727)

Dear Sir or Madam:

By letter dated August 28, 2014 (Agencywide Documents Access and Management System Accession No. ML14241A305), Entergy Operations, Inc., submitted a license amendment request (LAR) for Waterford Steam Electric Station, Unit 3, to change Technical Specification 6.15, "Containment Leakage Rate Testing Program," to allow a permanent extension of the Type A primary containment integrated leak rate test frequency from 10 years to 15 years.

The U.S. Nuclear Regulatory Commission staff has reviewed the LAR and has determined that additional information is needed to complete the review. Please provide the additional information requested in the enclosure within 30 days of receipt of this letter.

If you have any questions, please contact me at 301-415-3229 or via e-mail at Michael.Orenak@nrc.gov.

Sincerely,

Michael D. Orenak, Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure:
Request for Additional Information

cc w/encl: Distribution via Listserv

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

REQUEST FOR ADDITIONAL INFORMATION

REGARDING THE LICENSE AMENDMENT REQUEST TO PERMANENTLY EXTEND THE INTEGRATED LEAK RATE TEST FREQUENCY TO 15 YEARS

ENTERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

By letter dated August 28, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14241A305), Entergy Operations, Inc., submitted a license amendment request (LAR) to change Technical Specification 6.15, "Containment Leakage Rate Testing Program," for the Waterford Steam Electric Station, Unit 3. The proposed change would allow a permanent extension of the Type A primary containment integrated leak rate test frequency from 10 years to 15 years.

By letter dated February 18, 2015 (ADAMS Accession No. ML15033A422), the U.S. Nuclear Regulatory Commission (NRC) staff requested that additional information be provided to complete the review of the LAR. After further review, the NRC staff requests the following additional information.

RAI 13

According to Section 9.2.3 of the Nuclear Energy Institute (NEI) 94-01 Revision 2-A, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50 [Title 10 of the *Code of Federal Regulations* Part 50], Appendix J," dated October, 2008 (ADAMS Accession No. ML100620847), please provide the following information for Type A tests conducted on May 12, 1991 and May 21, 2005:

a) As–left minimum pathway leakage rate (MNPLR) for all Type B and Type C pathways that were in service, isolated, or not lined up in their test position (i.e., drained and vented to containment atmosphere) prior to performing the Type A test;

b) List all pathways and associated leakage rates that contribute to MNPLR in item (a);

c) Performance Leakage Rate (PLR) (= UCL+MNPLR) where UCL is the upper confidence limit;

d) Determine if the Type A test meets the performance criterion by showing if, PLR is less than or equal to (≤) 1.0 L_a (allowable leakage rate).

Enclosure

Please note that during the above performance determination, the following process must be followed, as quoted from Section 9.2.3 of NEI 94-01, Revision 2-A:

> "In addition, leakage pathways that were isolated during performance of the test because of excessive leakage must be factored into the performance determination. If the pathway leakage can be determined by a local leakage rate test, the as–left MNPLR for that leakage path must also be added to the Type A UCL. If the pathway leakage cannot be determined by local leakage rate testing, the performance criteria for the Type A test are not met. If an excessively leaking containment penetration barrier pathway is discovered during the Type A test, and the pathway is neither a Type B or a Type C tested pathway, it shall still be tested to Type B or Type C test requirements after the Type A test and its as-left MNPLR added to the Type [A] test UCL. In this case the Type A test performance criterion is not met unless that pathway is subsequently added to the Type B or Type C test program. If the excessive leakage is from a source that can be tested only during a Type A test, the Type A test performance criterion is not met."

March 13, 2015

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Entergy Operations, Inc.
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If you have any questions, please contact me at 301-415-3229 or via e-mail at Michael.Orenak@nrc.gov.

Sincerely,

/RA/

Michael D. Orenak, Project Manager
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ADAMS Accession No. ML15069A576 ***via memo**

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DATE	3/12/15	3/12/15	3/3/15

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DATE	3/13/15	3/13/15

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