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

October 4, 2015

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

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - RELAXATION OF THE SCHEDULE REQUIREMENTS FOR ORDER EA-12-049, "ISSUANCE OF ORDER TO MODIFY LICENSES WITH REGARD TO REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS" (TAC NO. MF0977)

Dear Mr. Chisum:

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A735), the U.S. Nuclear Regulatory Commission (NRC) ordered Entergy Operations, Inc. (Entergy, the licensee), to take certain actions at Waterford Steam Electric Station, Unit 3 (Waterford), associated with the Fukushima Near-Term Task Force Recommendations. Order EA-12-049 directed that actions be taken by licensees to develop and implement strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities during beyond-design-basis external events (BDBEEs).

Section IV of the order states that licensees proposing to deviate from requirements contained in NRC Order EA-12-049 may request that the Director, Office of Nuclear Reactor Regulation, relax or rescind certain conditions, upon demonstration of good cause. By letter dated August 31, 2015 (ADAMS Accession No. ML15243A243), Entergy submitted a request for an extension of the Order EA-12-049 full compliance date to May 31, 2016, to complete construction and installation of equipment into one of the structures being built for compliance with Order EA-12-049. The licensee's request dated August 31, 2015, indicates that design and installation challenges are causing significant schedule delays.

The licensee's letter dated August 31, 2015, indicates that the strategy chosen to implement the requirements of Order EA-12-049 calls for a fully protected, pre-staged diesel-driven electrical generator. To implement this strategy, a new structure was required to be designed and constructed inside the protected area. The location of this new structure is on top of the Reactor Auxiliary Building, which was chosen, in part, to mitigate a postulated flooding event. The new structure will house a diesel-driven electrical generator, as well as other equipment needed to support the mitigation strategies. The design and construction of the new structure was scheduled to be completed in time to allow installation of the equipment and functionality verification prior to start up from the fall 2015 refueling outage. Due to the location of the new structure on top of an existing plant structure, design and installation challenges are causing significant delays.

To allow completion of the building construction, and the subsequent equipment installation and testing, the licensee requests an extension of the Waterford order implementation date from the completion of the fall 2015 refueling outage to no later than May 31, 2016. The licensee notes that the proposed extension timeframe of December 2015 to May 2016 corresponds to a period during which the occurrence of a major hurricane is not likely.

In light of the facts presented in the licensee's March 26, 2015, letter, the NRC staff has determined that the licensee has demonstrated good cause for relaxation of the order implementation date. The location of the new structure poses unusual construction considerations regarding existing plant structures, systems and components (SSCs) and must be completed in such a manner as to not adversely impact SSCs that are important to plant safety. The NRC staff also considered the December 2015 to May 2016 timeframe of the extension and concluded that the likelihood of a hurricane-based BDBEE is low during this period. Further, the NRC staff notes that following the accident at Fukushima Dai-ichi, the NRC concluded that a sequence of events such as the Fukushima Dai-ichi accident is unlikely to occur in the United States based on the current regulatory requirements and existing plant capabilities. Given the plant-specific circumstances at Waterford, and that completion by the proposed date is before December 2016, the ultimate implementation date established by the order, the NRC staff approves the requested relaxation.

Accordingly, based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the requirement of the order for full order implementation for Waterford is relaxed until May 31, 2016, to allow the licensee sufficient time complete the building construction, equipment installation, and testing needed to fully implement the required strategies.

If you have any questions, please contact Peter Bamford, at 301-415-2833.

Sincerely,

William M. Dean, Director
Office of Nuclear Reactor Regulation

Docket No. 50-382

cc: Listserv

To allow completion of the building construction, and the subsequent equipment installation and testing, the licensee requests an extension of the Waterford order implementation date from the completion of the fall 2015 refueling outage to no later than May 31, 2016. The licensee notes that the proposed extension timeframe of December 2015 to May 2016 corresponds to a period during which the occurrence of a major hurricane is not likely.

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Sincerely,

/RA/

William M. Dean, Director
Office of Nuclear Reactor Regulation

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