



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

June 28, 2016

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

SUBJECT: PLAN FOR THE AGING MANAGEMENT PROGRAM REGULATORY AUDITS
REGARDING THE WATERFORD STEAM ELECTRIC STATION, UNIT 3
LICENSE RENEWAL APPLICATION REVIEW

Dear Mr. Chisum:

By letter dated March 23, 2016, Entergy Operations, Inc. submitted an application for renewal of operating licenses NPF-38 for Waterford Steam Electric Station, Unit 3. The staff of the U.S. Nuclear Regulatory Commission (NRC or the staff) is reviewing this application in accordance with the guidance in NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants."

The staff plans to conduct aging management program regulatory audits during the weeks of July 11 – 15, 2016, and July 25 – 29, 2016, in accordance with the enclosed regulatory audit plan. If you have any questions, please contact me by telephone at (301) 415-6447 or by e-mail at Phyllis.Clark@nrc.gov.

Sincerely,

/RA/

Phyllis Clark, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure:
As stated

cc w/encl: Listserv

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Letter to M. Chisum from P. Clark date June 28, 2016

SUBJECT: PLAN FOR THE AGING MANAGEMENT PROGRAM REGULATORY AUDITS
REGARDING THE WATERFORD STEAM ELECTRIC STATION, UNIT 3
LICENSE RENEWAL APPLICATION REVIEW

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Audit Plan

Aging Management Program Review for the Waterford Steam Electric Station, Unit 3 License Renewal Application

**Division of License Renewal
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission**

License Renewal Aging Management Program Audit Plan Waterford Steam Electric Station, Unit 3

1. Background

By letter dated March 23, 2016, Entergy Operations, Inc. (the applicant), submitted to the U.S. Nuclear Regulatory Commission (NRC or the staff) its application for renewal of operating license no. NPF-38 for the Waterford Steam Electric Station, Unit 3 (Waterford 3). Waterford 3 requested a renewal of the operating license for an additional 20 years beyond the 40-year current license term, which expires midnight on December 18, 2024. The staff from the Division of License Renewal will lead a regulatory audit to gain a better understanding of the applicant's aging management programs (AMPs), aging management reviews, and associated bases and documentation as applicable.

2. Regulatory Audit Bases

License renewal requirements are specified in Title 10 of the *Code of Federal Regulations* (CFR) Part 54 (10 CFR Part 54), "Requirements for Renewal of Operating Licenses for Nuclear Power Plants." Guidance is provided in NUREG-1800, Rev. 2, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR), dated December 2010, and NUREG-1801, Rev. 2, "Generic Aging Lessons Learned (GALL) Report," dated December 2010.

3. Regulatory Audit Scope

The scope of this regulatory audit is to: (a) examine the applicant's AMPs for Waterford 3; and (b) verify the applicant's claims of consistency with the corresponding GALL Report AMPs. Enhancements to AMPs will be evaluated on a case-by-case basis. Exceptions to the GALL Report AMP elements will be evaluated separately as part of the NRC staff's review of the license renewal application (LRA), and will be documented in the staff's safety evaluation report.

The SRP-LR allows an applicant's LRA to reference its AMPs as being consistent with the AMPs described in the GALL Report. By referencing the GALL Report AMPs in this manner, the applicant is concluding that its AMPs correspond to those AMPs and that no further staff review should be required. If an applicant credits an AMP for being consistent with a GALL Report program, it is incumbent on the applicant to ensure that the plant program contains all of the elements of the referenced GALL Report program. The applicant's determination shall be documented and maintained in an auditable, retrievable form.

During this audit, the staff will audit program elements 1 - 6 (scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, and acceptance criteria), and program element 10 (operating experience), of the applicant's AMPs claimed to be consistent with the GALL Report against the equivalent elements of the associated AMP described in the GALL Report, unless otherwise indicated. Program elements 7 - 9 (corrective actions, confirmation process, and administrative controls) are audited by another NRC project team during the scoping and screening methodology audit, and are evaluated separately. In addition, the staff will verify that the conditions at the plant are bounded by the conditions for which the GALL Report program was evaluated.

The staff will also examine the applicant's program bases documents and related references for these AMPs, perform selected in-plant walkdowns, and interview applicant representatives to obtain additional clarification related to the AMPs.

4. Information and Other Material Necessary for the Regulatory Audit

The project team will review the LRA, the AMP basis documents and other applicant supporting documents as appropriate.

The project team would like for at least one hard-copy set of AMPs, AMP basis documents, and all other relevant documentation to be available in the team's work room.

Work space and team support logistics:

One general team work area with seating and laptop space for 18 people.

Three break-out rooms for question/answer/small group sessions and meetings, so that work in the main room will not be disrupted.

Telephone access for in-plant and/or outside business-related calls. The break-out rooms should also have speaker phone capability for conference calls.

Access to printers for printing out drafts, draft requests for additional information, review comments, schedules, and so on.

Access to a copier for making duplicates for team use, meeting agendas and so on.

5. Team Assignments

NRC staff participation is projected as follows (some deletions, additions or substitutions may occur on an as-needed basis):

Week of July 11, 2016:

Assigned Auditor	Area of Review
Phyllis Clark	Project Manager
Benjamin (Ben) Beasley	Acting Deputy Director
Brian Wittick	Branch Chief
Samuel Cuadrado De Jesus	Structural
Juan Lopez	Structural
Angela R. Buford	Structural
George Thomas	Structural
Andrew Prinaris	Structural
Bryce Lehman	Structural

Assigned Auditor	Area of Review
Cliff K. Doutt	Electrical
Mohammad Saddollah	Electrical
William (Tony) A. Gardner	Mechanical and Materials
Aaron Mink	Mechanical and Materials
Huda Akhavannik	Electrical
Albert Wong	Mechanical and Materials
Alan Huynh	Materials and Chemical
Donald M. Brittner	Operating Experience

Week of July 25, 2016:

Assigned Auditor	Area of Review
Phyllis Clark	Project Manager
Dennis C. Morey	Branch Chief
Bart Fu	Mechanical and Materials
William (Bill) C. Holston	Mechanical and Materials
James Medoff	Mechanical and Materials
James A. Gavula	Mechanical and Materials
Seung Min	Mechanical and Materials
Sarah Obadina	Mechanical and Materials
Brian Alik	Mechanical and Materials
Mark Yoo	Mechanical and Materials
Donald M. Brittner	Operating Experience

6. Logistics

The audit will be conducted on-site during the weeks of **July 11 – 15, 2016** and **July 25 – 29, 2016**. Entrance and exit briefings will be held at the beginning and end of this audit, respectively.

Each week's activities will begin on Monday morning and are normally planned to extend through part of the day Friday. Normally a status briefing should be held at the close of a day's activities to highlight progress and any special issues identified, and to review and/or adjust the schedule for the next day's work.

7. Special Requests

The staff requests the applicant to make available the license renewal application program basis documentation and license renewal drawings (hard copy), and their condition report database (electronic version access) for independent searches by the regulatory audit team. Electronic copies of the Key-word Search Results should be made available for the staff's use while on-site. Applicant personnel responsible for or involved with the various programs should also be available.

8. Deliverables

An audit summary report should be issued to the applicant, normally within 90 days from the end of the audit.