Entergy Operations, Inc.
17265 River Road
Killona, LA 70057-3093
Tel 504-739-6660
Fax 504-739-6698
jdinell@entergy.com

John C. Dinelli
Site Vice President
Waterford 3

W3F1-2018-0035

June 26, 2018

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Supplement to the License Renewal Application for Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

REFERENCES:

1. Entergy letter W3F1-2016-0012 "License Renewal Application, Waterford Steam Electric Station, Unit 3" dated March 23, 2016.
2. NRC Final License Renewal Interim Staff Guidance (LR-ISG-2011-05) "Ongoing Review of Operating Experience" ADAMS ML12044A215.

Dear Sir or Madam:

By letter dated March 23, 2016, Entergy Operations, Inc. (Entergy) submitted a license renewal application (Reference 1).

In 2011 the NRC issued Reference 2 which provides a framework to ensure that a renewed license holder's operating experience (OE) review activities adequately address OE concerning age-related degradation and aging management during the term of the renewed license. Entergy is supplementing the information contained in Appendix A, Section A.1 of Reference 1 to clarify how the Waterford 3 OE review activities address the considerations presented in Reference 2. Enclosure 1.contains the revised LRA Appendix A, Section A.1, with additions underlined.

There are no new regulatory commitments contained in this submittal. If you require additional information, please contact the Regulatory Assurance Manager, John Jarrell, at 504-739-6685.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 26, 2018.

Sincerely,

JCD/AJH

Enclosure: 1. Revised Appendix A, Section A.1 – Waterford 3 License Renewal Application

cc: Kriss Kennedy
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
1600 E. Lamar Blvd.
Arlington, TX 76011-4511
RidsRgn4MailCenter@nrc.gov

NRC Senior Resident Inspector
Waterford Steam Electric Station Unit 3
P.O. Box 822
Killona, LA 70066-0751
Frances.Ramirez@nrc.gov
Chris.Speer@nrc.gov

U. S. Nuclear Regulatory Commission
Attn: Phyllis Clark
Division of License Renewal
Washington, DC 20555-0001
Phyllis.Clark@nrc.gov

U. S. Nuclear Regulatory Commission
Attn: Dr. April Pulvirenti
Washington, DC 20555-0001
April.Pulvirenti@nrc.gov

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Surveillance Division
P.O. Box 4312
Baton Rouge, LA 70821-4312
Ji.Wiley@LA.gov

Enclosure 1 to

W3F1-2018-0035

Revised Appendix A, Section A.1

Waterford 3 License Renewal Application

Revised Appendix A, Section A.1 (additions underlined)

A.1 AGING MANAGEMENT PROGRAMS

The integrated plant assessment for license renewal identified aging management programs necessary to provide reasonable assurance that structures and components subject to aging management review will continue to perform their intended functions consistent with the current licensing basis for the period of extended operation. This section describes the aging management programs and activities required during the period of extended operation. Aging management programs will be implemented prior to entering the period of extended operation.

The corrective action, confirmation process, and administrative controls of the WF3 (10 CFR Part 50, Appendix B) Quality Assurance Program are applicable to all aging management programs and activities during the period of extended operation. WF3 quality assurance (QA) procedures, review and approval processes, and administrative controls are implemented in accordance with the requirements of 10 CFR 50, Appendix B. The WF3 Quality Assurance Program applies to safety-related structures and components. Corrective actions and administrative (document) control for both safety-related and nonsafety-related structures and components are accomplished in accordance with the established WF3 corrective action program and document control program and are applicable to all aging management programs and activities during the period of extended operation. The confirmation process is part of the corrective action program and includes reviews to assure adequacy of corrective actions, tracking and reporting of open corrective actions, and review of corrective action effectiveness. Any follow-up inspection required by the confirmation process is documented in accordance with the corrective action program.

Operating experience from plant-specific and industry sources is identified and systematically reviewed on an ongoing basis. The WF3 corrective action program, which is implemented in accordance with the quality assurance program, effects the documentation and evaluation of plant-specific operating experience. The WF3 operating experience program, which meets the provisions of NUREG-0737, "Clarification of TMI Action Plan Requirements," Item I.C.5, "Procedures for Feedback of Operating Experience to Plant Staff," systematically evaluates industry operating experience. The operating experience program includes active participation in the Institute of Nuclear Power Operations' operating experience program, as endorsed by the NRC.

<u>Codes are used in the corrective action program that provide for the comprehensive identification and categorization of aging-specific issues for plant systems, structures, and components within the scope of license renewal.</u>

In accordance with these programs, site-specific and industry operating experience items are screened to determine whether they involve lessons learned that may impact aging management programs (AMPs). Items are evaluated, and affected AMPs are either enhanced or new AMPs are developed, as appropriate, when it is determined that the effects of aging are not adequately managed. Plant-specific operating experience associated with managing the effects of aging is reported to the industry in accordance with guidelines established in the operating experience review program.

<u>The results of implementing aging management programs (e.g., data from inspections, tests, analyses) are evaluated to determine whether the effects of aging are adequately managed. These evaluations are conducted regardless of whether the acceptance criteria of the particular</u>

AMP have been met. A determination is made as to whether the frequency of future inspections should be adjusted, whether new inspections should be established, and whether the inspection scope should be adjusted. If the effects of aging are not being adequately managed, then a corrective action is entered into the 10 CFR Part 50, Appendix B, program to either enhance the AMP or develop and implement new aging management activities.

Training provided for personnel responsible for submitting, screening, assigning, evaluating, or otherwise processing plant-specific and industry operating experience, as well as for personnel responsible for implementing AMPs, is based on the complexity of the job performance requirements and assigned responsibilities. Training is scheduled on a recurring basis, which accommodates the turnover of plant personnel and the need for new training content.

Revisions to NUREG-1801, "Generic Aging Lessons Learned (GALL) Report" are developed to incorporate lessons learned from LRA reviews and from relevant industry operating experience. For Revision 2, NRC staff reviewed industry operating experience for the period from January 2004 to approximately April 2009 to identify recommended modifications to the GALL Report. The staff from the Division of License Renewal (DLR) analyzed operating experience information during a screening review of domestic operating experience, foreign operating experience from the international Incident Reporting System database, and NRC generic communications. The operating experience review program at WF3 includes review of operating experience from the same domestic and foreign sources and from NRC generic communications. Thus, the WF3 operating experience review program includes the review of operating experience documented within each revision of NUREG-1801.

Evaluation of operating experience related to managing the effects of aging includes the consideration of affected plant systems, structures, and components; materials; environments; aging effects, aging mechanisms; aging management programs (AMPs); and the activities, criteria, and evaluations integral to the aging management programs.