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10 CFR 50.46

W3F1-2020-0068

November 24, 2020

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

Subject: Commitment Change Notification for Generic Safety Issue - 191 and
Generic Letter 2004-02

Waterford Steam Electric Station, Unit 3 (Waterford 3)
NRC Docket No. 50-382
Renewed Facility Operating License No. NPF-38

In Reference 1, the NRC staff recommended three closure options to the Commission for resolving Generic Safety Issue - 191 (GSI-191) and the Commission approved the staff's recommendation to allow Licensees to choose any of the three options to close the issue in Reference 2. On May 16, 2013, Waterford 3 submitted a letter to the NRC (Reference 4) identifying the closure option that Waterford 3 had selected and the associated implementation schedule. In this letter (Reference 4), Waterford 3 made several commitments to achieve closure of GSI-191 and to address Generic Letter (GL) 2004-02.

Subsequently, the Pressurized Water Reactor Owners Group (PWROG) program schedule changed. This resulted in Waterford 3 not being able to meet the original commitment date of June 30, 2015. Based upon the change in the schedule, Waterford 3 revised one of the commitments as documented in Reference 5. Additional revisions were made to the commitments due to the PWROG schedule revisions as documented in Reference 6.

Waterford 3 intends to follow the resolution strategy proposed by the PWROG for establishing in-vessel fiber limits. The PWROG resolution strategy includes testing and analysis as summarized in WCAP-17788-P, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Cold Leg Break (CLB) Evaluation Method for GSI-191 Long-Term Cooling." In the middle of 2019, the NRC informed the PWROG that a Safety Evaluation (SE) would not be issued on WCAP-17788-P. On February 28, 2020, the PWROG approved implementation guidance to support the use of WCAP-17788-P by the PWROG members (Reference 7).

Waterford 3 intends to follow the implementation guidance proposed by the PWROG in Reference 7. Waterford 3 is revising the commitments as documented in Attachment 1. The commitments are revised to align with Reference 7 rather than approval of WCAP-17788.

These commitment changes do not affect the closure option Waterford 3 selected in Reference 4 and will still support successful closure of GL 2004-02.

This letter contains three revised commitments (Attachment 1).

Should you have any questions or require additional information, please contact Paul Wood, Regulatory Assurance Manager, at 504-464-3786.

Respectfully,

Paul Wood

 Digitally signed by Paul Wood
Date: 2020.11.24 14:12:42 -06'00'

Paul Wood

PW/mmz

- References:
- 1) NRC Policy Issue, "Closure Options for Generic Safety Issue - 191, Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance," SECY-12-0093, (ADAMS Accession No. ML121320270), dated July 9, 2012
 - 2) NRC Staff Memorandum, "Staff Requirements - SECY-12-0093 - Closure Options for Generic Safety Issue - 191, Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance," SRM-NRC SECY-12-0093, (ADAMS Accession No. ML12349A378), dated December 14, 2012
 - 3) NRC letter to NEI, "Nuclear Regulatory Commission Review of Generic Safety Issue - 191 Nuclear Energy Institute Revised Schedule for Licensee Submittal of Resolution Path," ADAMS Accession No. ML12326A497, dated November 21, 2012
 - 4) Entergy letter to NRC, "Closure Option for Generic Safety Issue - 191," W3F1-2013-0027, (ADAMS Accession No. ML13137A133), dated May 16, 2013
 - 5) Entergy letter to NRC, "Commitment Change Notification for Generic Safety Issue - 191," W3F1-2015-0050, (ADAMS Accession No. ML15181A393) dated June 30, 2015

- 6) Entergy letter to NRC, "Commitment Change Notification for Generic Safety Issue - 191," W3F1-2016-0089, (ADAMS Accession No. ML16350A459), dated December 15, 2016
- 7) Pressurized Water Reactor Owners Group, "TSTF-567 Implementation Guidance, Evaluation of In-Vessel Debris Effects, Submittal Template for Final Response to Generic Letter 2004-02 and FSAR Changes," PWROG-16073-P, Revision 0, approved February 28, 2020.

Attachment: 1. List of Regulatory Commitments

cc: NRC Region 4 Regional Administrator
NRC Senior Resident Inspector – Waterford 3
NRC Project Manager Waterford 3

Attachment 1

W3F1-2020-0068

List of Regulatory Commitments

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

Commitment	Type (check one)		Scheduled Completion Date
	One-Time Action	Continuing Compliance	
Any necessary replacement or remediation of insulation will be based on the guidance of PWROG-16073-P and will be completed by the third refueling outage following its approval.	X		To be completed prior to completion of the third refueling outage following approval of PWROG-16073-P
After establishing a final determination of the scope of insulation replacement, remediation, or model refinements, Waterford 3 will submit a final updated supplemental response to support closure of GL 2004-02 for Waterford 3.	X		To be completed by December 31, 2021.
Waterford 3 will evaluate the current licensing basis following NRC acceptance of the final updated supplemental response for Waterford 3.	X		90 days following NRC acceptance of the supplemental response.