

W3F1-2022-0067

10 CFR 50.46

December 20, 2022

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001Subject: Commitment Change Notification for Generic Safety Issue – 191 and Generic  
Letter 2004-02Waterford Steam Electric Station, Unit 3  
NRC Docket No. 50-382  
Renewed Facility Operating License No. NPF-38

In Reference 1, the Nuclear Regulatory Commission (NRC) staff recommended three closure options to the Commission for resolving Generic Safety Issue - 191 (GSI-191), "Closure Options for Generic Safety Issue - 191, Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance," and the Commission approved the staff's recommendation to allow Licensees to choose any of the three options to close the issue (Reference 2). On May 16, 2013, Entergy Operations, Inc. (Entergy) submitted a letter to the NRC (Reference 3) identifying the closure option that Waterford 3 Steam Electric Station, Unit 3 (Waterford 3) had selected and the associated implementation schedule. In this letter, Entergy made several commitments to achieve closure of GSI-191 and to address Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors" (Reference 4).

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, Entergy 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." Note that the NRC informed the PWROG in 2019 that a Safety Evaluation (SE) would not be issued in WCAP-17788-P. On February 28, 2020, the PWROG approved the implementation guidance which supports the use of WCAP-17788-P by the PWROG members (Reference 7). Waterford 3 intends to follow the implementation guidance proposed by the PWROG. As documented in Reference 8, the commitments were revised to align with the

PWROG resolution strategy. Entergy is revising the completion date of the commitments as documented in the Attachment to provide additional time to fully develop and refine the PWROG resolution strategy for application at Waterford 3.

This commitment change does not affect the closure option Waterford 3 selected in Reference 3 and will still support successful closure of GL 2004-02.

This letter contains one revised commitment (Attachment).

Should you have any questions concerning this issue, please contact Leia Milster, Manager, Regulatory Assurance, at 504-739-6250.

Respectfully,



Leia Milster

LEM/jkb/mz

- References:
1. Nuclear Regulatory Commission (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. Entergy Operations, Inc (Entergy) letter to NRC, "Closure Option for Generic Safety Issue - 191," W3F1-2013-0027, (ADAMS Accession No. ML13137A133), dated May 16, 2013
  4. NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," (ADAMS Accession No. ML042360586), dated September 13, 2004
  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 (PWROG), "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
8. Entergy letter to NRC, "Commitment Change Notification for Generic Safety Issue – 191 and Generic Letter 2004-02," W3F1-2020-0068, (ADAMS Accession No. ML20329A519), dated November 24, 2020
9. Entergy letter to NRC, "Commitment Change Notification for Generic Safety Issue – 191 and Generic Letter 2004-02," W3F1-2021-0074, (ADAMS Accession No. ML21350A358) dated December 16, 2021

Attachment: List of Regulatory Commitments

cc: NRC Region IV Regional Administrator  
NRC Senior Resident Inspector, Waterford Steam Electric Station, Unit 3  
NRC Project Manager, Waterford Steam Electric Station, Unit 3

**Attachment**

**W3F1-2022-0067**

**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.

<b>Commitment</b>	<b>Type (check one)</b>		<b>Scheduled Completion Date</b>
	<b>One-Time Action</b>	<b>Continuing Compliance</b>	
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 March 30, 2023.