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Everett P. Perkins, Jr.
Director, Nuclear Safety Assurance
Waterford 3

W3F1-2000-0096
A4.05
PR

September 29, 2000

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Refuel 10 Full Core Offload

Gentlemen:

The purpose of this letter is to provide the NRC Staff with our evaluation of the Waterford 3 Licensing Basis as it relates to the full core off-load planned for Refuel 10. No action by the NRC Staff is necessary.

On March 28, 2000 Entergy provided the NRC Staff with a summary of our long-term plan to address RCS nozzle cracking at Waterford 3 (letter number W3F1-2000-0007). That plan includes permanent weld repairs of three RCS nozzles located below mid loop of the RCS hot legs during Refuel 10. These repairs require a full core off-load to be performed to allow draining the RCS down to the level necessary to allow welding. In preparation for this full core off-load, we have reviewed our Licensing Basis with respect to performance of full core off-loads.

Prior to issuance of Amendment 144 to Facility Operating License No. NPF-38, which increased the Spent Fuel Pool storage capacity, the Waterford 3 Final Safety Analysis Report (FSAR) did not discuss the performance or the frequency of full core off-loads. With the issuance of Amendment 144, the following statement was added to the FSAR - "Full core discharges are not routinely done during refueling outages". Refuel 10 is the first outage that requires a full core off-load since this statement was added to the FSAR. Waterford 3 does not consider the Refuel 10 full core off-load to be a routine occurrence.

The design of the Waterford 3 Spent Fuel Pool Cooling system is in accordance with NUREG-0800 Standard Review Plan section 9.1.3. It is designed to maintain pool

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temperatures less than 140°F assuming a partial core off-load and a single active failure (loss of one spent fuel pool cooling pump), and to maintain pool temperatures Refuel 10 Full Core Offload below boiling assuming a full core off-load and no active failures.

Although we do not consider the Refuel 10 full core off-load to be a routine evolution, our experience is suggesting that the need for this evolution may become more routine as we address age-related issues at our plant. Waterford 3 plans to perform analyses after Refuel 10 to support a License Amendment to revise our current Licensing Basis to include the routine performance of full core offloads.

All of the commitments contained in this submittal are identified on the attached Commitment Identification/Voluntary Enhancement Form. If you have any questions, please contact Lisa Borel, at (504) 739-6403.

Very truly yours,

A handwritten signature in black ink, appearing to read "E.P. Perkins, Jr.", with a stylized flourish at the end.

E.P. Perkins, Jr.
Director
Nuclear Safety Assurance

EPP/LBB/tmm
Attachment

cc: E.W. Merschoff, NRC Region IV
N. Kalyanam, NRC-NRR
J. Smith
N.S. Reynolds
NRC Resident Inspectors Office

COMMITMENT IDENTIFICATION/VOLUNTARY ENHANCEMENT FORM

Attachment 1 to W3F1-2000-0096
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COMMITMENT(S)	ONE-TIME ACTION*	CONTINUING COMPLIANCE*	SCHEDULED COMPLETION DATE (IF REQUIRED)	ASSOCIATED CR OR ER

*Check one only

VOLUNTARY ENHANCEMENT(S)	ASSOCIATED CR OR ER
Perform analyses to support a license amendment to revise our current licensing basis to include the routine performance of full core offloads	ER-W3-00-0053-00-01; ER-W3-00-0518-00-00