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F. G. Burford
Acting Director
Nuclear Safety & Licensing

CNRO-2006-00037

July 31, 2006

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

SUBJECT: Withdrawal of Request for Alternative W3-R&R-005

Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

REFERENCE: Entergy Operations, Inc. letter CNRO-2006-00009 to the NRC dated
February 24, 2006

Dear Sir or Madam:

In the referenced letter, Entergy Operations, Inc. (Entergy) submitted Relief for Alternative W3-R&R-005 for the Waterford Steam Electric Station, Unit 3 (Waterford 3). This request proposed to use K_{Ic} vs. K_{Ia} and elastic-plastic fracture mechanics (EPFM) with associated acceptance criteria. This request had been submitted in support of analyses to qualify the Waterford 3 pressurizer with respect to recently-identified insurge/outsurge transient loading conditions.

While there has been industry precedence for such a request, Entergy has reviewed the ASME Code requirements and has concluded that NRC approval of the request is not required. This conclusion is based on the following points:

1. The rules of IWB-3000 are only applicable to flaws discovered by the examinations required by IWB-2500, and
2. Deviations to non-mandatory ASME Code appendices do not require NRC approval.

Therefore, by this letter, Entergy withdraws W3-R&R-005.

Representatives from the NRC staff and Entergy have discussed this request and the logic for withdrawal in several telephone calls. As discussed in these calls, Entergy will provide the results of the flaw evaluation to the staff following the guidance of ASME Section XI IWB-3134. Entergy expects to submit the evaluation on or before August 31, 2006. This commitment is reflected in the attachment to this letter. In addition, Entergy withdraws the commitments made in the referenced letter.

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Should you have any questions regarding this letter, please contact Guy Davant at (601) 368-5756.

Very truly yours,



FGB/GHD/ghd

Attachment: Licensee-Identified Commitments

cc: Mr. W. A. Eaton (ECH)
Mr. J. E. Venable (W3)

Dr. Bruce. S. Mallett
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

NRC Senior Resident Inspector
Waterford Steam Electric Station, Unit 3
P. O. Box 822
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U. S. Nuclear Regulatory Commission
Attn: Mr. M. B. Fields
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LICENSEE-IDENTIFIED COMMITMENTS

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Entergy will provide the results of the flaw evaluation to the staff.	✓		8/31/06

Entergy withdraws the commitments made in Entergy letter CNRO-2006-00009 dated February 24, 2006.