



Entergy Operations, Inc.  
17265 River Road  
Killona, LA 70057-3093  
Tel 504-739-6715  
Fax 504-739-6698  
jkowale@entergy.com

Joseph A. Kowalewski  
Vice President, Operations  
Waterford 3

W3F1-2011-0012

February 9, 2011

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

SUBJECT: Commitment Change for Resolution of Generic Letter 2004-02 due to Deferral  
of Replacing the Waterford 3 Steam Generators  
Waterford Steam Electric Station, Unit 3  
Docket No. 50-382  
License No. NPF-38

- REFERENCES:
1. W3F1-2010-0032, Response to Request for Additional Information Regarding Final Supplemental Response to Generic Letter 2004-02, Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors (TAC No. MC4729), dated 11/23/10 (ADAMS Accession No. ML103340117)
  2. Staff Requirements Memorandum – SECY-10-0113 – Closure Options for Generic Safety Issue -191, Assessment of Debris Accumulation on Pressurized Water Reactor Sump Performance, dated December 23, 2010 (ADAMS Accession No. ML103570354)

Dear Sir or Madam:

The purpose of this letter is to notify the NRC of a change to the completion date for a commitment made associated with Generic Letter 2004-02. In Reference 1, it was indicated that Waterford 3 will replace the fibrous insulation on the current steam generators with Reflective Metal Insulation prior to Mode 4 following Refueling Outage 17. It was clarified within the contents of Reference 1 that Waterford 3 intended to install the Reflective Metal Insulation (RMI) in conjunction with replacing the steam generators during Refueling Outage 17 (RFO17). Activities were in progress to meet this commitment when a manufacturing problem with the replacement steam generators was identified. The manufacturing problem cannot be immediately resolved and the replacement steam generators will not be available for installation during RFO17. The RMI that had been designed for the replacement steam

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generators will not fit the current steam generators without significant modification, and no other RMI has been designed or planned. Therefore, RMI will not be installed on the current steam generators in Refueling Outage 17.

Nonetheless, in Reference 2, the NRC indicated that resolution of GSI-191 is dependent upon completion of tests and analyses regarding in-vessel effects, which would be needed to allow formulating a path forward by mid-year 2012. As such, the NRC stated that it would be prudent to defer further GSI-191 plant modification actions (such as fibrous material removal) until the tests and analyses are complete.

Waterford 3 is revising its commitment to complete the removal of the fibrous insulation and replace it with Reflective Metal Insulation from RFO17 to "prior to Mode 4 following Refueling Outage 18." This revision is only a change in the due date for replacing the fibrous insulation and not a change in the commitment to replace it.

Extending the commitment due date has been determined to be acceptable based on the original commitment's intent to replace the fibrous insulation in conjunction with replacing the steam generators and that it is consistent with the NRC guidance in Reference 2 (specifically that it is prudent to defer fibrous material removal at this time).

This letter contains one commitment that revises commitment number 1 contained in Reference 1.

If you have any questions or require additional information, please contact William J. Steelman at 504-739-6685.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 9, 2011.

Sincerely,



JAK/MEM/

Attachments: List of Regulatory Commitments

cc: Mr. Elmo E. Collins, Jr.  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
612 E. Lamar Blvd., Suite 400  
Arlington, TX 76011-4125

NRC Senior Resident Inspector  
Waterford Steam Electric Station Unit 3  
P.O. Box 822  
Killona, LA 70066-0751

U. S. Nuclear Regulatory Commission  
Attn: Mr. N. Kalyanam  
Mail Stop O-07D1  
Washington, DC 20555-0001

**Attachment to**

**W3F1-2011-0012**

**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</b> (Check One)		<b>SCHEDULED COMPLETION DATE</b> (If Required)
	<b>ONE- TIME ACTION</b>	<b>CONTINUING COMPLIANCE</b>	
Waterford 3 will replace the fibrous insulation on the current steam generators with Reflective Metal Insulation.	x		Prior to Mode 4 following Refueling Outage 18