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Joseph A. Kowalewski
Vice President, Operations
Waterford 3

W3F1-2011-0061

July 26, 2011

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

SUBJECT: Commitment to Provide 10 CFR 50.48(c) License Amendment Request and Request for Continued Enforcement Discretion
Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

REFERENCES: 1. NRC Policy Statement, Interim Enforcement Policy for Certain Fire Protection Issues, Federal Register Vol. 76, No. 133, Tuesday July 12, 2011, pages 40777 through 40779.
2. Summary of May 18, 2011, "Meeting with the Nuclear Energy Institute, Industry Representatives, and Licensees on Transitioning to National Fire Protection Association Standard 805", May 31, 2011.

Dear Sir or Madam:

In accordance with the NRC Interim Enforcement Policy for Certain Fire Protection Issues (Reference 1), Entergy Operations, Inc. (Entergy) commits to submit the license amendment request (LAR) implementing 10 CFR 50.48(c) for Waterford Steam Electric Station, Unit 3 (Waterford 3) by November 30, 2011. This LAR will seek NRC approval to apply the methodology under National Fire Protection Association (NFPA) 805, "Performance Based Standard for Fire Protection for Light Water Reactor Electric Generation Plants".

During a meeting conducted between members of Nuclear Energy Institute (NEI), industry representatives, and the NRC on May 18, 2011 (Reference 2), it was noted that Waterford 3 proposed to submit the LAR by the end of September 2011. It was also discussed in Reference 2, that these dates did not represent licensee commitments. Actual submittal dates would be based on licensee letters formally submitted to the NRC following additional assessment by the licensees.

The Waterford 3 Fire Protection Probabilistic Risk Assessment (PRA) is applying alternate PRA methods to those provided in NUREG/CR-6850 which are currently undergoing review by an EPRI Peer Review Group. Consistent with the NRC desire for these alternate methods to be resolved prior to submittal, Entergy is working toward timely resolution of

these changes in methods with the EPRI Peer Review Group. The proposed submittal by November 30, 2011 is based upon Entergy's evaluation of the resources necessary to ensure the quality and completeness of the license amendment request and to allow for generic approval or plant specific application of these alternative methods.

Entergy believes that the proposed submittal date for the Waterford 3 NFPA 805 LAR is responsive to the revised Policy Statement. Entergy requests that the enforcement discretion be extended to the LAR submittal commitment date.

This letter contains one new commitment.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'J. A. K. W. J. S.', with a stylized flourish at the end.

JAK/WJS

Attachment: 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	RidsRgn4MailCenter@nrc.gov
	NRC Senior Resident Inspector Waterford Steam Electric Station Unit 3 P.O. Box 822 Killona, LA 70066-0751	marlone.davis@nrc.gov Dean.Overland@nrc.gov
	U. S. Nuclear Regulatory Commission Attn: Mr. N. Kalyanam Mail Stop O-07D1 Washington, DC 20555-0001	Kaly.Kalyanam@nrc.gov

Attachment to
W3F1-2011-0061
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 (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
Entergy Operations, Inc. (Entergy) commits to submit the License Amendment Request (LAR) implementing 10 CFR 50.48(c) for Waterford Steam Electric Station, Unit 3 (Waterford 3)	X		November 30, 2011