

VERBAL AUTHORIZATION OF RELIEF REQUEST WF3-2012-1

By letter dated August 3, 2012, Entergy Nuclear Operations Inc., submitted relief request, VRR-WF3-2012-1, to the NRC. The Relief Request is applicable to the third 10-year inservice testing (IST) program interval at Waterford Steam Electric Station, Unit 3. You requested one-time relief to extend the valve seat leakage test frequency of an Auxiliary Component Cooling Water check valve, ACC-108B, for approximately two months, as required by the ASME *Code for Operation and Maintenance of Nuclear Power Plants*. The request was, pursuant to 10 CFR 50.55a(f)(5)(iii), relief from certain IST requirements because compliance is impractical.

The ASME OM Code requires that Category A valves shall be tested to verify that seat leakage is within acceptable limits. The leakage test shall be conducted at least once every two years. Due to a leaking manual isolation butterfly valve, AAC-101B, you are unable to leak test ACC pump B discharge line check valve, ACC-108B, per the normal testing configuration. You considered other possible configurations for testing ACC-108B and concluded that the alternatives either could not be performed or would result in exceeding the TS, 72-hour LCO limit for the ACCW system being inoperable, thus requiring a plant shutdown. Due to the inability to obtain proper test conditions in Mode 1 of operation, completion of the ASME requirements for leak testing ACC-108B are impractical.

Evaluation of the previous 10 year leak-test history for check valve, ACC-108B, shows that the leakage rate has been well within acceptable limits. Also, ACC-108B was rebuilt in 2010 and had a successful post-maintenance test (PMT). Review of the leak-test history and the PM task and successful PMT from 2010, supports a minor extension (i.e. a couple of months) of the leak test interval and provides reasonable assurance of the operational readiness of the ACCW check valve, ACC-108B.

Therefore, the NRC staff determined that it is impractical for Waterford 3 to comply with certain requirements of the ASME OM Code for the ACCW check valve, ACC-108B. Based on the excellent historical leak test performance and recent completion of the valve PM task and subsequent successful PMT, extending the proposed leakage test interval for ACC-108B, by approximately two months, from August 21, 2012 to the RF18 Refueling Outage (October 2012) still provides reasonable assurance that ACC-108B will remain operationally ready.

Granting relief pursuant to 10 CFR 50.55a(f)(6)(i) is authorized by law and will not endanger life or property or the common defense and security, and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. All other ASME OM Code requirements for which relief was not specifically requested and approved in the subject request remain applicable.

Therefore, the NRC staff grants relief of the leakage-rate testing, frequency requirement, detailed in this relief request, until the next refueling outage, RF18, currently scheduled to start on October 17, 2012. The IST test for check valve, ACC-108B, shall be completed prior to plant start-up.

The attendees at today's phone call at Waterford 3 were:

Mike Mason, Acting Licensing Manager
Chris Pickering, Acting Engineering Programs and Components Supervisor
Robert O'Quinn, IST Program Coordinator
Jim Pollock, Licensing Specialist

Marlone Davis, Waterford 3 NRC Senior Resident

The attendees from HQ were:

Mike Markley Chief, DORL/LPL4

Tony McMurtray Chief, DSS/EPTB (Component Performance and Testing Branch)

Kaly N. Kalyanam, PM, Waterford 3