

September 5, 2014

MEMORANDUM TO: Douglas A. Broaddus, Chief  
Plant Licensing IV-2 and Decommissioning  
Transition Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: Alan B. Wang, Project Manager/*RA/ Thomas J. Wengert for*  
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SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - REVIEW OF  
FINAL SAFETY ANALYSIS REPORT UPDATE, REVISION 307 (TAC  
NO. MF2726)

This memorandum documents the in-office U.S. Nuclear Regulatory Commission (NRC) staff review of Revision 307 to the Final Safety Analysis Report (FSAR) update for Waterford Steam Electric Station, Unit 3 (WF3), dated July 11, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13218A409). Revision 307 covered changes to the FSAR during the period April 13, 2012, through June 17, 2013. The update was submitted by Entergy Operations, Inc. (Entergy, the licensee), in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.71(e). Entergy follows the guidance of Nuclear Energy Institute (NEI) 98-03, Revision 1, "Guidelines for Updating Final Safety Analysis Reports."

### **Amendments**

The license amendments issued for the appropriate period (April 13, 2012, through June 17, 2013) were reviewed by the NRC staff for impacts on the FSAR and included amendment numbers 235 through 240. After review, the six license amendments changed WF3's Technical Specifications, but made no modifications to FSAR Revision 307.

### **Inspection Reports**

The 15 inspection reports (IRs) for the appropriate period were reviewed by the NRC staff for impacts on the FSAR. No IRs included corrective actions or enforcement that would require modifications to the FSAR.

**Licensee Event Reports**

The six licensee event reports (LERs) for the appropriate period were reviewed by the NRC staff for impacts on the FSAR. No LERs included corrective actions that would require modifications to the FSAR.

**10 CFR 50.59 Evaluations**

The 10 CFR 50.59 evaluations for the appropriate period were submitted via letter dated April 29, 2014 (ADAMS Accession No. ML14129A350). Eleven of the 10 CFR 50.59 evaluations submitted in the report were applicable to Revision 307 and only nine of the 10 CFR 50.59 evaluations resulted in changes to the FSAR. Of the two reports that did not result in an FSAR change, one was for an emergency plan modification and the other was for a temporary modification. For each of the nine evaluations that did result in FSAR changes, the NRC staff determined that the licensee appropriately incorporated the changes into Revision 307. The staff has one comment on the licensee's 10 CFR 50.59 evaluations. In several of the 10 CFR 50.59 evaluations, the FSAR section to be changed due to the evaluation is not clearly stated, making it difficult to review the evaluations' incorporation into the FSAR. The licensee could improve its documentation by explicitly identifying the FSAR sections to be modified within the 10 CFR 50.59 evaluation.

An additional NRC staff comment is that the licensee thoroughly references the revision's changes within the FSAR. The licensee identifies each changed paragraph with arrows and lists the change document that modified the paragraph. Additionally, the revision number when the change was incorporated is often listed. This thorough referencing within the FSAR supports plant safety because the change basis can be easily found, reducing the chance of future engineering errors.

The NRC staff's sampling review of the FSAR Revision 307 included the applicable amendments, IRs, LERs, and 10 CFR 50.59 evaluations. The staff did not find any commitments to modify the FSAR in its review of the IRs or LERs. Based on the review, the staff concludes that the FSAR Revision 307 was submitted consistent with the requirements in 10 CFR 50.71(e).

### Licensee Event Reports

The six licensee event reports (LERs) for the appropriate period were reviewed by the NRC staff for impacts on the FSAR. No LERs included corrective actions that would require modifications to the FSAR.

### 10 CFR 50.59 Evaluations

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Docket No. 50-382

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