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Waterford 3

W3F1-2015-0078

September 24, 2015

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

SUBJECT: Revised Implementation Item Regarding Adoption of National Fire Protection Association Standard NFPA 805 License Amendment Request (LAR) Waterford Steam Electric Station, Unit 3 (Waterford 3)  
Docket No. 50-382  
License No. NPF-38

- REFERENCES:
1. Entergy letter W3F1-2011-0074 "License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactor Generating Plants (2001 Edition)", Waterford Steam Electric Station, Unit 3 dated November 17, 2011 [ML113220230]
  2. Entergy letter W3F1-2012-0005 "Supplemental Information in Support of the NRC Acceptance Review of Waterford 3 License Amendment Request to Adopt NFPA 805, Waterford Steam Electric Station, Unit 3" dated January 26, 2012 [ML12027A049]
  3. Entergy letter W3F1-2013-0048 "Supplement to NFPA 805 License Amendment Request (LAR) Waterford Steam Electric Station, Unit 3" dated December 18, 2013 [ML13365A325]
  4. NRC letter to Entergy dated July 13, 2015 "Request for Additional Information RE: License Amendment Request to Transition to National Fire Protection Association Standard 805 "(TAC NO. ME7602) [ML15182A346]
  5. NRC letter to Entergy dated July 21, 2015, "Request for Additional Information RE: License Amendment Request to Transition to National Fire Protection Association Standard 805" (TAC NO. ME7602) [ML15197A229]
  6. Entergy letter W3F1-2015-0057, "Responses to Request for Additional Information Regarding Adoption of National Fire Protection Association Standard NFPA 805 License Amendment Request (LAR) Waterford Steam Electric Station, Unit 3" dated August 31, 2015.

Dear Sir or Madam:

By letter dated November 17, 2011, as supplemented by letters dated January 26, 2012, and December 18, 2013 (References 1 through 3 respectively), Entergy Operations, Inc. (Entergy), submitted a license amendment request (LAR) to transition its fire protection license basis at the Waterford Steam Electric Station, Unit 3, from paragraph 50.48(b) of Title 10 of the *Code of Federal Regulations* (10 CFR) to 10 CFR 50.48(c), "National Fire Protection Association Standard 805" (NFPA 805).

The LAR Supplement provided in Reference 3 represents changes to specified LAR Attachments and supporting calculations primarily as a result of performing extensive reanalysis utilizing only NRC-accepted methods. Two Requests for Additional Information letters were received on July 13, 2015 (Fire Modeling RAIs) and July 21, 2015 (Probabilistic Risk Analysis RAIs) via References 4 and 5. The responses to these RAIs were provided in Reference 6.

During a clarification call between the NRC and Entergy on September 21, 2015, the NRC requested that implementation item S2-22 be revised to include relevant information contained in Reference 6. The attachment contains the revised implementation item S2-22.

There are no new regulatory commitments contained in this submittal. If you require additional information, please contact the Regulatory Assurance Manager, John Jarrell at 504-739-6685.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 24, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read "MRC/AJH", with a stylized, cursive-like script.

MRC/AJH

Attachment: Revised Implementation Item S2-22

cc: Marc L. Dapas Regional Administrator U. S. Nuclear Regulatory Commission Region IV 1600 E. Lamar Blvd. Arlington, TX 76011-4511	RidsRgn4MailCenter@nrc.gov
NRC Senior Resident Inspector Waterford Steam Electric Station Unit 3 P.O. Box 822 Killona, LA 70066-0751	Frances.Ramirez@nrc.gov
U. S. Nuclear Regulatory Commission Attn: Mr. Michael Orenak Mail Stop 8-G9A Washington, DC 20555-0001	Michael.Orenak@nrc.gov
Louisiana Department of Environmental Quality Office of Environmental Compliance Surveillance Division P.O. Box 4312 Baton Rouge, LA 70821-4312	Ji.Wiley@LA.gov

**ATTACHMENT**

**W3F1-2015-0078**

**Revised Implementation Item S2-22**

### **Revised Implementation Item S2-22**

Verify the validity of the reported change-in-risk subsequent to completion of all PRA-credited modifications, procedures updates, and implementation items matches the as-built, as-operated plant. This reported change-in-risk will include the following considerations:

1. Methods and guidance contained in NUREG/CR-7150 Volume 2 in addressing circuit failure probability (W3F1-2015-0015 PRA RAI S15 & W3F1-2015-0024 PRA RAI S17).
2. Assessment of SOKC contributions in order to represent the mean value CDF and LERF as described in Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant - Specific Changes to the Licensing Basis, Revision 2, dated May 2011 (W3F1-2015-0057 PRA RAI S18.b.01)
3. Updated fire-modeling for secondary ignition impacts with Hot Gas Layer (HGL) development and Multi-Compartment Analysis (MCA) as described in response to FM RAI S01.b.01 (W3F1-2015-0057)
4. Updated fire-modeling for impacts due to re-assessment of the elevation of transient combustibles as presented in response to FM RAI S01.f.01 (W3F1-2015-0057)