



Entergy Operations, Inc.
17265 River Road
Killona, LA 70057-3093
Tel 504 739 6685
Fax 504 739 6698
jjarrel@entergy.com

John P. Jarrell III
Manager, Regulatory Assurance
Waterford 3

10 CFR 50.55a

W3F1-2018-0044

September 12, 2018

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

SUBJECT: Clarification to Waterford 3 Request for Alternative W3-ISI-023
Waterford Steam Electric Station, Unit 3 (Waterford 3)
License No. NPF-38
Docket No. 50-382

- REFERENCES:**
1. W3F1-2013-0044, Waterford 3 Request for Alternative W3-ISI-023, ASME Code Case N-770-1 Successive Examinations, September 26, 2013 [NRC ADAMS Accession Number ML13270A041].
 2. Waterford Steam Electric Station, Unit 3 – Request for Alternative W3-ISI-023, ASME Code Case N-770-1 Successive Examinations, Third 10-Year Inservice Inspection Interval (TAC No. MF2815), February 26, 2014 [NRC ADAMS Accession Number ML14070A008].
 3. W3F1-2012-0102, Waterford 3 Supplemental Response to an NRC Request for Additional Information (RAI) Associated with W3-ISI-020, Request For Alternative to ASME Code Case N-770-1 Baseline Examination (TAC No. ME9801), December 16, 2012 [NRC ADAMS Accession Number ML12352A172].
 4. 2CAN121201, Revised Request For Alternative ANO2-ISI-007 Code Case N-770-1 Baseline Examination Arkansas Nuclear One, Unit 2, December 4, 2012 [NRC ADAMS Accession Number ML12340A449].

Dear Sir or Madam:

By letter dated September 26, 2013 (Reference 1), Entergy Operations, Inc. (EOI), submitted a request to the U.S. Nuclear Regulatory Commission (NRC) for an alternative to the inspection coverage requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, for seven full-penetration welds at the Waterford Steam Electric Station, Unit 3 (Waterford 3). This requested relief pursuant to 50.55a(a)(3)(ii) from the requirements of ASME Code Case N-770-1, as conditioned by 10 CFR 50.55a(g)(6)(ii)(F), pertaining to volumetric examination of the dissimilar metal welds associated with the suction and discharge piping of the Reactor Coolant Pumps (RCP) and the Safety Injection (SI) nozzle to safe-ends at Waterford 3.

By letter dated March 26, 2014 (Reference 2), the NRC approved the use of alternative W3-ISI-023 for 54 months following the Spring 2014 refueling outage examinations, with examinations to be performed during the Fall 2018 refueling outage. The outage schedule has since been revised and will now commence in early 2019. The Spring 2014 outage ended May 14, 2014; therefore, the 54 month alternative ends November 9, 2018.

By this letter, Entergy requests clarification to the duration of the approved alternative to be 54 operating months following the Spring 2014 refueling outage. The basis for the alternative states that flaw growth in the subject welds would not exceed the ASME Code allowable flaw size during 54 months at operating temperatures of 525 °F or higher. Given the operating history since the Spring 2014 outage, 54 months at operating temperature would end January 31, 2019. The start date of the Spring 2019 refueling outage is before January 31, 2019, therefore, the alternative to inspection requirements will not exceed 54 operating months. The examinations will be performed prior to completion of the Spring 2019 refueling outage. Entergy previously provided the technical basis supporting the alternative inspection period in References 3 and 4.

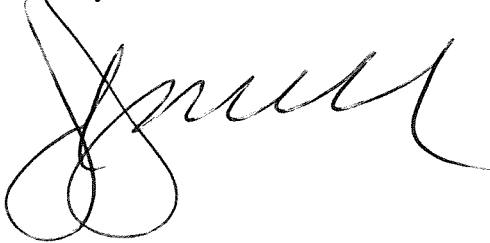
Relief was originally requested per 10 CFR 50.55a(a)(3)(ii). Since approval of the request, 10 CFR 50.55a has been revised and the corresponding regulation is 10 CFR 50.55a(z)(2). In addition, the subject code case N-770-1 has been replaced by N-770-2. Code case N-770-2 has been incorporated into the Waterford 3 Inservice Inspection program.

This document contains a revision to a regulatory commitment that was made in Reference 1. This revision is provided in the Attachment.

Entergy requests approval by November 8, 2018.

Should you have questions regarding this report, please contact John P. Jarrell, Regulatory Assurance Manager, at (504) 739-6685.

Sincerely,

A handwritten signature in black ink, appearing to read 'JPJ', with a large, stylized loop at the end.

JPJ/RRD

Attachment: Waterford 3 Steam Electric Station Regulatory Commitment

cc: Mr. Kriss Kennedy, Regional Administrator
U.S. NRC, Region IV
RidsRgn4MailCenter@nrc.gov

U.S. NRC Project Manager for Waterford 3
April.Pulvirenti@nrc.gov

U.S. NRC Senior Resident Inspector for Waterford 3
Frances.Ramirez@nrc.gov
Chris.Speer@nrc.gov

Attachment
to
W3F1-2018-0044
Waterford 3 Steam Electric Station
Regulatory Commitment
(1 page)

**Waterford 3 Steam Electric Station
Regulatory Commitment**

This table identifies actions discussed in this letter for which Entergy commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are not commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
Perform N-770-2 examination of the 30" and 12" RCS nozzles within 54 operating months with cold leg temperatures at or above 525 °F following the Spring 2014 refueling outage.	X		Prior to conclusion of the Spring 2019 Waterford 3 Refueling Outage.