



Entergy Operations, Inc.  
P.O. Box B  
Kilbuck, LA 70066  
Tel 504 739 6242

James J. Fisicaro  
Director  
Nuclear Safety  
Waterford 3

W3F1-96-0164  
A4.05  
PR

October 28, 1996

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Subject: Waterford 3 SES  
Docket No. 50-382  
License No. NPF-38  
NRC Inspection Report 95-23  
Commitment Change

Gentlemen:

Waterford 3 submitted the response to Notice of Violation EA 96-025/01013 per letter W3F1-96-0052, dated April 29, 1996. In this letter it was stated that design change DC-3470 had been initiated to preclude excessive dynamic loads from air intrusion or column separation in the Auxiliary Component Cooling Water (ACCW) system, and that this design change would be ready to install by September 30, 1996. This commitment, and proposed "ready-to-install" date, were originally discussed with the NRC during a March 5, 1996 enforcement conference associated with the subject inspection report. The September 30 date was aggressively chosen at that time to possibly preclude running the ACCW pumps continuously through the winter months as was done in 1995. Since the proposed design change cannot be implemented at power, implementation of the design change was proposed for Refueling Outage 8 or a forced outage of sufficient duration. Waterford 3 has pursued DC-3470 aggressively, ensuring that the design accounts for the various possible mechanisms of air intrusion and column separation, while ensuring that the safety function of the ACCW system is maintained. The original design plan of installing a power-operated discharge valve for each ACCW pump alone was subsequently determined to not fully address the potential for air intrusion and/or column separation. A combination of the power-operated valves and a keep-full system was determined to be the optimum solution. Due to the evolution of the design solution, the complexity of the proposed modification, and the time required for the ordering and delivery of components, Waterford 3 was unable to meet the original "ready-to-install" date of

9610300034 961028  
PDR ADOCK 05000382  
G PDR

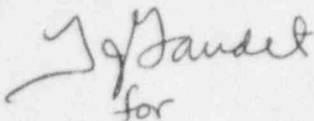
1/0  
Leq1

NRC Inspection Report 95-23  
Commitment Change  
W3F1-96-0164  
Page 2  
October 28, 1996

September 30. The interim action of running the ACCW pumps continuously will remain until the design change is implemented. The scheduled implementation date for DC-3470 remains as Refueling Outage 8 (scheduled for April, 1997) or a prior forced shutdown of sufficient duration. This commitment change was discussed with the Waterford 3 NRC Region IV Branch Chief during a conference call on September 12, 1996.

If you have any questions concerning this response, please contact me at (504) 739-6242 or Tim Gaudet at (504) 739-6666.

Very truly yours,

Handwritten signature of J.J. Fisicaro, with the word "for" written below it.

J.J. Fisicaro  
Director  
Nuclear Safety

JJF/DFL/tjs  
Attachment

cc: L.J. Callan (NRC Region IV), C.P. Patel (NRC-NRR),  
R.B. McGehee, N.S. Reynolds, NRC Resident Inspectors Office