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10 CFR 50.46

W3F1-2021-0074

December 16, 2021

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

Subject: Commitment Change Notification for Generic Safety Issue - 191 and
Generic Letter 2004-02

Waterford Steam Electric Station, Unit 3
NRC Docket No. 50-382
Renewed Facility Operating License No. NPF-38

In Reference 1, the Nuclear Regulatory Commission (NRC) staff recommended three closure options to the Commission for resolving Generic Safety Issue - 191 (GSI-191), "Closure Options for Generic Safety Issue - 191, Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance," and the Commission approved the staff's recommendation to allow Licensees to choose any of the three options to close the issue (Reference 2). On May 16, 2013, Entergy Operations, Inc. (Entergy) submitted a letter to the NRC (Reference 3) identifying the closure option that Waterford 3 Steam Electric Station, Unit 3 (Waterford 3) had selected and the associated implementation schedule. In this letter, Entergy made several commitments to achieve closure of GSI-191 and to address Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors" (Reference 4).

Subsequently, the Pressurized Water Reactor Owners Group (PWROG) program schedule changed. This resulted in Waterford 3 not being able to meet the original commitment date of June 30, 2015. Based upon the change in the schedule, Entergy revised one of the commitments as documented in Reference 5. Additional revisions were made to the commitments due to the PWROG schedule revisions as documented in Reference 6.

Waterford 3 intends to follow the resolution strategy proposed by the PWROG for establishing in-vessel fiber limits. The PWROG resolution strategy includes testing and analysis as summarized in WCAP-17788-P, "Comprehensive Analysis and Test Program for GSI-191 Closure (PA-SEE-1090) – Cold Leg Break (CLB) Evaluation Method for GSI-191 Long-Term Cooling." Note that the NRC informed the PWROG in 2019 that a Safety Evaluation (SE) would not be issued on WCAP-17788-P. On February 28, 2020, the PWROG approved the Technical

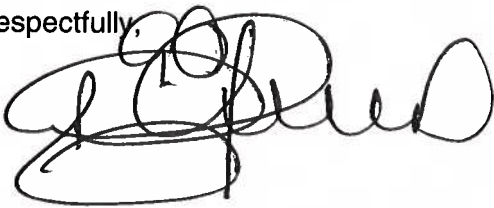
Specification Task Force (TSTF)-567 implementation guidance which supports the use of WCAP-17788-P by the PWROG members (Reference 7). Waterford 3 intends to follow the TSTF-567 implementation guidance proposed by the PWROG. As documented in Reference 8, the commitments were revised to align with the PWROG resolution strategy and the TSTF-567 implementation guidance. Entergy is revising the completion date of one of the commitments as documented in Attachment 1 to provide the additional time needed to fully develop and refine the PWROG resolution strategy for application at Waterford 3.

This commitment change does not affect the closure option Waterford 3 selected in Reference 3 and will still support successful closure of GL 2004-02.

This letter contains one revised commitment (Attachment 1).

If you have any questions or require additional information, please contact John Lewis, Regulatory Assurance Manager, at 504-739-6028.

Respectfully,

A handwritten signature in black ink, appearing to be 'John Lewis', written over a horizontal line.

John Lewis

JL/mmz/cdm

- References:
1. Nuclear Regulatory Commission (NRC) Policy Issue, "Closure Options for Generic Safety Issue - 191, Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance," SECY-12-0093, (ADAMS Accession No. ML121320270), dated July 9, 2012
 2. NRC Staff Memorandum, "Staff Requirements - SECY-12-0093 - Closure Options for Generic Safety Issue - 191, Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance," SRM-NRC SECY-12-0093, (ADAMS Accession No. ML12349A378), dated December 14, 2012
 3. Entergy Operations, Inc (Entergy) letter to NRC, "Closure Option for Generic Safety Issue - 191," W3F1-2013-0027, (ADAMS Accession No. ML13137A133), dated May 16, 2013
 4. NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," (ADAMS Accession No. ML042360586), dated September 13, 2004
 5. Entergy letter to NRC, "Commitment Change Notification for Generic Safety Issue - 191," W3F1-2015-0050, (ADAMS Accession No. ML15181A393), dated June 30, 2015

6. Entergy letter to NRC, "Commitment Change Notification for Generic Safety Issue - 191," W3F1-2016-0089, (ADAMS Accession No. ML16350A459), dated December 15, 2016
7. Pressurized Water Reactor Owners Group (PWROG), "TSTF-567 Implementation Guidance, Evaluation of In-Vessel Debris Effects, Submittal Template for Final Response to Generic Letter 2004-02 and FSAR Changes," PWROG-16073-P, Revision 0, approved February 28, 2020
8. Entergy letter to NRC, "Commitment Change Notification for Generic Safety Issue – 191 and Generic Letter 2004-02," W3F1-2020-0068, (ADAMS Accession No. ML20329A519), dated November 24, 2020

Attachment: List of Regulatory Commitments

cc: NRC Region IV Regional Administrator
NRC Senior Resident Inspector, Waterford Steam Electric Station, Unit 3
NRC Project Manager, Waterford Steam Electric Station, Unit 3

Attachment

W3F1-2021-0074

List of Regulatory Commitments

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

Commitment	Type (check one)		Scheduled Completion Date
	One-Time Action	Continuing Compliance	
After establishing a final determination of the scope of insulation replacement, remediation, or model refinements, Waterford 3 will submit a final updated supplemental response to support closure of GL 2004-02 for Waterford 3.	X		To be completed by December 31, 2022.