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William J. Steelman
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Waterford 3

W3F1-2012-0011

February 27, 2012

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

SUBJECT: Commitment Date Change for Submittal of Reactor Vessel Internals
Degradation Management Program Consistent with MRP-227-A
Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

REFERENCES:

1. Entergy Letter dated February 5, 2005, "Supplement to Amendment Request NPF-38-249 Extended Power Uprate" [Adams Accession No. ML050400463]
2. Entergy Letter dated April 7, 2010, "Commitment Change Associated with Reactor Vessel Internals Degradation Management Program" [Adams Accession No. ML100990355]
3. NRC letter dated June 12, 2009, "Waterford Steam Electric Station, Unit 3 – Request for Alternative W3-ISI-006 for the Second 10-Year Inservice Inspection Interval (TAC No. MD9671)" [Adams Accession No. ML091210375]
4. TR MRP-227 SER [Adams Accession No. ML111600498]
5. NRC Regulatory Issue Summary 2011-07 License Renewal Submittal Information for Pressurized Water Reactor Internals Aging Management (Dated July 21, 2011) [Adams Accession No. ML111990086]
6. NRC letter dated December 16, 2011, "Revision 1 to the Final Safety Evaluation of Electric Power Research Institute (EPRI) Report, Materials Reliability Program (MRP) Report 1016596 (MRP-227), Revision 0, "Pressurized Water Reactor (PWR) Internals Inspection and Evaluation Guidelines" (TAC NO. ME0680)" [Adams Accession No. ML11308A770]
7. Entergy Letter dated December 19, 2011, "Commitment Change for Reactor Vessel Internals Degradation Management Program" [Adams Accession No. ML11356A083]

Dear Sir or Madam:

Entergy Letter dated February 5, 2005 (Reference 1), Entergy Operations, Inc. (Entergy) made the following commitment:

Entergy Operations, Inc (Entergy) is currently an active participant in the Electric Power Research Institute (EPRI) Materials Reliability Program (MRP) research initiatives on aging related degradation of reactor vessel internal components. Entergy commits to:

- a. continue its active participation in the MRP initiative to determine appropriate reactor vessel internals degradation management programs,
- b. evaluate the recommendations resulting from this initiative and implement a reactor vessel internals degradation management program applicable to Waterford 3,
- c. incorporate the resulting reactor vessel internals inspections into the Waterford 3 augmented inspection plan as appropriate.

In addition, as requested by the NRC, a description of the program, including the inspection plan, will be submitted to the NRC for review and approval. The submittal date will be within 24 months after the final EPRI MRP recommendations are issued or within five years from the date of issuance of the uprated license, whichever comes first.

Entergy Letter dated April 7, 2010 (reference 2) notified the NRC of a change to the commitment of record made in reference 1. The fundamental change affected the schedule for submitting a description of a reactor vessel internals degradation management program to the NRC for review and approval. The revised commitment required submittal of the plan by December 31, 2011.

Entergy Letter dated December 19, 2011 (reference 7) notified the NRC of a change to the commitment of record made in reference 2. The fundamental change affected the schedule for submitting a description of a reactor vessel internals degradation management program, also referred to as an Aging Management Program (AMP), to the NRC for review and approval. The commitment in reference 7 would have required submittal of the plan 24 months prior to entering the period of extended operation associated with its License Renewal Application as provided for in NRC Regulatory Issue Summary 2011-07 License Renewal Submittal Information for Pressurized Water Reactor Internals Aging Management (reference 5). With the issuance of the staff SE for MRP-227 (reference 6), the NRC updated internal guidance on implementation of this Reactor Vessel component Aging Management Program guidance relative to license renewal for PWR plants on a plant-specific basis. Plant-specific basis categories A through D were defined. Waterford 3 had believed it fell into Category D in that it has not submitted an LRA but plans to submit an LRA in the future.

It was communicated to Waterford 3 on a February 9, 2012 discussion with NRC personnel regarding the Entergy Letter dated December 19, 2011 that Category D did not include plants that had received an Extended Power Uprate and Waterford 3 did not

fall into Category D because it had received an Extended Power Uprate. During the discussion, it was agreed that a commitment date meeting the EPRI/MRP Initiative Needed requirement date was acceptable.

This letter is to notify the NRC of a change to the commitment made in reference 7. The revised commitment will require submittal of a description of the program, including the inspection plan, to the NRC for review and approval no later than December 16, 2013. This revised commitment date will meet the EPRI/MRP Initiative Needed requirement date of no later than December 31, 2013.

This letter contains one revised commitment as summarized in Attachment 1.

If you have any questions or require additional information, please contact William J Steelman, Licensing Manager at (504) 739-6685.

Sincerely,

 for W.J. STEELMAN
MICHAEL E. MASON

WJS/RJP

Attachment:

1. Revised Regulatory Commitment

cc: Mr. Elmo E. Collins, Jr. RidsRgn4MailCenter@nrc.gov
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Attachment 1

To

W3F1-2012-0011

Revised Regulatory Commitment

Revised Regulatory Commitment

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 (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
Entergy Operations, Inc (Entergy) Waterford SES Unit 3 will submit a description of the MRP-227-A reactor vessel internals degradation management program, also referred to as an Aging Management Program (AMP), including the inspection plan, to the NRC for review and approval no later than December 16, 2013.	X		December 16, 2013