

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION IV 1600 E. LAMAR BLVD. ARLINGTON, TX 76011-4511

July 11, 2022

Mr. John Ferrick, Site Vice President Entergy Operations, Inc. 17265 River Road Killona, LA 70057

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 – NOTIFICATION OF NRC DESIGN BASES ASSURANCE INSPECTION (PROGRAMS) (05000382/2022013) AND REQUEST FOR INFORMATION

Dear Mr. Ferrick:

On September 19, 2022, the U.S. Nuclear Regulatory Commission (NRC) will begin an onsite inspection at the Waterford Steam Electric Plant Station, Unit 3. A three-person team will perform this inspection using NRC Inspection Procedure 71111, Attachment 21N.02, "Design-Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements," dated October 9, 2020.

This inspection will evaluate the reliability, functional capability, and design basis of risk-significant power-operated valves as required by 10 CFR 50.55a and applicable 10 CFR Part 50, Appendix A and Appendix B, requirements, and as required by the Waterford Steam Electric Plant Station, Unit 3 operating license. Additionally, the team will perform an inspection of the documentation files to verify that the plant activities associated with safety-related motor-operated valves meet your commitments to Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," and GL 96-05, "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves." In conducting this inspection, the team will select power-operated valves used to prevent and mitigate the consequences of a design basis accident.

The inspection will include an information gathering site visit by the team leader and two weeks of onsite inspection by the team. The inspection team will consist of three NRC inspectors. The current inspection schedule is as follows:

Onsite Information Gathering Visit: August 8, 2022 Preparation Week: September 12, 2022 Onsite Weeks: September 19, 2022, and October 3, 2022 The purpose of the information gathering visit is to meet with members of your staff to become familiar with the power-operated valve activities at Waterford Steam Electric Plant Station, Unit 3. The lead inspector will request a meeting with your personnel to discuss the site power-operated valve procedures. Additionally, the lead inspector will request a discussion with your staff to become familiar with the regulations and standards applicable to power-operated valves at the site. Additional information and documentation needed to support the inspection will be identified during the inspection, including interviews with engineering managers and engineers.

To minimize the inspection impact on the site and to ensure a productive inspection, we have enclosed a request for information needed prior to the inspection. This information should be made available to the lead inspector during the August 8, 2022, visit. Since the inspection will be concentrated on safety-related and risk-significant power-operated valves, a list of such power-operated valves should be available to review during and following the information gathering visit to assist in our selection of appropriate power-operated valves to review.

Additional requests by inspectors will be made during the onsite weeks for specific documents needed to complete the review of specific power-operated valves and associated activities. It is important that all documentation is up-to-date and complete in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection. In order to facilitate the inspection, we request that a contact individual be assigned to each inspector to ensure information requests, questions, and concerns are addressed in a timely manner.

The lead inspector for this inspection is Mr. Wes Cullum. We understand that our licensing contact for this inspection is Mr. Jeff Bradley. If there are any questions about the inspection or the requested materials, please contact the lead inspector by telephone at 817-200-1563 or by e-mail at Wes.Cullum@nrc.gov.

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Sincerely,

Vincent Gaddy, Vincent on 07/11/22

Vincent Gaddy, Chief Engineering Branch 1 Division of Reactor Safety

Docket No:05000382 License No: NPF-38

Enclosures: Request for Information and Valves of Interest

cc w/ encl: Distribution via LISTSERV®

WATERFORD STEAM ELECTRIC PLANT STATION, UNIT 3– NOTIFICATION OF NRC DESIGN BASES ASSURANCE INSPECTION (PROGRAMS) (05000382/2022013) AND REQUEST FOR INFORMATION – JULY 11, 2022

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7/11/22

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Request for Information Design-Basis Capability of Power-Operated Valves WATERFORD STEAM ELECTRIC PLANT STATION, UNIT 3

Inspection Report:	05000382/2022013
EPID Number:	I-2022-013-0002
Information Gathering Dates:	August 8, 2022
Onsite Inspection Dates:	September 19, 2022, and October 3, 2022
Inspection Procedure:	IP 71111, Attachment 21N.02, "Design-Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements"
Lead Inspector:	Wes L. Cullum, Reactor Inspector

I. Information Requested for Information Gathering Visit (August 8, 2022)

The following information should be provided to the lead inspector in hard copy or electronic format, to the attention of the lead inspector by August 8, 2022, to facilitate the reduction in the items to be selected for a final list of components. The inspection team will finalize the selected list during the prep week using the documents requested in this enclosure. The specific items selected from the lists shall be available and ready for review on the day indicated in this request. *Please provide requested documentation electronically in "pdf" files, Excel, or other searchable formats, if possible. The information should contain descriptive names and be indexed and hyperlinked to facilitate ease of use. Information in "lists" should contain enough information to be easily understood by someone who has knowledge of pressurized water reactor technology. If requested documents are large and only hard copy formats are available, please inform the inspection.

- Provide the valve characteristics for the valves listed in the attached list as described in Appendix C of NRC Inspection Procedure 71111, Attachment 21N.02, "Design Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements."
- 2. List of power-operated valves (POVs) important to safety for the Waterford Steam Electric Plant Station, Unit 3. The list should include (a) component identification number; (b) applicable plant system; (c) ASME *Boiler and Pressure Vessel Code* (BPV Code) Class; (d) safety-related or nonsafety-related classification; (e) valve type, size and manufacturer; and (f) actuator type, size, and manufacturer. If the NRC has granted a license amendment to categorize structures, systems, and component in accordance with 10 CFR 50.69, please provide the risk-informed safety category of the structure, system, or component.
- 3. List of POVs sorted by risk importance, including internal and external risk considerations.

- 4. Word-searchable updated final safety analysis report (UFSAR), license conditions, technical specifications, and most recent inservice testing (IST) program plan (and bases document), including any standards that have been committed to with respect to POV capability and testing. Also, identify which UFSAR sections address environmental, seismic, and functional qualification of POVs.
- 5. Provide copies of the latest POV program level procedures or manuals.
- 6. NRC Safety Evaluation Report(s) associated with the IST program including relief and alternative requests submitted in accordance with 10 CFR 50.55a for POVs.
- Provide any responses to NRC Generic Letter (GL) 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," (and its supplements) and GL 96-05, Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves."
- 8. Provide the most recently completed audit, self-assessment, or benchmark of POV programs at Waterford Steam Electric Plant Station, Unit 3.
- 9. List of systems, system numbers/designators, and corresponding names.
- 10. List of site contacts that will be associated with the inspection.

II. Discussions Requested During the Information Gathering Visit

- 1. Interview with a representative to discuss site POV capability analyses, including plant drawings and assumptions. This includes analysis for accident conditions.
- 2. Interview with a representative to discuss POV maintenance elements as integrated into plant programs and procedures.
- 3. Interview with a representative to discuss maintaining the design-basis capability of POVs if they have entered a period of extended operation, if applicable.

III. Information Requested for Inspection Preparation (September 12, 2022) *

- 1. Calculations and/or evaluations associated with the selected POVs, as applicable. For example, these may include those related to motor-operated valve (MOV) torque switch setpoint, MOV terminal (degraded) voltage, maximum expected differential and pressure, torque switch bypass settings, rate of loading, environmental and process conditions during normal/accident operation, seismic and weak-link analysis, and pressure locking and thermal binding, etc. (Ten specific valves will be identified and communicated to you prior to August 22, 2022.)
- 2. Environmental qualification files associated with the selected POVs, as applicable.
- 3. Vendor manuals and technical sheets associated with the selected POVs.

- 4. Provide results (i.e., completed work orders) from the last three performances of diagnostic (static and/or dynamic) testing and inservice testing (stroke time, leak rate, etc.) of the selected POVs.
- 5. Provide performance (or failure) trending data for the selected POVs.
- 6. List of modifications related to the selected POVs.
- 7. List of corrective action program documents, with a brief description, related to the selected POVs over the past five years.
- 8. List of preventive maintenance activities for the selected POVs (valve and actuator). Include the identification number, title and/or description, and frequency.
- 9. System training manuals and/or design basis documents associated with the selected POVs.
- 10. Piping and instrument diagrams for systems related to the selected POVs.
- 11. Tours of the rooms in which the selected POVs are installed. If the inspection will be performed remotely, multiple pictures of selected valve and valve location can be provided. The pictures must have an orientation reference, a size reference, pictures of the surrounding environment, and pictures of the nameplates of both valve and valve operator.

IV. Discussions Requested During the First Inspection Week (September 19, 2022)

- Brief presentation of POV programs at Waterford Steam Electric Plant Station, Unit 3.
- 2. Interviews with representatives to discuss the design-basis capability of POVs based upon the team's review of gathered information.

* Please sort the Section III responses by each selected POV.

Inspector Contact Information:

Wes Cullum (Lead) Reactor Inspector 817-200-1563 Wes.Cullum@nrc.gov Fabian Thomas Reactor Inspector 817-200-1126 Fabian.Thomas@nrc.gov Ron Kopriva Senior Reactor Inspector 817-200-1104 Ron.Kopriva@nrc.gov

Mailing Address:

U.S. NRC, Region IV Attn: Wes L. Cullum 1600 East Lamar Blvd. Arlington, TX 76011-4511

Valves of Interest Design-Basis Capability of Power-Operated Valves WATERFORD STEAM ELECTRIC PLANT STATION, UNIT 3

<u>No.</u>	ACT	Valve Size	Valve Type	System Name	Utility ID
1.	MOV	16	Butterfly	ACC	ACC-110A
2.	AOV	6	Butterfly	ACC	ACC-112A
3.	MOV	3	Gate	BAM	BAM-113B
4.	MOV	3	Gate	BAM	BAM-133
5.	AOV	4	Gate	BD	BD-102A
6.	AOV	20	Butterfly	CC	CC-135A
7.	AOV	8	Butterfly	CC	CC-835A
8.	MOV	4	Gate	CVC	CVC-183
9.	SOV	2	Globe	CVC	CVC-216B
10.	MOV	3	Globe	CVC	CVC-507
11.	AOV	4	Globe	EFW	EFW-223A
12.	AOV	4	Globe	EFW	EFW-229B
13.	AOV	6	Globe	FW	FW-166A
14.	AOV	16	Globe	FW	FW-173A
15.	MOV	8	Butterfly	HVC	HVC-202A
16.	MOV	18	Butterfly	HVR	HVR-304A
17.	MOV	20	Butterfly	HVR	HVR-313B
18.	AOV	8	Globe	MS	MS-116A
19.	MOV	2	Globe	MS	MS-120A
20.	HOV	40	Gate	MS	MS-124B
21.	MOV	6	Gate	MS	MS-401B
22.	MOV	4	Gate	SI	SI-120A
23.	MOV	4	Gate	SI	SI-121B
24.	MOV	10	Gate	SI	SI-125A
25.	MOV	8	Gate	SI	SI-135A
26.	AOV	2	Globe	SI	SI-308A
27.	MOV	14	Gate	SI	SI-401A
28.	MOV	14	Gate	SI	SI-407A
29.	SOV	1.5	Globe	SI	SI-6012
30.	MOV	24	Butterfly	SI	SI-602A