



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 23, 2009

Vice President, Operations  
Entergy Operations, Inc.  
Waterford Steam Electric Station, Unit 3  
17265 River Road  
Killona, LA 70057-3093

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 - REQUESTS FOR RELIEF FROM ASME CODE, SECTION XI VOLUMETRIC EXAMINATION REQUIREMENTS - SECOND 10-YEAR INSERVICE INSPECTION INTERVAL (TAC NOS. ME1426, ME1427, ME1428, ME1429, ME1430, ME1431, ME1432, AND ME1433)

Dear Sir or Madam:

By letter dated June 1, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML091540088), Entergy Operations, Inc. (the licensee), submitted its second 10-year inservice inspection interval Requests for Relief WF3-ISI-007, WF3-ISI-008, WF3-ISI-009, WF3-ISI-010, WF3-ISI-011, WF3-ISI-012, WF3-ISI-013, and WF3-ISI-014 from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, for Waterford Steam Electric Station, Unit 3.

We have reviewed the application and determined that additional information contained in the enclosure is needed to complete the review. The U.S. Nuclear Regulatory Commission staff discussed the need for additional information on July 1, 2009, with Mr. M. Mason and others of your staff. Mr. Mason agreed to provide a response within 90 days of the receipt of this letter.

If you have any questions, please contact me at (301) 415-1480 or by electronic mail at [kaly.kalyanam@nrc.gov](mailto:kaly.kalyanam@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "N. Kalyanam", with a horizontal line underneath.

N. Kalyanam, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure:  
As stated

cc w/encl.: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION  
SECOND 10-YEAR INSERVICE INSPECTION INTERVAL  
REQUESTS FOR RELIEF WF3-ISI-007, WF3-ISI-008, WF3-ISI-009, WF3-ISI-010,  
WF3-ISI-011, WF3-ISI-012, WF3-ISI-013, and WF3-ISI-014  
ENTERGY OPERATIONS, INC.  
WATERFORD STEAM ELECTRIC STATION, UNIT 3  
DOCKET NO. 50-382

1.0 SCOPE

By letter dated June 1, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML091540088), Entergy Operations, Inc. (the licensee), submitted its second 10-year inservice inspection (ISI) interval Requests for Relief (RRs) WF3-ISI-007, WF3-ISI-008, WF3-ISI-009, WF3-ISI-010, WF3-ISI-011, WF3-ISI-012, WF3-ISI-013, and WF3-ISI-014 from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, for Waterford Steam Electric Station, Unit 3 (Waterford 3).

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii), the licensee has submitted the subject RR for limited examinations in multiple ASME Code Examination Categories. The ASME Code requires that 100 percent of the examination volumes, or surface areas, described in ASME Code, Section XI, Tables IWB-2500 and IWC-2500 be performed during each interval. The licensee stated that 100 percent of the ASME Code-required volumes, or surface areas, are impractical to obtain at Waterford 3.

Paragraph 50.55a(g)(5)(iii) of 10 CFR states that when a licensee determines that conformance with ASME Code requirements is impractical at its facility, it shall submit information to support this determination. The U.S. Nuclear Regulatory Commission (NRC) will evaluate such requests based on impracticality, and may impose alternatives, giving due consideration to public safety and the burden imposed on the licensee. Based on the NRC staff's review of the request, it was determined that additional information was required in order for the staff to begin its review of the licensee's submittal dated June 1, 2009.

In most cases, the licensee has provided only general information regarding impracticality of obtaining ASME Code-required volumetric examination, as applicable. Statements such as "scanning obstructions and geometric surface conditions," "design configurations," "nozzle-to-head configuration," and "due to transition of the nozzle adjacent to the weld toe," are inadequate to explain the bases for not obtaining the ASME Code-required examination volumes. No sketches with dimensional information showing the causes of limited accessibility have been included..

Enclosure

As requested below, please provide detailed and specific information to support the bases for limited examination in all requests for relief and, therefore, demonstrate impracticality:

- a) Include descriptions (written and/or sketches, as necessary) of the interferences to applied nondestructive examination (NDE) techniques.
- b) As applicable, describe NDE equipment (ultrasonic scanning apparatus), details of the listed obstructions (size, shape, proximity to the weld, etc.) to demonstrate accessibility limitations, and discuss whether alternative methods or advanced technologies could be employed to maximize ASME Code coverage.
- c) Fully clarify the wave modality and insonification angles used for all ultrasonic examinations.
- d) Show cross-sectional coverage plots to describe ASME Code volumes examined.
- e) If surface examination is required by the ASME Code in addition to the volumetric examination, state whether surface examinations were performed on any of the subject components and state examination coverage that was obtained.
- f) If not included, state whether any indications were discovered as a result of Code-required examinations, and how these indications have been dispositioned.

July 23, 2009

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Sincerely,  
*/RA/*

N. Kalyanam, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure:  
As stated

cc w/encl.: Distribution via Listserv

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ADAMS Accession No. ML091830003

\*Minor editorial changes only from staff RAI

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DATE	7/20/09	7/6/09	6/26/09	7/22/09	7/23/09

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