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W3F1-2015-0003

February 26, 2015

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
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SUBJECT: Fourth Six Month Status Report for Implementation of Order EA-12-049, Commission Order Modifying License With Regard To Requirements for Mitigation Strategies for Beyond-Design-Basis External Events Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

- References:**
1. NRC Order Number EA-12-049, "Order to Modify Licenses With Regard To Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (ADAMS Accession No. ML12054A736)
 2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, dated August 29, 2012 (ADAMS Accession No. ML12229A174)
 3. Nuclear Energy Institute (NEI) 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August 2012 (ADAMS Accession No. ML12221A205)
 4. Entergy letter to NRC, "Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated October 26, 2012 (W3F1-2012-0093) (ADAMS Accession No. ML12300A447)
 5. Waterford Steam Electric Station, Unit 3 letter to NRC, "Overall Integrated Plan in Response to March 12, 2012, Commission Order to Modify Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated February 28, 2013 (ADAMS Accession No. ML13063A266)

- 6 Waterford Steam Electric Station, Unit 3 letter to NRC, "First Six Month Status Report for Implementation of Order EA-12-049, Commission Order Modifying License With Regard To Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" dated August 28, 2013 (ADAMS Accession No. ML13241A281)
- 7 Waterford Steam Electric Station, Unit 3 letter to NRC, "Second Six Month Status Report for Implementation of Order EA-12-049, Commission Order Modifying License With Regard To Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" dated February 28, 2014 (ADAMS Accession No. ML14059A085)
- 8 Waterford Steam Electric Station, Unit 3 letter to NRC, "Third Six Month Status Report for Implementation of Order EA-12-049, Commission Order Modifying License With Regard To Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" dated August 28, 2014 (ADAMS Accession No. ML14241A270)

Dear Sir or Madam:

On March 12, 2012, the NRC issued Order Number EA-12-049 (Reference 1) to Entergy Operations, Inc. (Entergy). The order was immediately effective and required Waterford Steam Electric Station, Unit 3 (Waterford 3) to develop mitigating strategy provisions for beyond-design-basis external events.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an Overall Integrated Plan (OIP). Reference 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3). Reference 4 provided the initial status report regarding mitigating strategies and Reference 5 provided the OIP.

NRC Order EA-12-049 requires submission of a status report at six-month intervals following submittal of the Overall Integrated Plan with regard to the requirements for mitigation strategies for beyond-design-basis external events for Waterford 3. References 6, 7 and 8 provided the first, second and third six-month status reports for Waterford 3 respectively. The purpose of this letter is to provide, as an attachment, the fourth six month status report for the implementation of Order EA-12-049.

There are no new commitments identified in this submittal. Should you have any questions concerning the content of this letter, please contact John Jarrell, Regulatory Assurance Manager, at (504) 739-6685.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 26, 2015.

Sincerely,



MRC/AJH

Attachment: Waterford Steam Electric Station, Unit 3, Fourth Six Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to the Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

cc: Attn: Director, Office of Nuclear Reactor Regulation
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Attachment

W3F1-2015-0003

**Waterford Steam Electric Station, Unit 3,
Fourth Six Month Status Report for the Implementation of Order EA-12-049,
Order Modifying Licenses with Regard to the Requirements for
Mitigation Strategies for Beyond-Design-Basis External Events**

**Waterford Steam Electric Station, Unit 3,
Fourth Six Month Status Report for the Implementation of Order EA-12-049,
Order Modifying Licenses with Regard to the Requirements for
Mitigation Strategies for Beyond-Design-Basis External Events**

1 Introduction

Waterford Steam Electric Station, Unit 3 (Waterford 3), developed an Overall Integrated Plan (OIP) (Reference 1 in Section 8) documenting the diverse and flexible strategies (FLEX) in response to NRC Order EA-12-049 (Reference 2). This attachment provides a planned update of milestone accomplishments since submittal of the last status report (Reference 6), including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since July 31, 2014, and are current as of January 31, 2015.

- Third Six-Month Status Report —August 2014
- Fourth Six-Month Status Report — Complete with submission of this document in February 2015

3 Milestone Schedule Status

The following provides an update to the milestone schedule to support the OIP. This section provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

Milestone	Target Completion Date **	Activity Status	Revised Target Completion Date
Submit Overall Integrated Plan	Feb 2013	Complete	N/A
Submit Six Month Updates:			N/A
Update 1	Aug 2013	Complete	N/A
Update 2	Feb 2014	Complete	N/A
Update 3	Aug 2014	Complete	N/A
Update 4	Feb 2015	Complete	N/A
Update 5	Aug 2015	Not Started	No Change
Perform Staffing Analysis	Nov 2015	Not Started	June 2015

Milestone	Target Completion Date **	Activity Status	Revised Target Completion Date
Modifications:			
Engineering and Implementation			
N-1 Walkdowns	May 2014	Complete	N/A
Design Engineering	Dec 2014	Started	March 2015
Implementation Outage	Nov 2015	Not Started	No Change
On-site FLEX Equipment			
Purchase	Dec 2014	Started	March 2015
Procure	Sept 2015	Started	No Change
Off-site FLEX Equipment			
Develop Strategies with NSRC	April 2015	Started	Sept 2015
Install Off-Site Delivery Station (if Necessary)	Nov 2015	Not Started	No Change
Procedures			
Create Waterford FSGs	Nov 2015	Started	No Change
Create Maintenance Procedures	Nov 2015	Not Started	No Change
Training			
Develop Training Plan	May 2015	Started	No Change
Implement Training	Nov 2015	Not Started	No Change
Submit Completion Report	Feb 2016*	Not Started	No Change

* This date corresponds to the last six month status report and provides time to compile the report following the completion of the fall 2015 Implementation Outage.

** Target Completion Date is the last submitted date from either the overall integrated plan or previous six-month status reports

4 Changes to Compliance Method

During the design phase of the Waterford 3 (WF3) FLEX project, a change was identified to the compliance strategy as described in the Overall Integrated Plan (Reference 1) and 3rd Six Month Update Report (Reference 6). The change is described below and will be incorporated into a future update.

- NEI 12-06 Rev 0 stipulates that provisions for an additional set of portable on-site equipment is essential to provide reasonable assurance that N set of FLEX equipment will remain deployable to assure success of the FLEX strategies. A subset of this portable on-site equipment are hoses and cables required to implement the FLEX

strategies. The N set of hoses and cables are protected from all extreme external hazards. As an alternate approach, an additional length of hoses and cables will be stored with the N set of equipment rather than storing a complete second set in the “N+1” Storage Building. This spare capability supports the safety functional requirements beyond the minimum necessary to support the N-units on-site, and is consistent with the industry-proposed Revision 1 to NEI 12-06 draft.

The additional length of hoses and cables to be stored with the “N” set of equipment will be the longer of 10% of the total hose/cable run or the longest segment of hose/cable. The 10% criteria extends separately to each size or type of hoses and cables. The hoses and cables utilized by the WF3 FLEX strategy are not one continuous hose or cable but rather are composed of smaller sections joined together to form a sufficient length.

Hoses and cables are passive devices unlikely to fail provided they are appropriately inspected and maintained. The hoses and cables for WF3 will be stored in robust storage locations within the Nuclear Plant Island Structure (NPIS), accessible following an extreme external hazard, and will be maintained in accordance with industry recommendations through the Entergy Fleet PM Basis templates. The storage of additional spare cables and hoses for WF3 along with the “N” set provides additional assurance that the FLEX strategy can be implemented for all events even if a segment of the hoses or cables were to be damaged during the strategy implementation.

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

Waterford 3 expects to comply with the order implementation date and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Interim Staff Evaluation

The following table provides a summary and status of any open items documented in the overall integrated plan and any open items or confirmatory items documented in the Interim Staff Evaluation (ISE). A fourth table includes a listing of Audit Questions and the status of each item.

Overall Integrated Plan Open Item	Status
<p>OI1. The suction path from the TDEFWP to the WCTs would be through a non-running ACCWS pump post-ELAP. It is expected that both the TDEFWP and the currently sized EFW FLEX pump (primary strategy) will have sufficient capability and/or NPSH to do so. However, this will need to be confirmed more fully as the detailed design of the primary strategy for maintaining core cooling and heat removal evolves (with SGs available).</p>	<p>Closed - Change to the strategy includes new modifications to allow a gravity drain from WCTs directly to the TDEFW suction, bypassing the non-running ACCWS pump and any high points in the associated piping.</p>

Overall Integrated Plan Open Item	Status
<p>O12. An analysis will be needed to demonstrate that containment pressure and temperature will stay at acceptable levels throughout the ELAP event and that no containment spray system will be required as part of FLEX.</p>	<p>Closed - Containment spray will not be required as part of FLEX. This item addressed by updated AQ WF3-030 response.</p>
<p>O13. At this stage of the conceptual design, the chemistry effects of alternate cooling source (ACS) use on secondary wetted components are unknown.</p>	<p>Closed - The effects of utilizing the FLEX cooling water sources have been evaluated and determined to have minimal impact on FLEX credited equipment. The FLEX strategy utilizes the available cooling sources in order of best quality consistent with NEI FAQ 2013-11.</p>
<p>O14. It is currently unclear how long gravity feed from the SITs can be maintained during Modes 5 and 6 in Phase 1. The ability to gravity feed depends upon SIT fluid height/backpressure, line losses through the gravity flow path, and developed pressure within the RCS. If this time is sufficiently short, Waterford 3 may choose to pre-stage requisite FLEX equipment in Modes 5 and 6.</p>	<p>Closed - The SITs are assumed to be not available in Modes 5 and 6. RCS makeup will be provided by the new FLEX Core Cooling Pump in Modes 5 and 6.</p>
<p>O15. It is expected that only the component cooling water system and dry cooling towers will need to be made operational to reject the heat load generated post-ELAP in Phase 3. However, this must be investigated more fully to confirm such. Notably, only 60% of the dry cooling tower fan motors are currently missile protected and none of the wet cooling tower (WCT) fan motors are missile protected. If more than 60% of dry cooling tower (DCT) capacity is needed to support Phase 3, DCT and/or WCT fan motors may need to be missile protected. Currently available information follows: The DCT one train heat removal in an accident would be 113.38 Mbtu/hr. Given that 60% of the DCT is missile protected, it's assumed that that 40% of the heat removal capability is lost. 38 hours after shutdown, decay heat is less than 68 Mbtu/hr (ANS 79 decay heat curve) and less than the heat removal capacity of the DCTs. As the event</p>	<p>Closed - The WF3 FLEX strategy extends Phase 2 coping by continuing to feed the SGs with either the NSRC equipment or the onsite FLEX Water Transfer Pumps.</p>

Overall Integrated Plan Open Item	Status
<p>proceeds, the required heat removal will decrease. Until this point in the event, Phase 1 and 2 FLEX strategies will be capable of removing decay heat. Final system operating details for the CCW and DCT (i.e., number of pumps and fans to operate) still need to be determined.</p>	

Interim Staff Evaluation Open Items		Status
3.1.3.A	<p>Wind Hazard Screening - The licensee's response fails to consider the warning time offered by a hurricane storm for pre-staging FLEX equipment. In addition, as described in NEI 12-06, Section 7.2.2, hurricanes can have a significant impact on local infrastructure, e.g., downed trees and flooding that should be considered in the interface with off- site resources.</p>	<p>The site takes considerable actions depending on the severity of an incoming storm or flood, up to and including conducting a plant shutdown followed by a cooldown to Mode 5. At least one set of FLEX equipment is protected from all hazards ("robust" per NEI 12-06) and is pre-staged by design.</p>
3.2.1.1.B	<p>CENTS - Justify conformance with the limitations of the use of CENTS by providing the CENTS-calculated value of the centered one-hour moving average of the flow quality at the top of the SG tubes, which corresponds to the maximum void fraction of 0.2 in SG tubes as conditions used to define termination of single phase natural circulation, and confirming that the value is less than the limit specified in the white paper dated September 24, 2013 for use in defining the onset of reflux being.</p>	<p>The site-specific CENTS cases have been re-evaluated to conform to the limitations of the use of CENTS. The transition to reflux cooling considered is based on the flow quality at the top of the SG U-tubes. The transition is assumed to occur once the flow quality exceeds 0.10 based on a one hour center moving average. This is in conformance with the use of CENTS as approved by the NRC in ML13276A555 (e.g., CENTS analysis is utilized to project when the transition to reflux cooling is projected and</p>

Interim Staff Evaluation Open Items		Status
		<p>strategy based actions are taken prior to this transition to provide makeup).</p> <p>Updated response to AQ WF3-017 has been provided on the ePortal. See also response to AQ WF3-019.</p>
3.2.1.2.A	RCP Seal Leakage - Justification of less than 15 gpm per RCP seal leakage in analysis.	As reported in Second Six Month Update, the RCP seal leakage for Waterford is assumed to be no greater than 15 gpm per RCP, consistent with WCAP-17601-P. This item addressed by AQ WF3-018 response.
3.2.1.2.B	RCP generic seal question regarding: (1) the analysis used to determine the leakage rate, (2) cold leg subcooling, (3) leakage flow path characteristics after seal failure, (4) seal performance at high temperatures, (5) isolation of controlled bleed off lines, and (6) pressure dependent seal leakage rates.	This item addressed by AQ WF3-018 response.
3.2.1.3.A	Decay Heat -Assumption 4 on page 4-13 of WCAP-17601 states that decay heat is per ANS [American Nuclear Society] 5.1-1979 + 2 sigma, or equivalent. Address the applicability of assumption 4 to Waterford. If the ANS 5.1- 1979 + 2 sigma model is used in the Waterford ELAP analysis, address the adequacy of the use of the decay heat model in terms of the plant-specific values of the following key parameters: (1) initial power level, (2) fuel enrichment, (3) fuel burnup, (4) effective full power operating days per fuel cycle, (5) number of fuel cycles, if hybrid fuels are used in the core, and (6) fuel characteristics (addressing whether they are based on the beginning of the cycle, middle of the cycle, or end of the cycle). If a different decay heat model is used, describe the specific model and address the adequacy of the model and the analytical results.	This item addressed by AQ WF3-021 response.

Interim Staff Evaluation Open Items		Status
3.2.1.8.A	Core Sub-Criticality- Regarding boron mixing, the NRC staff has not yet accepted the PWROG [Pressurized Water Reactor Owners Group] position paper on boron mixing. Therefore, additional technical justification will be needed to resolve this issue, both generically and on a plant-specific basis.	The NRC has accepted the PWROG position paper on boron mixing per ML13276A183. Waterford conforms to the industry boron mixing position. This item addressed by AQ WF3-017 response.
3.2.4.2.A	Ventilation - Adequacy of ventilation in the control room to protect energized equipment throughout the entire ELAP event, especially if the ELAP is due to high temperature hazard.	This item addressed by updated AQ WF3-032 response.
3.2.4.2.B	Ventilation- Effects of elevated temperatures in the battery room, especially if the ELAP is due to a high temperature hazard.	This item addressed by updated AQ WF3-032 response.
3.2.4.2.C	Ventilation - Hydrogen concentration in the battery rooms during recharging	This item addressed by updated AQ WF3-032 response.
3.2.4.2.D	Ventilation - Loss of ventilation and any potential impacts on the necessary equipment in the TDEFW pump room.	This item addressed by updated AQ WF3-032 response.
3.2.4.4.A	Lighting - Review the licensee's assessment of the habitability/accessibility requirements to ensure lighting is appropriately addressed.	This item addressed by updated AQ WF3-034 response.
3.2.4.8.A	Electrical Power Sources/Isolation and Interactions- Provide a summary of the sizing calculations used to determine the adequacy of the FLEX generators used to power plant electrical equipment.	This item addressed by updated AQ WF3-041 response.
3.2.4.10.A	Load Reduction to Conserve DC Power - The licensee's Integrated Plan on Page 7 identifies dc load shed at hour 1 and 4. With regard to the load shedding of the dc bus in order to conserve battery capacity: <ul style="list-style-type: none"> a. Provide the dc load profile for the mitigation strategies to maintain core cooling, containment, and SFP cooling during all modes of operation. In your response, describe any load shedding that is assumed to occur and the actions necessary to complete each load shed. Also provide a detailed discussion on the loads that will be shed from the dc bus, the equipment location (or location where the required action needs to be taken), and the required operator actions necessary and the time to complete 	This item addressed by updated AQ WF3-041 response.

Interim Staff Evaluation Open Items		Status
	<p>each action. In your response, explain which functions are lost as a result of shedding each load and discuss any impact on defense-in- depth strategies and redundancy.</p> <p>b. Identify any plant components that will change state if vital ac or dc power is lost or de-energized during the load shed.</p> <p>c. Provide the minimum voltage that must be maintained and the basis for the minimum voltage on each battery/dc bus during each Phase under all MODES of operation (consider the impact of reduced loading as a result of load shedding).</p>	

Interim Staff Evaluation Confirmatory Items		Status
3.1.1.1.A	Seismic Protection - Licensee to ensure that: 1) seismic interactions to ensure equipment is not damaged by non-seismically robust equipment or structures for portable equipment that will be stored outside; 2) how large FLEX equipment such as pumps and power supplies stored inside seismic structures is appropriately secured to protect them during a seismic event; and, 3) where other portable equipment such as hoses and power cables would be stored to assure proper protection from a seismic event.	This item is addressed by AQ WF3-001 response.
3.1.1.2.A	Seismic Deployment - Protection of the connection points for Reactor Coolant System (RCS) inventory control during the final phase is yet to be determined (TBD).	This item addressed by updated AQ WF3-003 response.
3.1.1.2.B	Seismic Protection - Protection of the tow vehicle used to move the spare or "N+1" FLEX generator. (Also tied into to the ability to move equipment in the flooding context discussed in Section 3.1.2.2 and wind protection for the vehicle discussed in Section 3.1.3.2)	This item is addressed by AQ WF3-004 response.
3.1.1.3.A	Seismic Procedural Interface - Seismic hazards associated with large internal flooding sources that are not seismically robust and do not require ac power, and the use of ac power to mitigate ground water in critical locations.	In Progress - This item is partially addressed by updated AQ WF3-005 response.
3.1.1.4.A	Seismic Off site resources - The licensee has not yet identified the local staging area and method of transportation to the site.	In Progress - This item will be addressed by updated AQ WF3-006 response when information is available.

Interim Staff Evaluation Confirmatory Items		Status
3.1.2.2.A	Flooding Deployment- Implementation of flooding persistence into their FLEX strategies for pre-event staging of FLEX equipment.	In Progress - This item is partially addressed by updated AQ WF3-007 response.
3.1.2.3.A	Flooding Procedural Interface- Deployment of portable equipment in flooded conditions not incorporated into flood procedures or the need to deploy temporary flood barriers and extraction pumps necessary to support deployment.	This item addressed by updated AQ WF3-009 response.
3.1.3.2.A	Wind Deployment - Whether procedures and programs will include taking proactive actions such as testing, connecting, and readying exposed portable equipment to reduce the potential for wind impacts.	This item addressed by AQ WF3-012 response.
3.2.1.1.A	CENTS - Verify the use of CENTS in the ELAP analysis for Waterford is limited to the flow conditions before reflux boiling initiates. This includes providing a justification for how the initiation of reflux boiling is defined.	This item is addressed by updated AQ WF3-020 response.
3.2.1.4.A	Initial Values for Key Plant Parameters and Assumptions- Review analysis of UHS [Ultimate Heat Sink] (licensee open item OI5)	NRC Confirmatory Action This item is related to OI5, which has been closed.
3.2.3.A	Containment Functions Strategies - Review the results of the finalized containment analysis associated with open item OI2 of the Integrated Plan, which shows that containment functions will be (potentially) restored and maintained in response to an ELAP event.	This item is addressed by updated AQ WF3-030 response.
3.2.4.4.B	Communications - Confirm that upgrades to the site's communications systems have been completed.	NRC Confirmatory Action
3.2.4.5.A	Protected and Internal Locked Area Access- Verify access plans are incorporated into FLEX strategies.	This item is addressed by AQ WF3-035 response.
3.2.4.6.A	Personnel Habitability - Review the licensee's assessment of the habitability/accessibility requirements in all critical areas.	This item is addressed by AQ WF3-033 response.
3.2.4.7.A	Water Sources -Verify the evaluation of the suction path from the TDEFWP to the WCTs [Wet Cooling Towers] through a non-running ACCWS [Auxiliary Component Cooling Water System] pump post-ELAP confirms it is viable.	NRC Confirmatory Action This item is related to OI1, which has been closed.

Interim Staff Evaluation Confirmatory Items		Status
3.2.4.7.B	Water Sources - Description of how the licensee would get water from the Mississippi River to the FLEX pumps.	This item is addressed by updated AQ WF3-036 response.
3.2.4.8.B	Electrical Power Sources/Isolation and Interactions - Licensee to provide the level of detail of the FLEX instrumentation to ensure that electrical equipment remains protected (from an electrical standpoint- e.g., power fluctuations). Also, confirm electrical isolation to ensure that the portable/FLEX diesel generators are isolated from Class 1 E diesel generators to prevent simultaneously supplying power to same Class 1 E bus.	This item is addressed by AQ WF3-038 response.
3.2.4.9.A	Portable Equipment Fuel - Diesel fuel oil supply for the diesel driven pump and how continued operation to ensure core cooling is maintained. Diesel fuel oil supply (e.g., fuel oil storage tank volume, supply pathway, etc.) for the FLEX generators and how continued operation to ensure core and SFP cooling is maintained indefinitely (i.e., Phase 2 and 3).	This item is addressed by AQ WF3-039 response.
3.2.4.9.B	Portable Equipment Fuel - Discuss how fuel quality will be maintained.	This item is addressed by AQ WF3-039 response.

Audit Question Open Items	Status	Completion or Target Date
WF3-001	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.1.1.1.A)	See ePortal
WF3-002	In progress - Updated response available on the ePortal	See ePortal August 2015
WF3-003	Updated response available on the ePortal (associated with ISE Confirmatory Item 3.1.1.2.A)	See ePortal
WF3-004	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.1.1.2.B)	See ePortal
WF3-005	In Progress - Updated response available on the ePortal (associated with ISE Confirmatory Item 3.1.1.3.A)	See ePortal August 2015
WF3-006	In Progress - Updated response available on the ePortal (associated with ISE Confirmatory Item 3.1.1.4.A)	See ePortal
WF3-007	In progress - Updated response available on the ePortal (associated with ISE Confirmatory Item 3.1.2.2.A)	See ePortal August 2015
WF3-008	Closed* Response available on the ePortal	See ePortal

Audit Question Open Items	Status	Completion or Target Date
WF3-009	Updated response available on the ePortal (associated with ISE Confirmatory Item 3.1.2.3.A)	See ePortal
WF3-010	Closed* Response available on the ePortal	See ePortal
WF3-011	Closed* Response available on the ePortal	See ePortal
WF3-012	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.1.3.2.A)	See ePortal
WF3-013	Closed* Response available on the ePortal	See ePortal
WF3-014	Closed* Response available on the ePortal	See ePortal
WF3-015	Closed* Response available on the ePortal	See ePortal
WF3-017	Updated response available on the ePortal (associated with ISE Open Items 3.2.1.1.B, & 3.2.1.8.A)	See ePortal
WF3-018	Updated response available on the ePortal (associated with ISE Open Item 3.2.1.2.A & 3.2.1.2.B)	See ePortal
WF3-019	Closed* Response available on the ePortal (associated with ISE Open Item 3.2.1.1.B)	See ePortal
WF3-020	Updated response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.1.A)	See ePortal
WF3-021	Closed* Response available on the ePortal (associated with ISE Open Item 3.2.1.3.A)	See ePortal
WF3-022	Closed* Response available on the ePortal	See ePortal
WF3-023	Updated response available on the ePortal	See ePortal
WF3-024	Updated response available on the ePortal	See ePortal
WF3-025	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.4.7.A)	See ePortal
WF3-026	Updated response available on the ePortal	See ePortal
WF3-027	Closed* Response available on the ePortal	See ePortal
WF3-028	In Progress - Updated response available on the ePortal.	See ePortal August 2015
WF3-029	Updated response available on the ePortal	See ePortal
WF3-030	Updated response available on the ePortal (associated with ISE Confirmatory Item 3.2.3.A)	See ePortal
WF3-031	Updated response available on the ePortal	See ePortal

Audit Question Open Items	Status	Completion or Target Date
WF3-032	Updated response available on the ePortal (associated with ISE Open Items 3.2.4.2.A, 3.2.4.2.B, 3.2.4.2.C, 3.2.4.2.D)	See ePortal
WF3-033	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.4.6.A)	See ePortal
WF3-034	Updated response available on the ePortal (associated with ISE Open Item 3.2.4.4.A)	See ePortal
WF3-035	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.4.5.A)	See ePortal
WF3-036	In progress - Updated response available on the ePortal (associated with ISE Confirmatory Item 3.2.4.7.B)	See ePortal August 2015
WF3-038	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.4.8.B)	See ePortal
WF3-039	Closed* Response available on the ePortal (associated with ISE Confirmatory Items 3.2.4.9.A and 3.2.4.9.B)	See ePortal
WF3-040	Updated response available on the ePortal	See ePortal
WF3-041	Updated response available on the ePortal (associated with ISE Open Items 3.2.4.8.A & 3.2.4.10.A)	See ePortal

*Closed indicates that Entergy's response is complete.

7 Potential Interim Staff Evaluation Impacts

In addition to the changes to compliance methods identified in Section 4 and the items identified in Section 6, the item discussed below has a potential impact on the Interim Staff Evaluation.

- WF3 has determined that the available, robust water sources for ELAP response are adequate to extend coping to greater than 72 hours, after which NSRC equipment would be available and in place to replenish the necessary water inventories. In order to provide margin to the final strategy, additional water transfer capability is staged onsite. Water sources, and water transfer from the Mississippi River to the plant, are discussed by the ISE in Section 3.2.4.7.

8 References

The following references support the updates to the Overall Integrated Plan described in this Attachment.

1. Waterford Steam Electric Station, Unit 3 letter to NRC, "Overall Integrated Plan in Response to March 12, 2012, Commission Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated February 28, 2013 (ADAMS Accession No. ML13063A266)

2. NRC Order Number EA-12-049, "Order to Modify Licenses With Regard To Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (ADAMS Accession No. ML12054A736).
3. Waterford Steam Electric Station, Unit 3 letter to NRC, "First Six Month Status Report for Implementation of Order EA-12-049, Commission Order Modifying License With Regard To Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" dated August 28, 2013. (ADAMS Accession No. ML13241A281)
4. NRC letter to Entergy Operations, Inc. - Waterford Steam Electric Station, Unit 3 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12- 049 (Mitigation Strategies) (TAC No. MF0977), dated November 22, 2013 (ADAMS Accession No. ML13220A402)
5. Waterford Steam Electric Station, Unit 3 letter to NRC, "Second Six Month Status Report for Implementation of Order EA-12-049, Commission Order Modifying License With Regard To Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" dated February 28, 2014 (ADAMS Accession No. ML14059A085)
6. Waterford Steam Electric Station, Unit 3 letter to NRC, "Third Six Month Status Report for Implementation of Order EA-12-049, Commission Order Modifying License With Regard To Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" dated August 28, 2014 (ADAMS Accession No. ML14241A270)