

## **NRR-PMDAPEm Resource**

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**From:** Kalyanam, Kaly  
**Sent:** Tuesday, October 22, 2013 11:29 AM  
**To:** PELLEGRIN, BRYAN J (BPELLEG@entergy.com)  
**Cc:** Burkhardt, Janet  
**Subject:** Acceptance Review Result for Waterford 3 Request for Relief, W3-ISI-022 (TAC No. MF2814)

The SUNSI information as follows:

Plant: Waterford Steam Electric Station, Unit 3

Docket No.: 50/382

Subject: Acceptance Review Report on Request for Relief No. W3-ISI-022

TAC No.: MF2814

SUNSI Review Done: Yes.

Publicly Available, Normal Release, Non-sensitive,

From: N. Kalyanam

To: Bryan Pellegrin

Subject: Acceptance Review Result for Waterford 3 Request for Relief, W3-ISI-022 (TAC No. MF2814)

Bryan:

By letter dated August 27, 2013, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13239A356), Entergy Operations Inc. (Entergy, the licensee) requested relief from the requirements of the ASME, Boiler and Pressure Vessel Code (Code), Section XI pertaining to the period pressure testing requirements for Waterford Steam Electric Station Unit 3 (Waterford 3) reactor vessel head flange seal leak detection piping. Entergy has determined that compliance with the specified pressure test requirements of this section would result in hardship and unusual difficulty without a compensating increase in the level of quality and safety due to the configuration and design of the system.

The proposed alternative is based on ASME Code Case N-805, "Alternative to Class 1 Extended Boundary End of Interval or Class 2 System Leakage Testing of Reactor Vessel Head Flange O-ring Leak Detection System." However, since Code Case N-805 has not been approved by the NRC and is not identified in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," Entergy has made this request.

The purpose of this email is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this relief request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Pursuant to Sections 50.55a(a)(3)(i) and 50.55a(a)(3)(ii) of the *Code of Federal Regulations* (10 CFR), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of Section 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety. The relief request stated that compliance with the requirements of ASME Code would result in a hardship without a compensating increase in the level of quality and safety requested authorization to perform the requested alternative to the Code case requirement pursuant to 10 CFR 50.55a(a)(3)(ii).

The NRC staff has reviewed your Request for Relief, W3-ISI-022, and concluded that it does provide technical information in sufficient detail to enable the staff to proceed with its detailed technical review and make an independent assessment regarding the acceptability of the proposed relief request in terms of regulatory requirements and the protection of public health and safety and the environment.

Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed for the staff to complete its technical review, you will be advised by separate correspondence.

If you have any questions, please contact me at (301) 415-1480.

N (Kaly) Kalyanam  
Project Manager – Waterford 3  
US NRC/NRR/DORL/LPL4

Ref.: Steven C. Vitto/EPNB

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 874

**Mail Envelope Properties** (Kaly.Kalyanam@nrc.gov20131022112900)

**Subject:** Acceptance Review Result for Waterford 3 Request for Relief, W3-ISI-022 (TAC No. MF2814)  
**Sent Date:** 10/22/2013 11:29:25 AM  
**Received Date:** 10/22/2013 11:29:00 AM  
**From:** Kalyanam, Kaly  
**Created By:** Kaly.Kalyanam@nrc.gov

**Recipients:**  
"Burkhardt, Janet" <Janet.Burkhardt@nrc.gov>  
Tracking Status: None  
"PELLEGRIN, BRYAN J (BPELLEG@entergy.com)" <BPELLEG@entergy.com>  
Tracking Status: None

**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3956	10/22/2013 11:29:00 AM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**