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Fuel Misload Event Analysis  
License Amendment Request  
Pre-Submittal Meeting

Waterford 3  
February 8, 2018

# Fuel Misload Event Pre-Submittal Meeting

## Introductions

John Jarrell—Regulatory Assurance Manager

David Viener—Design Engineering Supervisor

Marcel Provensal—Safety Analysis Engineer

Maria Zamber—Regulatory Assurance

Leia Milster—Reactor Engineering Supervisor

Billy Steelman—PWR Fuels Supervisor

Chris Eastus—PWR Fuels

Amy Miller—Westinghouse Fuel Analysis Engineer

Jeff Brown—Westinghouse Fuel Analysis Engineer

# Fuel Misload Event LAR Pre-Submittal Meeting

## Agenda

- Problem Statement
- WF3 Current Licensing Basis
- Submittal Request
- Justification for Change
- Conclusion

# Fuel Misload Event Problem Statement

- Integrated Fuel Burnable Absorber (IFBA) implemented at WF3 in 2006
- Fuel Misload Analysis, given in UFSAR 15.4.3.1, was no longer bounding due to the IFBA
- This condition was entered into the WF3 Corrective Action Program
  - Current operability is being maintained by cycle specific analysis and compensatory measures

# Fuel Misload Event

## Current Licensing Basis

### Background

- Waterford 3 UFSAR 15.4.3.1 describes the fuel misload event
- The current analysis concludes no fuel failure

# Fuel Misload Event Submittal Request

## Request

- Revise UFSAR 15.4.3.1 (Fuel Misload Event) for fuel failure
  - Methodology is consistent with that currently given in UFSAR 15.4.3.1 with the exception that the neutronics code ANC is used instead of ROCS
  - Accounts for Departure from Nucleate Boiling propagation (all rods treated as failed if a single rod in the assembly fails)
  - Prior NRC approval is required for this change

# Fuel Misload Event Justification for Change

- Complies with NUREG-0800 (Standard Review Plan) 15.4.7
- The fuel failure is bounded by the excess load with loss of AC event
- Dose consequences are within the 10CFR50.67 limits approved in Waterford 3 License Amendment 198

# Justification for Change Precedence

- The approach is the same as the Waterford 3 UFSAR with the exception of using ANC
  - The use of ANC is within the applications approved in License Amendment 200
- The NRC recently approved a similar analysis for PVNGS (ML17319A107)



# Fuel Misload Event Conclusion

- Requesting NRC approval to revise WF3 UFSAR 15.4.3.1 Fuel Misload Event
- Submittal in March 2018
- Requesting approval early March 2019 in support of WF3 restart following Refuel 22

# Questions?