



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

May 10, 2018

LICENSEE: Entergy Operations, Inc.
FACILITY: Waterford Steam Electric Station, Unit 3
SUBJECT: SUMMARY OF APRIL 17, 2018, PUBLIC MEETING WITH ENTERGY OPERATIONS, INC., REGARDING RELIEF REQUEST FOR VISUAL INSPECTION OF CHARGING PIPES FOR THE WATERFORD STEAM ELECTRIC STATION, UNIT 3 (EPID L-2018-LLR-0025)

On April 17, 2018, a Category 1 public teleconference was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Entergy Operations, Inc. (Entergy, the licensee). The purpose of the meeting was to discuss with NRC staff a request for alternative to the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). The meeting notice and agenda, dated April 3, 2018, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML18093B206. The NRC staff provided a list of discussion topics, which is available at ADAMS Accession No. ML18093A487. A list of attendees at the meeting is also enclosed to this meeting summary.

By letter dated February 20, 2018 (ADAMS Accession No. ML18051B559), the licensee submitted a request for alternative to the ASME Code. Specifically, the licensee requested that the NRC authorize an alternative to the requirements for visual inspection of charging pipes for the fourth inservice inspection interval. In the course of the review, the NRC staff identified three items where additional information was needed. These three items were described in the discussion topics as noted above. During the teleconference, the staff established that the three items, as worded in the discussion topics, were equivalent to requests for additional information (RAIs). Therefore, the licensee agreed to provide a response to the questions in the discussion topics as a supplement to the application such that NRC staff could evaluate the information as part of its review of the submittal.

The first item pertained to the citation of the relevant regulation under Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a, "Codes and standards." In its submittal dated February 20, 2018, the licensee cited 10 CFR 50.55a(z)(1), "Acceptable level of quality and safety." However, in the submitted request for alternative, the justification for authorization of the alternative specified that the charging pipe was encased within a concrete pipe chase, which prevented visual examination, and that "the subject piping is inaccessible during normal operations without deliberate entry into a TS [Technical Specification] action statement requiring plant shutdown."

The NRC staff considers this justification to be more properly characterized under 10 CFR 50.55a(z)(2), "Hardship without a compensating increase in quality and safety." Therefore, the staff requested that the licensee provide a supplement to the application revising

the regulatory citation from 10 CFR 55.50a(z)(1) to 10 CFR 50.55a(z)(2). The licensee asked whether citing 10 CFR 50.55a(z)(1) was appropriate, as all alternatives must meet an acceptable level of quality and safety. The NRC staff clarified that the hardship of adhering to the ASME Code was the primary driver of submitting the request for alternative, as described in the "Reason for Request" section of the submittal in the letter dated February 20, 2018. That is, if not for this hardship, submitting a request for alternative would not be necessary. Therefore, the request for alternative should be cited for review against 10 CFR 50.55a(z)(2).

The second item requested clarification whether temporary access through the block-out sections (i.e., openings), in the pipe chase will be provided during the visual examination. The licensee responded that the block-out sections will be provided for the visual test, and that the general location of the block-out sections will be included in its response. The licensee also clarified that the block-out sections will be of sufficient size to allow entry by plant personnel.

The third item requested information about the susceptibility of the charging pipe to degradation mechanisms, such as stress corrosion cracking and thermal fatigue. The item also requested operating experience, including inspection results as available and applicable, which could potentially indicate any previous degradation in the subject piping. The licensee responded that it will provide an evaluation of the susceptibility of the subject pipe to known degradation mechanisms. In addition, the licensee stated that it will search its records for operating experience and past inspection results for any indications of past degradation. The licensee also noted that leakage due from the charging pipe to degradation could also be identified by analyzing any increase in the makeup rate of the charging system.

The licensee stated that it plans to submit a response to these RAI items with a supplement to the application within 45 calendar days of the date of the teleconference. No regulatory decisions were reached at this meeting. No member of the public provided comments to the NRC staff after the business portion of the meeting and, thus, no Public Meeting Feedback forms were received.

Please direct any inquiries to me at 301-415-1390 or by e-mail at April.Pulvirenti@nrc.gov.



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Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

APRIL 17, 2018, MEETING WITH ENTERGY OPERATIONS, INC.

REGARDING RELIEF REQUEST FOR VISUAL INSPECTION OF CHARGING PIPES

WATERFORD STEAM ELECTRIC STATION, UNIT 3

U.S. Nuclear Regulatory Commission

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Entergy Operations, Inc.

Michael Besse
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Gordon Pickering
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Public

None

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