



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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November 23, 2018

MEMORANDUM TO: George A. Wilson, Jr., Director
Division of Materials and License Renewal
Office of Nuclear Reactor Regulation

FROM: Eric R. Oesterle, Chief */RA Lois James for/*
License Renewal Project Branch
Division of Materials and License Renewal
Office of Nuclear Reactor Regulation

SUBJECT: COMMUNICATIONS PLAN REGARDING THE RENEWAL OF THE
WATERFORD STEAM ELECTRIC STATION, UNIT 3, RENEWED
OPERATING LICENSE

The enclosed plan describes the key messages regarding the renewal of the operating license for Waterford Steam Electric Station, Unit 3, and the staff's plans to communicate associated information. Implementation of this plan will contribute to our strategic performance goal of ensuring openness in our regulatory process. This plan will facilitate communication within the agency to enable the staff to provide timely, consistent, and understandable information to external stakeholders.

Docket No. 50-382

Enclosure:
As stated

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SUBJECT: COMMUNICATIONS PLAN REGARDING THE RENEWAL OF THE
 WATERFORD STEAM ELECTRIC STATION, UNIT 3, RENEWED OPERATING
 LICENSE DATED NOVEMBER 23, 2018

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DATE:	09/27/2018	09/27/2018	10/01/2018	10/18/2018	11/23/2018

OFFICIAL AGENCY RECORD

COMMUNICATION PLAN REGARDING THE RENEWAL
OF THE WATERFORD STEAM ELECTRIC STATION, UNIT 3, OPERATING LICENSE

Purpose:

The objective of this communication plan is to effectively convey information to both internal and external stakeholders related to issuing a renewed license for the Waterford Steam Electric Station, Unit 3 (WF3) owned by Entergy Operations, Inc. (Entergy or the applicant). The activities include (but are not limited to):

1. Develop, and issue the license package:
 - a. Transmittal letter to Entergy
 - b. WF3 Renewed License
 - c. Appendix A of the WF3 license, Technical Specifications
 - d. Appendix B of the WF3 license Environmental Protection Plan
 - e. Record of Decision (ROD)
 - f. *Federal Register* notice (FRN)
 - g. Commemorative certificates
2. Develop and issue a memorandum from the Executive Director's Office (EDO) to the Advisory Committee on Reactor Safeguards (ACRS) acknowledging their efforts in the WF3 license renewal application (LRA) review and addressing any potential ACRS comments.
3. Develop and issue the 3-day memo from the Director of Office of Nuclear Reactor Regulation (NRR) to the Commission regarding WF3's renewed license
4. Develop internal memos and review steps, as requested
5. Issue progress reports of staff tasks, as appropriate or as requested

This plan includes:

- Background and discussion on Entergy's LRA for WF3
- Key messages to use when communicating with stakeholders on the status of the license decisions
- Communication team, tools, audiences, and other useful information

This communication plan will aid NRC staff in fielding questions about potential issues both within and beyond the scope of the license renewal review.

BACKGROUND:

By letter dated March 23, 2016, Entergy submitted a LRA to renew the operating license NPF-38 for WF3 for a period of 20 years. The current license expires on December 18, 2024. The staff reviewed the LRA in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," and 10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants." Region IV also performed inspections in accordance with Inspection Procedure 71002, "License Renewal Inspection," and will be formally documenting their inspections and conclusion in a memorandum from the Region IV Regional Administrator, to the NRR Office Director. The staff documented the results of its safety review in the "Safety

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Evaluation Report Related to the License Renewal of Waterford Steam Electric Station, Unit 3,” issued August 17, 2018. The staff also documented the results of its final environmental review for WF3 in a supplemental environmental impact statement that was published in November 2018 as NUREG-1437, Supplement 59, “Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Waterford Steam Electric Station, Unit 2.” The ACRS Full Committee will review the staff’s safety evaluation report (SER) and the LRA on November 1, 2018, as a part of its 658th meeting, and is scheduled to issue their findings in a letter to the Commission about 2 weeks after the meeting.

This plan addresses the activities associated with issuing decisions on the renewed operating license for WF3. Technical staff have completed their reviews and await Region IV’s memorandum and the ACRS letter.

KEY MESSAGES:

At this time, the NRC staff is finalizing its license renewal decision for WF3. The standards for issuing a renewed license are contained in 10 CFR 54.29, “Standards for issuance of a renewed license.” Commission policy for issuing a renewed license is clarified in the staff requirements memorandum for SECY-02-0088, “Turkey Point Nuclear Plant, Units 3 and 4, Renewal of Full-Power Operating Licenses,” dated June 5, 2002.

- The review of the WF3 LRA is ongoing at this time. No final decisions have been made for WF3 by the NRC staff. The public timetable for this review is on the NRC website: <https://www.nrc.gov/reactors/operating/licensing/renewal/applications/waterford.html>.
- The current licensing basis is adequate to protect public health and safety, now and into any period of extended operation.
- The NRC staff has completed a comprehensive safety review for WF3 and determined that the applicant demonstrated that aging effects will be adequately managed to support operation of WF3 for an additional 20 years. The ACRS will issue their findings in a letter to the Commission about 2 weeks after the ACRS Full Committee meeting on November 1, 2018.
- The NRC staff also completed an environmental review for WF3, and determined that the environmental impacts of renewing the WF3 operating license are not so great that preserving the option of license renewal for energy-planning decisionmakers would be unreasonable.
- NRC policy is not to comment upon specific details of pre-decisional materials that may or may not be in process of preparation.

AUDIENCE:

Internal Stakeholders include the Commission and NRC staff up to and including the EDO's office.

External Stakeholders

- Applicant/Licensee
- WF3 Site Personnel and the WF3 License Renewal Team
- Potential Petitioners for Hearing (none known at this time)
- Members of Congress
- Nuclear Industry
- Other Federal, State, local, and Tribal Government Officials
- Public Interest Groups
- General Public
- Media

COMMUNICATION TEAM:

The primary responsibility of the communication team is to ensure that consistent, accurate, and timely messages are properly conveyed to stakeholders. The team consists of technical, project management, division leadership, and communication staff. The communications team will consult with each other at and across working and management levels, as necessary, based on the complexity of the issues as they arise:

Headquarters

George A. Wilson, Jr.	301-415-1183	Director, NRR/DMLR
Joseph E. Donoghue	301-415-1183	Deputy Director, NRR/DMLR
Eric R. Oesterle	301-415-1014	Chief, NRR/DMLR/MRPB
Phyllis M. Clark	301-415-6447	Project Manager (Safety), NRR/DMLR/MENB
Araceli Billoch	301-415-3302	Technical Assistant, NRR/DMLR
Benjamin Beasley	301-415-2062	Chief, NRR/DMLR/MENB
Elaine M. Keegan	301-415-8517	Sr. Project Manager (Environmental), NRR/DMLR/MRPB
April L. Pulvirenti	301-415-1390	Project Manager, NRR/DORL
Scott Burnell	301-415-8204	Public Affairs Officer, OPA (HQ)
Anita Ghosh	301-415-0764	Senior Attorney, OGC

Region IV

Victor Dricks	817-200-1128	Senior Public Affairs, Region IV
Frances Ramirez	985-783-6253	Senior Resident Inspector, WF3, Region IV
Chris Speer	985-783-6253	Resident Inspector, WF3, Region IV
William Maier	817-200-1267	State Liaison Officer, Region IV

TOOLS:

The focus of the activities in this communication plan is to deliver key messages consistently to internal and external stakeholders without deviation from the NRC's established positions. External communication tools for communications during this phase of the project could include the following:

- Conference calls and communications on project status with the applicant
- Issuance of FRNs and press releases for major milestones
- Safety Evaluation Report Related to the License Renewal of Waterford Steam Electric Station, Unit 3, August 17, 2018 (ADAMS Package Accession No. ML18228A668)
- NUREG-1437, Supplement 59, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Waterford Steam Electric Station, Unit 3" (ADAMS Accession No. ML18323A103)
- Memorandum from Kriss M. Kennedy, Regional Administrator, Region IV, to Ho. K. Nieh, Director, Office of Nuclear Reactor Regulation, "Waterford Steam Electric Station, Unit 3, License Renewal Application," dated October 30, 2018 (ADAMS Accession No. ML18303A269)
- NUREG-1850, "Frequently Asked Questions on License Renewal of Nuclear Power Reactors," provides standard responses for typical questions regarding license renewal (ADAMS Accession No. ML061110022)
- NRC's License Renewal public website provides key milestone dates and electronic copies of NRC issued documents regarding the review:
<https://www.nrc.gov/reactors/operating/licensing/renewal/applications/waterford.html>.

TIMELINES OF RENEWED LICENSE TASKS:

Approximate timelines, actions, and key aspects for the WF3 renewed license are in the following table:

WF3 license package - Schedule	License Package	EDO-ACRS Memo*	NRR 3-day Commission Notification
Packages to AA/LA	10/02/2018	11/01/2018	10/01/2018
Packages to QTE	10/16/2018	11/08/2018	10/08/2018
Packages to BC	10/23/2018	11/12/2018	10/12/2018
License Package to DORL PM and BC	10/23/2018		
Packages to OGC	11/06/2018	11/19/2018	10/19/2018
EDO-ACRS to DLR DD		11/26/2018	
EDO-ACRS to NRR		12/03/2018	
EDO-ACRS to EDO		12/10/2018	
Briefing: DMLR Mgmt. on WF3 package., if necessary	11/20/2018		11/02/2018
Packages to DMLR DD	11/20/2018		11/02/2018
Briefing: NRR Management, if necessary	11/27/2018		11/09/2018
Packages to NRR	11/27/2018		11/09/2018
Briefing: EDO briefing, if necessary			11/23/2018
NRR send 3-day memo to Commission			12/13/2018
NRR management sign license and certificates and return to PM	12/17/2018		
Signing Ceremony	12/27/2018 or 12/31/2018**		

*approximate dates based on the ACRS letter to the Commission issuance 14 days after ACRS full committee meeting on November 1, 2018 and assuming that there are no comments that need to have a response.

**depending upon when the EPA publishes the notice in the *Federal Register*

QUESTIONS AND ANSWERS (Q&A):

For general Q&A's regarding license renewal, refer to NUREG-1850, "Frequently Asked Questions on License Renewal of Nuclear Power Reactors."

Who issues a renewed operating license for up to an additional 20 years?

The Director, NRR, issues renewed operating licenses after having made the applicable findings, as authorized by 10 CFR 54.29.

Since WF3 has no open contentions with the Atomic Safety Licensing Board as of October 5, 2018, and the period to request a hearing closed on August 1, 2016, the Director, NRR, notifies the Commission in writing three days before issuing the renewed operating licenses.

Is the review of the WF3 license renewal application completed?

The NRC staff has completed a comprehensive safety review for WF3 and determined that the applicant demonstrated that aging effects will be adequately managed to support operation of WF3 for an additional 20 years. The ACRS will issue their findings in a letter to the Commission about 2 weeks after the ACRS Full Committee meeting on November 1, 2018. The timetable for this review schedule is on an NRC public web page:

<https://www.nrc.gov/reactors/operating/licensing/renewal/applications/waterford.html>

What was the result of the staff safety review?

The staff's safety review of WF3 is performed in accordance with 10 CFR Part 54, using guidance in NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants."

The staff found that the applicant had demonstrated that aging effects will be adequately managed to support operation for 60 years without undue risk to the health and safety of the public. The final SER was issued on August 17, 2018.

What was the result of the environmental review?

The NRC staff's recommendation is that the adverse environmental impacts of WF3 license renewal are not great enough to deny the option of license renewal for energy-planning decisionmakers. This recommendation was based on the analysis and findings in NUREG-1437, Supplement 59, the environmental report submitted by Entergy in conjunction with the WF3 LRA, consultation with other Federal, State, and local agencies, the staff's own independent review, and the staff's consideration of public comments received.

Why did the LRA review for WF3 take longer than 22 months?

The LRA review took longer than 22 months because of the RAPTOR-M3G code, as explained below:

In October 2016, during the NRC staff's review of the license renewal application, the NRC staff identified that the analytical code used to evaluate reactor vessel fluence for the period of

extended operation, RAPTOR-M3G, was not previously approved by the NRC. The staff determined that the computer code was a departure from the evaluation method described in the updated final safety analysis report used in establishing the design bases or in the safety analysis. The previously approved methodology was the discrete ordinates transport code, or DORT, which was accepted for general use by the NRC in a Safety Evaluation Report for Westinghouse WCAP-14040, Revision 3.1. The DORT code was incorporated into the WF3 Operating License through License Amendment No. 196 (ADAMS Accession No. ML050120209, Safety Evaluation Report for Westinghouse WCAP-14040, Rev. 3, "Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves."

In January 2017, the applicant performed a 10 CFR 50.59 evaluation and found that a license amendment request was not necessary to adopt RAPTOR-M3G as the current licensing basis fluence method. Consequently, during review of Engineering Change Package 68581, the staff found that updated Final Safety Analysis Report Section 4.3.3.3 was revised to reflect RAPTOR-M3G as the current licensing basis fluence method which is contrary to the fluence method used to develop the current 40-year pressure-temperature limits in technical specifications.

Through further investigation, the NRC staff identified that the licensee commissioned Westinghouse to evaluate reactor vessel fluence using RAPTOR-M3G to ensure that the limits of the heatup and cooldown curves of Technical Specification Figures 3.4-2 and 3.4-3 would not need updating prior to 32 effective-full-power-years. The result of the evaluation using RAPTOR-M3G, was documented in Westinghouse Report WCAP-17969-NP, Rev. 0. This report was submitted to the NRC as required by 10 CFR Part 50, Appendix H, "Reactor Vessel Material Surveillance Program Requirements," on August 6, 2015 (ADAMS Accession No. ML15222A361, Westinghouse Report WCAP-17969-NP, Rev. 0 "Analysis of Capsule 83° from the Entergy Operations, Inc. Waterford Unit 3 Reactor Vessel Radiation Surveillance Program," April 2015.)

As documented in Inspection Report 05000382/2017010 dated August 7, 2017 (ADAMS Accession No. ML17219A723), NRC regional inspectors determined, "that on two separate occurrences, the licensee failed to evaluate and obtain a license amendment, in accordance with 10 CFR 50.59 (c)(2)(viii), for a change to reactor vessel fluence methodology prior to implementing reactor vessel fluence evaluation methodology. This change is a departure from a method of evaluation described in the FSAR (as updated) used in establishing the design bases or in the safety analyses."

On November 28, 2017, the licensee submitted a license amendment request to incorporate the use of the RAPTOR-M3G code into the WF3 current licensing basis. The NRC staff reviewed the license amendment request and supplemental information submitted on December 7, 2017, and May 8, 2018, and has determined that the fluence calculation methodology associated with the RAPTOR-M3G code to be acceptable for use at WF3 for reactor vessel neutron fluence evaluations up to 32 effective full power years. The license amendment was approved by the NRC on July 23, 2018. Approval of the license amendment incorporated the RAPTOR-M3G code into the WF3 current licensing basis thus allowing the license renewal review to proceed to completion.