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10 CFR 50.90
10 CFR 170.11

W3F1-2019-0034

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ATTN: Document Control Desk
Chief Financial Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Letter-of-Intent to Submit License Amendment Requesting Using Digital Instrumentation and Control Interim Staff Guidance-(ISG)-06, Revision 2 and Request for NRC Fee Waiver

Waterford Steam Electric Station, Unit 3
NRC Docket No. 50-382
Renewed Facility Operating License No. NPF-38

The purpose of this letter is to inform the U.S. Nuclear Regulatory Commission (NRC) that Entergy Operations Inc. (Entergy) intends to submit a license amendment request (LAR) for a digital instrumentation and control (DI&C) modification at Waterford Steam Electric Station, Unit 3 (Waterford 3). Entergy will develop and submit this LAR in accordance with the Alternate Review Process (ARP) guidance in NRC DI&C Interim Staff Guidance-(ISG)-06, "Licensing Process," Revision 2 (Reference 1).

The DI&C modification at Waterford 3 will replace the existing instrumentation of the Core Protection Calculator (CPC) system and Control Element Assembly Calculator (CEAC) system with a digital system based on an NRC-approved licensing topical report. Entergy expects to submit this LAR in the first quarter of 2020 to support installation of the modification during the Waterford 3 refueling outage starting in Spring 2022.

In addition, Entergy requests that the NRC review fees associated with the NRC evaluation of this LAR be waived in accordance with 10 CFR 170.11(a)(1)(ii) on the basis that the review of the LAR will assist the NRC in implementing generic regulatory improvements or efforts (i.e., as a "lead plant" or "pilot plant"). The promulgation and eventual implementation of the ARP in DI&C-ISG-06, Revision 2 represents a significant generic regulatory improvement effort, as follows.

The current revision to DI&C-ISG-06 was initiated by the NRC staff in response to an NRC directive to develop an integrated strategy to modernize the NRC's DI&C regulatory infrastructure. This integrated strategy is documented in SECY-16-0070, "Integrated Strategy to Modernize the Nuclear Regulatory Commission's Digital Instrumentation and Control Regulatory Infrastructure," (Reference 2). In this document, the revision to DI&C-ISG-06 is identified as essential to prioritizing and implementing regulatory activities that would be needed to provide near-term regulatory clarity, and support industry confidence to perform digital I&C upgrades.

In SECY-18-0100, "Annual Update Regarding the Integrated Strategy to Modernize the Nuclear Regulatory Commission's Digital Instrumentation and Control Regulatory Infrastructure," (Reference 3), the NRC staff described continued progress in streamlining the licensing review process for major DI&C upgrades. This progress included a pending revision of DI&C-ISG-06 which would include the new ARP. As stated in Reference 3, the ISG revision would reduce the scope of licensee document submittals and provide an alternative for earlier approval, which, unlike the current process, would precede factory acceptance testing, for digital designs that are based on approved topical reports.

On February 22, 2018, the NRC conducted a teleconference with industry stakeholders to discuss the status of a proposed revision to DI&C-ISG-06. This teleconference is documented in an internal NRC memorandum dated May 3, 2018 (Reference 4). During that teleconference, the NRC requested the status for identification of a potential lead plant that would submit a DI&C LAR using the ARP in the draft revision to DI&C-ISG-06. The NRC expressed concerns with potential delays in the identification of a lead plant, and pointed out that the DI&C-ISG-06 revision project was accelerated in order to accommodate a lead plant application.

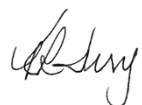
In that Entergy will be the first licensee to utilize the ARP described in DI&C-ISG-06, Revision 2, and given the NRC's desire for a lead plant application to demonstrate the effectiveness of the ARP as part of the DI&C-ISG-06 revision, Entergy believes that the planned LAR submittal satisfies the standard for an NRC review fee waiver described in 10 CFR 170.11(a)(1)(ii).

Entergy respectfully requests a decision on the request for NRC fee waiver as soon as practicable to support timely and efficient scheduling of pre-submittal meetings and LAR development.

This letter contains no new regulatory commitments.

Should you have any questions or require additional information, please contact Stephenie Pyle, Senior Manager, Fleet Regulatory Assurance at 601-368-5516.

Respectfully,



Keith Jury

KJ/jls

- References:
- 1) U.S. NRC Digital Instrumentation and Control Interim Staff Guidance- (ISG)-06, "Licensing Process," Revision 2 (ADAMS Accession No. ML18269A259)
 - 2) SECY-16-0070, "Integrated Strategy to Modernize the Nuclear Regulatory Commission's Digital Instrumentation and Control Regulatory Infrastructure," (ADAMS Accession No. ML16097A182)
 - 3) SECY-18-0100, "Annual Update Regarding the Integrated Strategy to Modernize the Nuclear Regulatory Commission's Digital Instrumentation and Control Regulatory Infrastructure," (ADAMS Accession No. ML18275A327)
 - 4) J. A. Golla (NRC) to D. C. Morey (NRC) memorandum dated May 3, 2018 (ADAMS Accession No. ML18101A151)

cc: NRC Region IV Regional Administrator
NRC Senior Resident Inspector – Waterford Steam Electric Station, Unit 3
NRC Project Manager – Waterford Steam Electric Station, Unit 3