

Waterford 3

**10 CFR 50.69 License
Amendment Request**

NRC Pre-submittal Meeting

June 11, 2020



Participants

Entergy

- Ron Gaston, Director Fleet Regulatory Assurance
- Paul Wood, Waterford 3 Manager, Regulatory Assurance
- Billy Steelman, Waterford 3 Manager, Design Engineering
- Maria Zamber, Waterford 3 Regulatory Assurance
- Richard French, Waterford 3 Project Manager
- Mark Thigpen, Waterford 3 PRA Engineer
- Alan Harris, Jensen Hughes, Licensing Consultant
- Andy Spotts, Jensen Hughes, PRA Consultant

Agenda

- ✓ Introduction/Opening Remarks
- ✓ Waterford 10 CFR 50.69 Overview
 - ✓ PRA Technical Adequacy
 - ✓ Deviations from NEI 00-04
 - ✓ Passive Categorization
 - ✓ Seismic Treatment
- ✓ Schedule
- ✓ Closing Remarks

Waterford 10 CFR 50.69 Overview

- ✓ LAR and Program follow NEI 00-04 (exceptions noted on later slides)
- ✓ 12 month approval requested

PRA Technical Adequacy

- ✓ Internal Events (Including Flooding and Fire)
 - ✓ Probabilistic Risk Assessment (PRA) model technical adequacy previously evaluated by the NRC for TSTF-425 and NFPA 805.
 - ✓ Facts & Observations (F&O) closure peer review performed in October 2017 in accordance with the NEI 05-04 Appendix X approach.
 - ✓ Additional updates/upgrades have been peer reviewed. A Flood and LERF Peer Review was conducted in August 2019.
 - ✓ Changes to the as-built, as-operated plant are reviewed periodically to determine if model impacts require an off-cycle update.
 - ✓ Sensitivity studies will be performed in accordance with NEI 00-04 for areas such as Human Reliability Analysis (HRA) and Common Cause Failures (CCF).
 - ✓ Additional sensitivity studies will be performed to address applicable uncertainties associated with specific system(s) being categorized.

Passive Categorization

- ✓ Passive components and the passive function of active components will be evaluated using the Arkansas Nuclear One (ANO) Risk-Informed Repair/Replacement Activities (RI-RRA) method.
- ✓ The use of this method was previously approved by the NRC in the Vogtle 10 CFR 50.69 application.
- ✓ ASME Code Class 1 SSCs with a pressure retaining function, as well as supports, will be assigned as high safety significant (HSS) for passive categorization. This will result in HSS for its risk-informed safety classification and cannot be changed by the integrated decision-making panel (IDP).

Deviations from NEI 00-04

Seismic Justification Referencing EPRI TR 3002012988

- ✓ Waterford 3 will reference EPRI Technical Report (3002012988) for seismic considerations in the categorization process.
- ✓ Waterford 3 will document justification for being a “Tier 1 Plant” and provide justification to the IDP.
- ✓ Conclusions and results from existing seismic studies, as they apply to the system being categorized, will be included in information provided to the IDP.
- ✓ Waterford 3 will review and incorporate lessons learned and additional considerations from the lead Tier 1 plant, Calvert Cliffs.

Schedule

- LAR Submittal expected by end of July 2020
- Requesting 12 month NRC review and approval to support refueling outage.



Closing Remarks