

NRC REGULATORY CONFERENCE SUMMARY

Licensee: Entergy Operations, Inc.

Facility: Waterford Steam Electric Station, Unit 3

License No.: NPF-38

Docket No.: 50-000382

Date of Conference: July 29, 2022

EA-22-033

NRC REGULATORY CONFERENCE SUMMARY

On July 29, 2022, representatives of Entergy Operations, Inc. (Entergy) and Waterford Steam Electric Station, Unit 3 (Waterford 3) met with U.S. Nuclear Regulatory Commission (NRC) personnel to discuss the apparent violation identified in NRC Inspection Report Number 05000382/2022-501, dated June 11, 2022 (NRC's Agencywide Documents Access and Management System [ADAMS] Accession No. ML22159A275). The regulatory conference was held at the request of the licensee and was characterized as an NRC public meeting. The public participation in the meeting was via a teleconference and WebEx and included public observation of the business portion to the meeting between NRC staff and licensee participants, and a public interaction portion of the meeting that initiated after closure of the business portion. The telephonic and web-based format via WebEx of this regulatory conference was at the request of the NRC to extend the observation of the meeting to additional and external attendees because of the COVID-19 situation and the social distancing posture of the agency. The bridge line used during the telephonic activity was moderated by an external party, Verizon. The list of attendees is provided as an enclosure to this summary (Enclosure 1).

The NRC representatives discussed the preliminary White finding and associated apparent violation that were described in the subject inspection report and provided an overview of NRC's Reactor Oversight Process for significance determination, as shown in the attached NRC presentation (Enclosure 2).

The licensee's Site Vice President, Regulatory Assurance Manager, Strategic Engineering Manager, Assistant Operations Manager, and the Fleet Emergency Planning Director for Entergy's Waterford 3 facility led the presentation of their response to the preliminary White finding and apparent violation, as shown in their enclosed presentation (Enclosure 3). The Entergy participants stated that Entergy accepted the performance deficiency, as generally characterized in the preliminary White finding, but did not agree that the significance of the finding was of low to moderate safety significance (White) due to: (1) their perspective that timely and accurate emergency classification would be provided for via other unaffected Emergency Action Levels (EALs), and (2) their contention that dose assessment capabilities would not be negatively impacted because the main condenser wide range gas monitor would be isolated from use within an hour of a steam generator tube rupture event, or if it wasn't, the worst-case event would not result in projected dose rates at the site boundary that drive any necessary protective actions.

The licensee further indicated that during a radiological release with worst-case conditions would result in dose rates at the site boundary that would not result in necessary protective actions. The licensee asserted that, in the worst-case event the expected dose rate at the site boundary would be 15 millirem per hour, but with the calibration errors included, dose rates projected from the affected wide range gas monitor would be 26 millirem per hour. Due to the assumption in emergency response that the onset of an event can include damaged reactor fuel, which can increase dose rates, the NRC asked how the analysis accounted for fuel clad and fuel damage. The presented analysis assumed the fuel cladding was intact until hours into the assumed scenario. The licensee committed to providing additional information about how their evaluation accounted for a range of fuel clad damage at the onset of the event, and what its effects would be on site boundary dose rates.

Ultimately, the licensee asserted that the safety significance of the apparent finding was of very low safety significance, stating the safety significance of the finding should be Green versus White.

NRC staff communicated it is their goal to complete internal review and deliberations, and communicate decisions made to Entergy within forty-five calendar days.

At the close of the business portion of the meeting, members of the public were invited to ask questions and interact with NRC participants. However, there were no questions or comments from the public, so the NRC adjourned the meeting.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this conference summary and enclosures (Enclosure 1, 2, and 3) will be made available electronically for public inspection in the NRC Public Document room or in the NRC's Agency-wide Documents Access and Management System, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Enclosures:

1. Attendance List - Public
2. NRC Presentation - Public
3. Licensee Presentation - Public

NRC REGULATORY CONFERENCE SUMMARY, ENTERGY OPERATIONS, INC.,
 WATERFORD STEAM ELECTRIC STATION, UNIT 3 – DATED AUGUST 17, 2022

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