

From: Jason Drake
Sent: Wednesday, November 2, 2022 10:55 AM
To: Milster, Leia Elizabeth
Cc: Mackaman, Clyde D
Subject: NRC UPDATE: Completion Date for Waterford 3 LAR to Adopt TSTF-505

Leia,

By letter W3F1-2021-0003 dated February 8, 2020, (ML21039A648), Entergy Operations, Inc. (Entergy) submitted a license amendment request to amend the Technical Specifications for Waterford Steam Electric Station, Unit 3. The proposed amendments would modify Technical Specification requirements to permit the use of risk-informed completion times in accordance with Technical Specifications Task Force (TSTF) Traveler TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times – RITSTF [Risk-Informed TSTF] Initiative 4b," dated July 2, 2018 (TSTF-505 LAR) (ML18183A493). By letter dated March 25, 2021 (ML21069A211), the NRC staff informed Entergy that supplemental information was necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendments in terms of regulatory requirements and the protection of public health and safety and the environment. Entergy provided the requested information by letter dated April 8, 2021 (ML21098A262).

On April 13, 2021, (ML21104A038), the NRC provided its acceptance for review and estimated that it would take approximately 1835 hours to complete its review of the application and that it will complete its review on or by April 2022. Per the original acceptance email, it was indicated that the estimates could change because of several factors, such as requests for additional information (RAI), unanticipated addition of application scope, NRC advisory committee reviews, parallel reviews of industry program initiatives or pilot applications, or hearing-related activities.

You provided access to a Certrec Portal for NRC staff beginning on July 19, 2021. This portal remains open and captures all technical questions asked and responded to in the audit. On October 12-14, 2021, conducted a regulatory audit for the subject TSTF-505 LAR. On January 6, 2022, the NRC sent an email (ML22209A105) to Entergy indicating that information requested in the October 2021 "Technical Specification Change to Adopt Risk-Informed Extended Completion Times – [Risk-Informed Technical Specification Task Force] (RITSTF) Initiative 4B," (TSTF-505 LAR) (ML21039A648) Regulatory Audit, specially pertaining to and impacting the review of the 10 CFR 50.69 LAR review was still not available in the Certrec portal. The information requested included the results of the 10 CFR 50.69 LAR peer review along with Entergy's final decision on whether to use a plant high confidence of low probability of failure (HCLPF) of 0.15g and follow the Farley approach to calculate seismic large early release frequency (SLERF). It was further indicated at this time by the licensing project manager (PM) that the review would extend significantly beyond the 1-year metric. In subsequent conversations with Entergy during bi-weekly calls, the NRC identified that a final determination of a new target amendment issuance date would need to be deferred until Entergy could provide the information required to support the review.

On January 28, 2022, the NRC sent a request for additional information (RAI) to Entergy to capture the critical TSTF-505 LAR responses contained in the Certrec portal. On May 16, 2022, Entergy provided their RAI response (ML22136A310).

This review is further complicated because it supports another amendment request under review, "Title 10 of the Code of Federal Regulations, Section 50.69, "Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors," (10 CFR 50.59 LAR) (ML20353A433). For both the 10 CFR 50.69 LAR review and the RITSTF Initiative 4B amendment review, an additional set of consolidated RAIs was sent on July 15, 2022. (ML22209A108). This set of consolidated RAIs seeks clarification from Entergy on how you intend to satisfy the open internal events probabilistic risk assessment (PRA) facts and observations (F&O). On July 20, 2022, Entergy requested a clarification call to be held on July 21, 2022, for the subject RAIs. Final RAIs were sent to Entergy on July 22, 2022 (ML22206A017). On August 19, 2022, Entergy submitted responses to the consolidated set of RAIs (ML22231B160).

Concurrent with the NRC's development of the consolidated RAIs and Entergy's response submission, other supporting NRC Divisions were finalizing their concurrence reviews. One Branch (NRR/DEX/EEEE), identified during a peer review of the May 16, 2022, TSTF-505 LAR supplement (ML22136A310), found specific errors on Table E1-1 Design Success Criteria (DSC) which required licensee clarification. On August 30, 2022, the NRC submitted five clarification questions to Waterford 3, and on September 19, 2022, a clarification call between the NRC and Entergy was held to discuss the staff's findings. As a result of the call, on October 5, 2022, Entergy placed responses to the five EEEB questions were uploaded to Certrec IMS. As agreed in the clarification call, the NRC reviewers would then review the responses for acceptance and notify Entergy as to which responses should be docketed. On October 6, 2022, the NRC identified to Entergy that responses 2, 3 and 5 would need to be docketed. On October 14, 2022, Entergy submitted the requested responses to the NRC (ML22286A239).

On October 17, 2022, during a routine status call between the NRC and Waterford 3, the NRC project manager (PM) identified that the 10 CFR 50.69 amendment issuance date would be shifting to November 18, 2022, and the TSTF-505 amendment issuance date would be shifting to November 30, 2022, to account for the review of the latest clarification supplement against the respective safety evaluations. In response, Entergy requested that the two amendments be aligned for issuance such that their implementation window of 120 days would not be impacted by a staggered receipt. With respect to the additional factors noted above, and per verbal notice and agreement with Entergy on October 17, 2022, the NRC estimates the review will be completed on or by November 30, 2022. If there are emergent complexities or challenges associated with the review of the TSTF-505 LAR that would result in additional changes to the November 30, 2022, milestone schedule, the reasons for the changes, along with a revised milestone schedule, will be communicated to Entergy during routine interactions with the licensing PM.

If you have any questions, please contact me at (301) 415-8378 or Jason.Drake@nrc.gov.

Regards,

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