

## NRR-DMPSPeM Resource

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**From:** Pulvirenti, April  
**Sent:** Monday, December 18, 2017 1:16 PM  
**To:** Zamber, Maria  
**Cc:** Patel, Amrit; Pascarelli, Robert  
**Subject:** Waterford 3 - Acceptance Review of License Amendment Request for Use of RAPTOR-M3G code for neutron fluence calculations

**Follow Up Flag:** Follow up  
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SUBJECT: WATERFORD UNIT 3 – ACCEPTANCE OF REQUESTED LICENSING ACTION RE: LICENSE AMENDMENT REQUEST FOR USE OF RAPTOR-M3G CODE FOR NEUTRON FLUENCE CALCULATIONS

Maria,

By letter dated November 28, 2017, Entergy (the licensee) submitted a license amendment request for Waterford Unit 3 (Waterford 3). The proposed amendment would revise Section 4.3.3 of the Updated Final Safety Analysis Report (UFSAR) to use the RAPTOR-M3G code for neutron fluence calculations.

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of the amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license must fully describe the changes requested and follow, as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its technical review and make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

It should be noted that for this particular application regarding RAPTOR, the scope of this review, conducted under 10 CFR 50.90, will include only Attachment 1 and Attachment 2 of the November 28, 2017, submittal. Attachments 1 and 2 of the submittal pertain to the use of RAPTOR for the current licensing basis, that is, until the end of the initial 40-year license for Waterford 3, which is scheduled to expire on December 18, 2024. The safety evaluation will apply only to the use of RAPTOR for the initial license for Waterford 3. Attachment 3 of the submittal pertains to a potential period of extended operation. By letter dated December 7, 2017, the licensee clarified that Attachment 3 of this submittal was a supplement to the license renewal application. Attachment 3 will be reviewed as part of the ongoing review of the license application pursuant to 10 CFR 54.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 150 hours to complete. The NRC staff expects to complete this review in approximately 5 months, which is May 1, 2018. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, unanticipated addition of the scope to the review, and review by NRC advisory committees or hearing-related activities. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact the Waterford 3 Project Manager, April Pulvirenti, at (301)-415-1390.

April

Dr. April Pulvirenti  
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**Recipients:**  
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Tracking Status: None  
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Tracking Status: None  
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Tracking Status: None

**Post Office:**

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