

## NRR-DRMAPEm Resource

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**From:** Sebrosky, Joseph  
**Sent:** Tuesday, October 1, 2019 7:48 AM  
**To:** HARRIS, ALAN J  
**Cc:** Pulvirenti, April; Uribe, Juan; Titus, Brett  
**Subject:** info: response to your question regarding status of EC 52043, UHS Margin Restoration - Cooling Tower Recirculation Reduction

Mr. Harris,

The purpose of this email is to provide an answer to your question regarding whether notification to the NRC of a change in the licensee's actions to address a local intense precipitation (LIP) event is needed. The licensee is changing its actions based on the completion of a modification EC 52043 which consists of a flat roof and gutter systems that direct a large portion of the rainfall from a LIP event out of the dry cooling tower (DCT) basin. For the reasons stated below, there is no formal notification to the NRC of the change to the LIP event procedures as a result of the completion of the modifications described in EC 52043. I have copied the operating reactor project manager on this email so she is aware of the conversation.

### Background

In a letter dated August 20, 2019 (ADAMS Accession No. ML19067A247), the staff concluded that Waterford was a Category 1 plant (i.e., no additional regulatory actions is warranted) in regards to the response to the March 12, 2012, 50.54(f) letter associated with reevaluation of flood hazards at the site. The licensee's flooding focused evaluation (FE) dated May 17, 2017 (ADAMS Accession No. ML17137A355), contains no regulatory commitments, however both the licensee's FE and the staff assessment of the FE dated February 26, 2018 (ADAMS Accession No. ML17171A128) discuss what was at that time a pending modification (EC 52043) to divert water from a LIP-type event outside of the DCT sump areas by the roof and gutter system modification. The staff's February 26, 2018, flooding FE assessment states there is additional conservatism in the licensee's evaluation of a LIP event because it does not credit water that will be diverted outside of the DCT sump areas once the modification described in EC 52043 is completed.

The modification was also described in a license amendment request dated March 26, 2018 (ADAMS Accession No. ML18085B196). In the license amendment request EC 52043 is described as a modification to the ultimate heat sink that will restore margin to compensate for non-conservative recirculation impacts and inappropriate wet cooling tower capacity calculations. On June 28, 2019 (ADAMS Accession No. ML19164A001) the staff issued license amendment 254 "Revision of Technical Specification 3/4.7.4 'Ultimate Heat Sink,'" which discusses EC 52043.

### Current Status

Based on the completion of the EC 52043 modification it is the staff's understanding that the licensee intends to change the approach for addressing a LIP type events at the site. Specifically, some actions associated with the DCT basin described in the licensee's May 17, 2017, flooding FE are no longer necessary given the implementation of the modification. The licensee's question is whether the change to the procedures outlined in the February 26, 2018, flooding FE require NRC notification via a letter. Although not specifically described in the August 20, 2019, letter that concluded Waterford was a Category 1 plant, the staff was aware that modification EC 52043 was referenced in an approved license amendment. This served as part of the staff's basis for concluding a regulatory commitment was not warranted to address LIP events at the site. Had the modification not been referenced in the approved license amendment, the staff may have pursued whether a docketed regulatory commitment was appropriate for the site.

### Conclusion

The licensee should appropriately document the change to the procedures in response to a LIP type event that result from the implementation of modification EC 52043 such that they are available for future NRC inspection, however, because there are no regulatory commitments associated with the flooding FE there is no guidance that suggests the NRC should be notified of the changes to the procedures described in the February 26, 2018, flooding FE.

Please let me know if you have any questions related to this issue.

Sincerely,

Joe Sebrosky  
Senior Project Manager  
Beyond-Design-Basis Management Branch  
Office of Nuclear Reactor Regulation  
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