

From: Lewis, John <jlewis8@entergy.com>
Sent: Tuesday, December 14, 2021 1:55 PM
To: Drake, Jason
Subject: [External_Sender] FW: ACTION: Waterford 3 - Request for One-Time Exemption from 10 CFR 50, Appendix E Biennial EP Exercise

Good Afternoon Jason

Please see the below email in reference to yesterday's conversation.
Please call me if you have any questions.

John

From: Ertel, Aaron <aertel@entergy.com>
Sent: Monday, December 13, 2021 4:40 PM
To: Lewis, John <jlewis8@entergy.com>
Cc: Vincent, Donald <dvince2@entergy.com>; Overly, John <joverly@entergy.com>
Subject: RE: ACTION: Waterford 3 - Request for One-Time Exemption from 10 CFR 50, Appendix E Biennial EP Exercise

Per your request,

WF3 Justification Supplement to submitted letter W3F1-2021-0063 from Entergy Operations, Inc. dated October 12, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21285A290)

Entergy made a good faith effort to comply with the regulation in that the biennial exercise was previously scheduled to be performed on 10/26/2021. However, Hurricane Ida made landfall in Southeast Louisiana on 08/29/2021 causing widespread devastation and flooding throughout the Waterford 3 site and surrounding areas. The damage onsite required the station to direct all resources to perform hurricane recovery activities. With the amount of damage to the plant site, and the Offsite Response Agencies (OROs) informing Waterford 3 that they could not support the originally scheduled Exercise date due to the magnitude of destruction in their jurisdictions, the decision was made to postpone the exercise. A reasonable effort was made to reschedule the EP exercise during CY 2021, but it was unsuccessful due to the magnitude of devastation experienced by St. Charles Parish and St. John the Baptist Parish because of Hurricane Ida.

Let me know if you agree we have satisfied the NRC's request.

Aaron Ertel
Emergency Planning
Entergy - Waterford 3
504-739-6406

From: Lewis, John <jlewis8@entergy.com>
Sent: Monday, December 13, 2021 3:33 PM
To: Overly, John <joverly@entergy.com>; Ertel, Aaron <aertel@entergy.com>; Vincent, Donald

<dvince2@entergy.com>

Subject: FW: ACTION: Waterford 3 - Request for One-Time Exemption from 10 CFR 50, Appendix E Biennial EP Exercise

John O.

Please see the emailed example below from our NRR Project Manager, Jason Drake. Please make best efforts to satisfy this request as soon as possible.

Please call me if you have any questions.

John L.

From: Drake, Jason <Jason.Drake@nrc.gov>

Sent: Monday, December 13, 2021 12:11 PM

To: Mackaman, Clyde D <cmackam@entergy.com>; HARRIS, ALAN J <aharris@entergy.com>; Lewis, John <jlewis8@entergy.com>; Gaston, Ronald William <rgasto1@entergy.com>; Couture III, Philip <pcoutur@entergy.com>; Mahan, Cecil <cmahan@entergy.com>

Cc: Dixon-Herrity, Jennifer <Jennifer.Dixon-Herrity@nrc.gov>

Subject: RE: ACTION: Waterford 3 - Request for One-Time Exemption from 10 CFR 50, Appendix E Biennial EP Exercise

EXTERNAL SENDER. DO NOT click links, or open attachments, if sender is unknown, or the message seems suspicious in any way. DO NOT provide your user ID or password.

For clarification, an email transmission is adequate to satisfy this action.

Thanks,
Jason

From: Drake, Jason

Sent: Monday, December 13, 2021 12:20 PM

To: Mackaman, Clyde D <cmackam@entergy.com>; HARRIS, ALAN J <aharris@entergy.com>; Lewis, John <jlewis8@entergy.com>; Gaston, Ronald William <rgasto1@entergy.com>; Couture III, Philip <pcoutur@entergy.com>; Mahan, Cecil <cmahan@entergy.com>

Cc: Dixon-Herrity, Jennifer <Jennifer.Dixon-Herrity@nrc.gov>

Subject: ACTION: Waterford 3 - Request for One-Time Exemption from 10 CFR 50, Appendix E Biennial EP Exercise

Importance: High

Waterford,

This email is being transmitted with respect to submitted letter W3F1-2021-0063 from Entergy Operations, Inc. (the licensee) dated October 12, 2021 (Agencywide Documents Access and

Management System (ADAMS) Accession No. ML21285A290), requesting a one-time exemption from specific requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix E, Sections IV.F.2.b and IV.F.2.c, "Emergency Planning and Preparedness for Production and Utilization Facilities," for Waterford Steam Electric Station, Unit 3 (Waterford 3). The U.S. Nuclear Regulatory Commission (NRC or the Commission) in its review of the one-time exemption has identified that additional justification is required by the licensee to support an exemption of the 10 CR 50, Appendix E, Section IV.F.2.b onsite exercise rescheduling.

Example text from V.C. Summer exemption (ML093240159) is being provided for your review and use in development of a justification supplement:

"The licensee states that it has ***made a good faith effort to comply with the regulation*** in that the biennial exercise was previously scheduled to be performed on DATE. The licensee ***further states***, "However, a plant trip occurred on DATE due to failure of the main generator output breaker. The plant trip required redirection of station resources to respond to the forced outage and to perform recovery activities. Since the recovery efforts were a major distraction, the decision was made to postpone the exercise."

The NRC has provided this as an example for the licensee to modify as needed to reflect the specifics from the impacts due to the hurricane. Additionally, the licensee should consider incorporating a statement that ***a reasonable effort to reschedule the onsite portion of the exercise during CY 2021 was made, but was unsuccessful...***

With consideration to the timing needed for this exemption, the NRC emphasizes the urgency in receiving adequate justification as expeditiously as possible.

Prior to sending this email, timing and actions were discussed with the licensee via teleconference on the morning of December 13, 2021.

Regards,

Jason Drake
Project Manager
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
Phone: (301) 415-8378

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From: Lewis, John

Created By: jlewis8@entergy.com

Recipients:
"Drake, Jason" <Jason.Drake@nrc.gov>
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MESSAGE	6765	12/14/2021 1:55:25 PM

Options
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Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date: