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PNP 2012-034

May 11, 2012

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Entergy Nuclear Operations, Inc. 60-Day Response to the March 12, 2012, Information Request, Action Plan for Completing Emergency Communication and Staffing Assessments

Palisades Nuclear Plant
Docket 50-255
License No. DPR-20

Reference: NRC letter to Entergy, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 12, 2012 (ADAMS Accession Number ML12056A046)

Dear Sir or Madam:

On March 12, 2012, the NRC issued a letter (Reference 1) entitled, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*. Enclosure 5 of the letter contains specific requested actions and requested information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs. In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests within 90 days.

The letter states that if an addressee cannot meet the requested response date, then the addressee must provide a response within 60 days of the date of the letter and describe the alternative course of action that it proposes to take, including the basis of the acceptability of the proposed alternative course of action and estimated completion date. After a careful review of the requested actions and information, Entergy Nuclear Operations, Inc. proposes to take the alternative course of action described in Attachment 1 of this letter. The basis for the alternate proposal is provided in Attachment 2.

The new commitments contained in this submittal are summarized in Attachment 3.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 11, 2012.

Sincerely,


ajv/jse

- Attachments: 1. Proposed Alternative Course of Action for Responding to Recommendation 9.3 Information Request
2. Basis for Proposed Alternative Course of Action for Responding to Emergency Preparedness Requested Information
3. List of Regulatory Commitments

cc: Director of Office of Nuclear Regulation
Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC

Attachment 1 to

PNP 2012-034

**Proposed Alternative Course of Action for
Responding to Recommendation 9.3 Information Request**

Proposed Alternative Course of Action for
Responding to Recommendation 9.3 Information Request

Communications

Request #	Estimated Completion Date	Requested Information
1	10/31/12	<p>Provide an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a large scale natural event meeting the conditions described in the Discussion section of Enclosure 5 to the 10 CFR 50.54(f) letter. The assessment should:</p> <ul style="list-style-type: none"> • Identify any planned or potential improvements to existing onsite communications systems and their required normal and/or backup power supplies, • Identify any planned or potential improvements to existing offsite communications systems and their required normal and/or backup power supplies, • Provide a description of any new communications system(s) or technologies that will be deployed based upon the assumed conditions described above, and • Provide a description of how the new and/or improved systems and power supplies will be able to provide for communications during a loss of all alternating current (AC) power.
2	6/11/12	Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.
3	See dates below	Provide an implementation schedule of the time needed to conduct and implement the results of the communications assessment.
	9/28/12	Conduct the communications assessment.
	10/31/12	Provide an implementation schedule of the time needed to implement the results of the communications assessment.

Staffing

A two-phase approach is proposed to respond to the information requests associated with Staffing. The table below summarizes this approach.

Request #	Estimated Completion Date	Requested Information
1	See date below 12/19/14	<p>Provide an assessment of the onsite and augmented staff needed to respond to a large scale natural event meeting the conditions described in the Discussion section of Enclosure 5 to the 10 CFR 50.54(f) letter. This assessment should include a discussion of the onsite and augmented staff available to implement the strategies as discussed in the emergency plan and/or described in plant operating procedures. The following functions are requested to be assessed:</p> <ul style="list-style-type: none"> • How onsite staff will move back-up equipment (e.g., pumps, generators) from alternate onsite storage facilities to repair locations at each reactor as described in the order regarding the Near-Term Task Force (NTTF) Recommendation 4.2. It is requested that consideration be given to the major functional areas of NUREG-0654, Table B-1 such as plant operations and assessment of operational aspects, emergency direction and control, notification/communication, radiological accident assessment, and support of operational accident assessment, as appropriate. • New staff or functions identified as a result of the assessment. • Collateral duties (personnel not being prevented from timely performance of their assigned functions). <p>Provide onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2 (Phase 2 staffing assessment).</p>
2	See dates below	<p>Provide an implementation schedule of the time needed to conduct the onsite and augmented staffing assessment. If any modifications are determined to be appropriate, please include in the schedule the time to implement the changes.</p> <ol style="list-style-type: none"> 1. Conduct the onsite and augmented staffing assessment:

Request #	Estimated Completion Date	Requested Information
2 (con't)	11/19/14	The onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2 (Phase 2 staffing assessment)
	12/19/14	2. A schedule of the time needed to implement changes will be provided as follows: Those associated with the Phase 2 staffing assessment
3	6/11/12	Identify how the augmented staff would be notified given degraded communications capabilities.
4	6/11/12	Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.
5	6/11/12	Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.
6	See date below	Identify changes that have been made or will be made to your emergency plan regarding the on-shift or augmented staffing changes necessary to respond to a loss of all AC power, multi-unit event, including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.).
	12/19/14	Changes will be identified as follows: Those associated with the Phase 2 staffing assessment

Attachment 2 to

PNP 2012-034

**Basis for Proposed Alternative Course of Action for
Responding to Emergency Preparedness Requested Information**

**Basis for Proposed Alternative Course of Action for
Responding to Emergency Preparedness Requested Information**

Communications

There are two separate responses to the information requests related to communications. The alternative timing of responses to requests #1 and #3 proposed in this letter reflects the higher priority placed by the Staff, and approved by the Commission in Staff Requirements Memorandum (SRM)-SECY-12-0025, upon the completion of licensee actions necessary to comply with the Final Emergency Preparedness (EP) Rule issued on November 23, 2011 (76 Federal Register 72560). The proposed alternative timing is warranted because many of the licensee staff resources necessary for performing the communications assessment are the same resources involved in implementing new EP Rule requirements, responding to Institute of Nuclear Power Operations (INPO) initiatives related to enhancing communications capabilities (e.g., INPO Event Report 11-4), and maintaining existing EP communications equipment.

In addition, the estimated completion date assigned to information request #3 promotes alignment between the out-year budgeting/funding of future enhancements and the development of an accurate and complete enhancement implementation schedule.

Staffing

As presented in Attachment 1 of this letter, a two-phase approach is proposed to respond to the information requests associated with Staffing. The table below summarizes this approach.

Plant Type	Phase 1 Staffing Assessment (for functions except those related to Near-Term Task Force (NTTF) Recommendation 4.2)	Phase 2 Staffing Assessment (for functions related to NTTF Recommendation 4.2)
Single-unit plants	Perform staffing assessment and implement actions as required by recent EP Rule using Interim Staff Guidance (ISG) and Nuclear Energy Institute (NEI) 10-05	Perform staffing assessment as requested by the 10 CFR 50.54(f) letter using NEI 12-01; provide results per Attachment 1 of this letter

The basis for this approach is discussed below.

- Single-unit plants do not need to provide a Phase 1 staffing assessment in response to the 10 CFR 50.54(f) letter as performance of this activity is governed by the recent EP Rule and existing license requirements.
- The Phase 2 staffing assessment will be performed by November 19, 2014, and provided by December 19, 2014. This assessment will consider the requested functions related to Fukushima NTTF Recommendation 4.2.

The industry will be responding to multiple regulatory actions resulting from the recommendations contained in the Fukushima NTTF Report, as modified in related Commission Papers (SECYs) and SRMs. One of these actions, in particular, has the potential to impact emergency response staffing levels. This action is associated with Fukushima NTTF Recommendation 4.2 and subsequently issued as NRC Order to Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events EA-12-049 (the Order). A summary of the Order is provided below.

This Order requires a three-phase approach for mitigating beyond-design-basis external events. The initial phase requires the use of installed equipment and resources to maintain or restore core cooling, containment and spent fuel pool cooling. The transition phase requires providing sufficient, portable, onsite equipment and consumables to maintain or restore these functions until they can be accomplished with resources brought from off site. The final phase requires obtaining sufficient offsite resources to sustain those functions indefinitely.

Additional details on an acceptable approach for complying with this Order are expected to be contained in the final ISG scheduled to be issued by the NRC in August 2012.

In response to the Order, each licensee must develop new strategies for mitigating beyond-design-basis external events. To ensure accurate results, the staffing assessment for response functions related to NTTF Recommendation 4.2 must be based on the actions delineated in procedures and guidelines developed in response to the Order. Once the site-specific actions associated with the new response strategies are defined (e.g., down to the procedure or guideline step level), the staffing needed to perform these actions can be assessed with the necessary level of accuracy.

Based on a review of the planned actions necessary to comply with the Order, an assessment of the staffing for functions related to NTTF Recommendation 4.2 will be provided by December 19, 2014.

As requested, an implementation schedule for any modifications that are determined to be appropriate will be included with the Phase 2 staffing assessment.

The Phase 2 staffing assessment is one component of the overall work plan necessary to implement the requirements of the Order. Entergy, as stated in the Order, "...shall complete full implementation no later than two refueling cycles after submittal of the overall integrated plan, as required in Condition C.1.a, or December 31, 2016, whichever comes first." "Full compliance shall include procedures, guidance, training, and acquisition, staging, or installing of equipment needed for the strategies."

Attachment 3 to
PNP 2012-034
List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy Nuclear Operations, Inc. in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
Provide an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a large scale natural event.	X*		October 31, 2012
Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.	X*		June 11, 2012
Conduct the communications assessment.	X		September 28, 2012
Provide an implementation schedule of the time needed to implement the results of the communications assessment.	X*		October 31, 2012
Provide onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2.	X*		December 19, 2014
Conduct the onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2.	X		November 19, 2014
Provide a schedule of the time needed to implement changes associated with the Phase 2 staffing assessment.	X*		December 19, 2014

Identify how the augmented staff would be notified given degraded communications capabilities.	X*		June 11, 2012
Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.	X*		June 11, 2012
Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.	X*		June 11, 2012
Identify changes that have been made or will be made to the emergency plan regarding the on-shift or augmented staffing changes associated with the Phase 2 staffing assessment.	X*		December 19, 2014

* NRC submittal