NRR-PMDAPEm Resource

From: Chawla, Mahesh
Sent: Tuesday, July 28, 2015 4:54 PM
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Cc: Pelton, David; Beltz, Terry; Norris, Michael; Anderson, Joseph; Hoffman, Raymond; Oliver, David; Barclay, Kevin; Cameron, Jamnes; Rutkowski, John
Subject: LIC-109 Acceptance Review for Point Beach Nuclear Plant Units 1 and 2 - License Amendment Request 277, Rev to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan - MF6352/MF6353
Attachments: Acceptance Review_PBNP LAR - ERO StaffingAugmentation.docx

By letter dated June 12, 2015 (ADAMS Accession No. ML15166A042), NextEra Energy Point Beach, LLC (NextEra, the licensee) submitted a license amendment request for Point Beach Nuclear Plant (PNBP), Units 1 and 2. The proposed amendment would revise the PNBP Emergency Plan, to increase the staff augmentation times for Emergency Response Organization (ERO) response functions.

The purpose of this letter is to provide you the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this 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 (including the technical specifications) must fully describe the changes requested, and following 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 insufficient information was provides as part of the submittal package to support acceptance of this LAR for NRC staff's technical review at this time. In addition, the staff identified a number of requests for information required, based on a limited review of the submittal package. The information delineated in the enclosure to this letter is necessary to enable the NRC staff to make an independent assessment regarding the acceptability of the proposed amendment request in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that the licensee supplement the application to address the information requested in the enclosure within 13 working days from the date of a teleconference with the NRC staff. If the information responsive to the NRC staff's request is not received by a mutually agreed upon date during the teleconference, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC staff will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence. Please arrange a teleconference with the NRC staff (on cc) to discuss the staff comments.

If you have any questions, please feel free to contact me. Thanks

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Subject: LIC-109 Acceptance Review for Point Beach Nuclear Plant Units 1 and 2 - License Amendment Request 277, Rev to Staff Augmentation Times in the Point Beach Nuclear Plant Emergency Plan - MF6352/MF6353
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Files	**Size**	**Date & Time**	
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Acceptance Review_PBNP LAR - ERO StaffingAugmentation.docx			37307

Options
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NSIR/DPR Acceptance Review of Proposed ERO Staffing/Augmentation for Point Beach Nuclear Plant

NSIR/DPR has completed the acceptance review for the license amendment request (227) for Point Beach Nuclear Plant (PBNP) requesting NRC approval of changes to their emergency response organization (ERO) augmentation times. Based on this review, NSIR/DPR has determined that insufficient information exists as part of submittal package to support the staff's technical review. Specific examples include:

1. No evaluation was provided regarding whether delay in the staffing of the Emergency Operations Facility (EOF), from 60 to 90 minutes, will affect State and local emergency plans, including discussions with State and local response organizations on potential impacts.*[NOTE: Any change to the licensee's emergency plan that impacts or has the potential to impact State and local response actions will be provided to FEMA for review to verify that continued reasonable assurance that State and local emergency plans can be implemented. As such, an adequate evaluation, and documentation of coordination with offsite response organization (if applicable), needs to be provided as part of submittal.]*

2. No evaluation was provided regarding how the delay in activation time for the EOF from 60 to 90 minutes impacts the Technical Support Center (TSC) as it has to perform the EOF functions until the EOF is activated.

3. No evaluation was provided regarding how proposed changes to ERO augmentation times/staffing affect, or may affect, the timely activation/staffing and operation of the Joint Information Center (JIC).

4. The Nuclear Energy Institute (NEI) document NEI 10-05 has been endorsed by the NRC staff as a possible method for meeting the requirements of 10 CFR Part 50, Appendix E.IV.A.9 for on-shift staffing. The analysis in the NEI 10-05 is intended to determine if the on-shift staff has any competing priorities that may affect the performance of their ERO function. The analysis in NEI 10-05 was not developed for, and does not evaluate, the extension in timing of ERO augmentation. The analysis could be used to identify any on-shift personnel that would be available to potentially perform the function that the augmenting responder would be performing.

   Applicable portions of Enclosure 3 (staffing analysis), while referenced in submittal, is not included as described in Section 3.1 of Enclosure 1 to support specific changes being requested in ERO augmentation times/staffing.

5. The application states that the last PBNP Emergency Plan revision approved by the NRC was Revision 20 (NRC Safety Evaluation Report (SER) dated June 10, 1983, ADAMS Legacy No. 8306130431). However, the SER in fact only approved the provisions for on-shift staffing and augmentation at PBNP.

In addition, during the staff's acceptance review, the following areas that would likely require requests for additional information (RAIs) were tentatively identified. *[NOTE: The staff's initial review for acceptance was limited to Sections 3.1 through 3.2.4 and, therefore, serves only as an indicator of additional RAIs that may be required to support the staff's full technical review.]*

1. Comparison table in Enclosure 2 has a note that states:

   > The PBNP Emergency Plan Revision 20 commitment stated, "If appropriate, the TSC [Technical Support Center] will be activated in approximately 30 minutes and befully operational within one hour." The Plan did not specifically identify 30 minute and 60 minute responders.

   The information in Revision 20 of the PBNP Emergency Plan (ADAMS Legacy Accession No. 8312080061B) appears to identify specific responders in each facility for each emergency classification (Figures 5-3, 5-4, 5-5 and 5-6) and provides activation times (Section 3.2.2, 3.2.3 and 3.2.4) for these facilities. What is the basis for the augmentation staffing in the current revision to the PBNP Emergency Plan?

2. Due to the extent of ERO staffing and augmentation time changes proposed, have the drills or other means been performed to validate whether proposed emergency plan can be effectively implemented?

3. Section 3.2.2 (Emergency Control and Direction) of Enclosure 1 states:

   > The goal is to accomplishaugmentation of the TSC Manager, Rad/Chem *[Radiological/Chemistry]*Coordinator, I&C Leader,Mechanical/Electrical Leader, Chemist, and Dose/PAR*[Protective Action Recommendation]* Coordinator within30 minutes with additional ERO personnel in place such that activation ofthe TSC and EOF occur within 1 hour.

   If further states:

   > As described earlier, the advancesin technology, training and procedures as well as the additional on-shiftOperations personnel adequately compensate for any additional burdenimposed on the Shift Manager by the retention of the ED*[Emergency Director]*function for anadditional 30 minutes.

   Please provide addition detail to justify specifically how advances in technology, training and procedures compensate for any additional burden imposed on the Shift Manager due to the delay in augmentation for each of these six positions for the additional 30 minutes.

4. Section 3.2.4.1(Emergency Operations Facility Director) of Enclosure 1 states:

> The proposed change presents no adverse impact to the TSCstaffing when compared to Revision 20 or the current revision ofthe PBNP Emergency Plan, because the ED still provides timelyrelief to the on-shift ED from the duties and responsibilities foroffsite functions.

There is no specific evaluation in this section that supports this conclusion. Please provide an evaluation that supports the delay in relieving the on-shift ED from the duties and responsibilities for offsite functions.

5. Section 3.2.4.2(Offsite Dose Assessment/Chemistry) of Enclosure 1 states:

> On-shift capability for performance of the dose assessmentfunction is currently assigned to an on-shift Operations SeniorReactor Operator (SRO).

PBNP Emergency Plan Implementing Procedures (EPIPs) 1.3.1 (Revision 8) and 1.3.2 (Revision 7), under RESPONSIBILITIES, state:

> The Shift Manager (SM), as the Emergency Director in the Control Room, is responsible for the radiological dose assessment and protective action recommendations prior to TSC/EOF activation and formal transfer of responsibilities to the Emergency director in the EOF. If available, the SM may assign this task to the Operating Supervisor(s) (from the unaffected unit) or the Shift Technical Advisor.

Has the impact on the performance of the dose assessment function during a dual unit event been considered?

6. Section 3.2.4.3(Offsite/Onsite Surveys, In-Plant surveys and RP *[Radiation Protection]*) of Enclosure 1 states:

> An emergency reentry process has been developed for use duringa declared emergency. Electronic personal dosimeters have theiremergency dose and dose rate alarms set manually.

What on-shift personnel would be available to set the dosimeters manually and how are these set points derived? Has this function been evaluated in on-shift staffing analysis for potential conflicting duties during the initial phase of an event?

7. Section 3.2.4.3 of Enclosure 1 further states:

> Also, in-plant teams are briefed regarding radiological conditionsprior to being dispatched. Thus, under emergency conditions,personnel responding to emergencies in a high radiation area willbe knowledgeable of dose rates in the area, and radiationprotection personnel may not be required to accompany all teamsinto the plant areas.

How are these radiological conditions assessed during the event, and how do personnel stay knowledgeable of potentially evolving radiological conditions due to accident conditions, since this would not be considered a pre-planned activity?

8. Section 3.2.4.3 of Enclosure 1 further states:

> Installed effluent radiationmonitors and in-plant radiation monitors would be able to detectany radioactive release quickly and accurately.

What would be the impact of the extension in ERO augmentation times for RP personnel during a radiological release via an unmonitored release pathway?

9. Section 3.2.4.3 of Enclosure 1 further states:

> Although off-site survey data is available after the emergencyresponse facilities are activated, monitoring of installed plantradiological instrumentation is sufficient for the first 90 minutes ofan accident.

Please provide the technical basis justifying this statement?

10. Section 3.2.4.3 of Enclosure 1 further states:

> With improved installed instrumentation, dose calculation model,PPCS computer modeling, and the increase of on-shift staffing,<u>there is no more than minimal impact to the performance of these tasks</u> as a result of the proposed changes to augmentation times.*[underline added]*

Based on the above statement (see underline), the licensee has determined that there is an impact to the performance of these tasks. Please describe what the impact is to the performance of these tasks due to the delay in augmentation?