



August 14, 2015

NG-15-0260
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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Duane Arnold Energy Center
Docket No. 50-331
Renewed Op. License No. DPR-49

NextEra Energy Duane Arnold Energy Center, LLC's Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

- References: 1) Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (ML12056A045)
2) Letter, R. Anderson (NextEra Energy Duane Arnold, LLC) to U. S. NRC, "NextEra Energy Duane Arnold, LLC's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," NG-13-0084, dated February 28, 2013 (ML13063A148)

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Reference 1, an immediately effective Order to all licensees including NextEra Energy Duane Arnold, LLC (hereafter NextEra Energy Duane Arnold). In Reference 2, NextEra Energy Duane Arnold submitted an Overall Integrated Plan for the implementation of this Order. The Order required Licensee's to provide periodic status reports for the Overall Integrated Plan.

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The purpose of this letter is to provide the next six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The enclosure to this letter provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on August 14, 2015.



T. A. Vehec
Vice President, Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC

Enclosure

cc: Regional Administrator, USNRC, Region III
Resident Inspector, USNRC, Duane Arnold Energy Center
Project Manager, USNRC, Duane Arnold Energy Center

Attachment to NG-15-0260

NextEra Energy Duane Arnold, LLC's Six Month Status Report for the
Implementation of Order EA-12-049, Order Modifying Licenses with Regard to
Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

8 pages follow

NextEra Energy Duane Arnold, LLC's Six Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

1. Introduction

NextEra Energy Duane Arnold, LLC (hereafter, NextEra Energy Duane Arnold) developed an Overall Integrated Plan (Reference 2), documenting the diverse and flexible strategies (FLEX), in response to Reference 1. This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2. Milestone Accomplishments

The following milestone(s) have been completed since the submittal of the last six month update (Reference 7), and are current as of July 31, 2015.

- Submit 6 month status report
- FLEX Storage Buildings Completed

3. Milestone Schedule Status

The following provides an update to Attachment 4 of the Overall Integrated Plan (Reference 2) as modified by Reference 3. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

The revised milestone target completion dates do not impact the order implementation date.

| Milestone | Target Completion Date | Activity Status | Revised Target Completion Date |
|---|-------------------------------|------------------------|---------------------------------------|
| Submit Overall Integrated Implementation Plan | February 2013 | Completed | N/A |
| Submit 6 Month Status Report | August 2013 | Completed | N/A |
| Complete Revision to Emergency Operating Procedures to Extend Operation of Steam Driven Pumps | December 2013 | Completed January 2014 | N/A |
| Submit 6 Month Status Report | February 2014 | Completed | N/A |
| Complete Regional Response Center Arrangements | December 2015 | Started | N/A |
| Submit 6 Month Status Report | August 2014 | Completed | N/A |
| First Refueling Outage of Implementation Period | RFO 24 (Fall 2014) | Completed | N/A |

| Milestone | Target Completion Date | Activity Status | Revised Target Completion Date |
|---|-------------------------------|------------------------|---|
| Complete Site Specific Analysis of NEDC-33771P Rev. 1 | January 2015 | Completed | N/A |
| Submit 6 Month Status Report | February 2015 | Completed | N/A |
| FLEX Storage Buildings Completed | March 2015 | Completed | N/A |
| Identified Portable Equipment Stored on Site | May 2015 | Started | Dec. 2015 Primary portable equipment is on site, procurement of remaining equipment is underway. |
| Submit 6 Month Status Report | August 2015 | Completed | N/A |
| Issue Modification Packages | December 2015 | Started | N/A |
| Submit 6 Month Status Report | February 2016 | Not Started | N/A |
| Complete Staffing Study for Flex Implementation | May 2016 | Not Started | N/A |
| Validate that time sensitive actions can be completed consistent with the Flex Strategies | August 2016 | Not Started | N/A |
| Complete Implementing Procedure Development and Validation | August 2016 | Started | N/A |
| Submit 6 Month Status Report | August 2016 | Not Started | N/A |
| Complete Required Training | September 2016 | Started | N/A |
| Final Implementation Outage for Modifications | RFO 25 (Fall 2016) | Not Started | N/A |
| Submit Completion Report | December 2016 | Not Started | N/A |

4. Changes to Compliance Method

In addition to changes in compliance methods described in the previous six month update (Reference 7), the following new change to the compliance strategy was identified during this period:

In the original DAEC Overall Integrated Plan (OIP) (Reference 2) for implementation of NRC Order EA-12-049, a new suction line was planned for installation as buried piping between the circulating water pit in the pump house and the turbine building to allow staging of a portable pump inside the flood protected area of the turbine building (OIP Action 19) while still drawing water from the circulating water pit. In preparing the detailed design and construction planning for this modification, it was identified that underground interferences would make routing of this pipe difficult. An alternative source of high quality water that would be available, and as effective, during a flood is the Main Turbine Condenser System hot well. Duane Arnold Energy Center is

modifying its OIP to use a connection point for suction from the hot well rather than installing buried piping between the pump house and the turbine building.

The DAEC OIP describes the strategy for Phase 2 to maintain core cooling using portable equipment. Under the modification section of this description it states: *A buried 8" suction pipe will be routed from Pump House to the south wall of the rollup door in Turbine Building (Attachment 7)(Action 19).* This section is revised to reflect that a buried suction pipe will not be installed.

Attachment 7 of the DAEC OIP provides a sketch of the injection path to the reactor pressure vessel that includes a reference to an 8 inch buried pipe. This sketch is revised to delete the reference to buried piping and reflect use of the hotwell as a water source. Attachment 12 of the DAEC OIP provides a list of implementation action items of which, Action 19 describes the modification as: *The portable pump suction will allow access to the circulating water pit (Pump House) from a protected area (Turbine Building) during design bases flood.* The modification description is revised to eliminate reliance on this suction path and instead establish a hot well connection point. For scenarios other than external flood, the pump house circulating water pit will remain available as a source of water for reactor vessel injection. Underground piping is not needed for these scenarios since the yard remains suitable for laying of temporary flexible hose between the pump house and reactor building.

5. Need for Relief/Relaxation and Basis for the Relief/Relaxation

NextEra Energy Duane Arnold expects to comply with the order implementation date and no relief/relaxation is required at this time.

6. Open Items from Overall Integrated Plan and Interim Staff Evaluation

The following tables provide a summary of the open items documented in the Overall Integrated Plan or the Interim Staff Evaluation (SE) and the status of each item.

| | Overall Integrated Plan Pending Actions | Status |
|---|--|---|
| 1 | Seismic re-evaluations pursuant to the 10 CFR 50.54(f) letter of March 12, 2012 are not completed and therefore not assumed in this submittal. As the re-evaluations are completed, appropriate issues will be entered into the corrective action process and addressed. | Completed. Reference 5 submitted the seismic re-evaluation to the NRC. No issues impacting the implementation of Order EA-12-049 were identified. |
| 2 | Flood re-evaluations pursuant to the 10 CFR 50.54(f) letter of March 12, 2012 are not completed and therefore not assumed in this submittal. As the re-evaluations are completed, appropriate issues will be entered into the corrective action process and addressed. | Completed. Reference 6 submitted the Flood re-evaluation to the NRC. No issues impacting the implementation of Order EA-12-049 were identified. |
| 3 | Implement revisions to emergency operating procedures (EOPs) identified by the BWROG to extend operation of steam driven pumps for core cooling during ELAP. | Completed |

| | Overall Integrated Plan Pending Actions | Status |
|----|---|--|
| 4 | Validate implementing procedures can be performed in a timely manner. | Not Started |
| 5 | Final plant specific analysis for an ELAP will be performed with equivalent acceptance criteria with the exception of Condensate Storage Tank (CST) inventory and suppression pool level which will be altered in recognition of the external hazards and revised duration of the mitigating strategies. | Completed |
| 6 | Phase 3 activities will ensure adequate inventory of water can be provided directly from the Cedar River or other sources independent of the normal River Water Supply pumps. | Started |
| 7 | Implement new and revised plant procedures for FLEX Strategies. | Started |
| 8 | Implement administrative controls for the FLEX Program. | Started |
| 9 | Procure FLEX portable equipment. | Started |
| 10 | Establish preventive maintenance and testing of FLEX portable equipment. | Started |
| 11 | Revise UFSAR and TRM as needed to reflect FLEX program. | Not started |
| 12 | Complete training of applicable personnel. | Started |
| 13 | Establish "Playbook" for Regional Response Center interface with the NextEra Energy Duane Arnold. | Started |
| 14 | Review generic BWROG analysis of FLEX implementation and perform a detailed review of suppression pool temperature to support FLEX strategies. | Completed |
| 15 | Perform analysis of final load shedding strategy for essential station batteries and implement in plant procedures. | Completed |
| 16 | Modify the plant to establish a flood staging area for portable equipment. | Started |
| 17 | Evaluate deployment routes for portable equipment. | Not started |
| 18 | Modify the plant to facilitate connection of portable power supplies. This will include connection points for a 480 volt generator to essential battery chargers and 480 volt distribution panel 1B03. Quick connection points will be established for 120 volt AC power to Instrument power supplies. | Started. Detail design has concluded the preferred connection point is at 1B032. |
| 19 | Modify the plant to add suction and injection connection points for portable pump. The portable pump suction will allow access to the circulating water pit (Pump House) from a protected area (Turbine Building) during a design bases flood. The injection point will provide a redundant connection point for RPV makeup located in a protected area (Reactor Building). | Started. The proposed modification is revised to allow access to the Main Turbine Condenser System hot well rather than the circulating water pit during a design bases flood. |

| | Overall Integrated Plan Pending Actions | Status |
|----|---|---|
| 20 | Construct two FLEX portable equipment storage buildings. The buildings will be separated to minimize the potential for a single tornado path to interact with both buildings. | Completed |
| 21 | Phase 3 activities will ensure essential bus can be re-powered using a portable 4160 V Generator. This will include a modification that establishes a transfer panel (disconnect switch) installed in the turbine building that provides a location for connection during a design bases flood and procedures for mobilization. | Started. Detail design has concluded a temporary connection into an existing breaker to allow ready connection of the portable generator to station 4160 Volt distribution provides a more flexible option. |
| 22 | Procedures will provide for opening containment vent valves using portable pneumatic supply. | Procedures currently exist but will be reviewed in association with modification development under Order EA-13-109. |
| 23 | Modify the plant to establish a manual vent capability for the reactor building near the spent fuel pool. | Started |
| 24 | Update analysis of room heat-up during an ELAP. | Not started |
| 25 | Screen BWROG RCIC Durability Study for extending RCIC operation during an ELAP and make applicable improvements. | Started |
| 26 | Establish methods to recharge communications equipment. | Completed |
| 27 | Establish methods to re-fuel portable equipment. | Started |
| 28 | Review generic BWROG analysis of FLEX implementation and perform a detailed review of limitations on SRV operation to support FLEX strategies. | Completed |
| 29 | If FLEX transport paths are over previously un-excavated ground, review path for potential soil liquefaction during a seismic event. | Completed. |

| Item Number | Interim Staff Evaluation Open and Confirmatory Items | Status |
|--------------------|---|---------------|
| 3.1.1.4.A | Off-Site Resources – Confirm the location of the local staging area for the RRC equipment, and that access routes to the site, the method of transportation, and the drop off area have been properly evaluated for all applicable hazards. | Started |

| Item Number | Interim Staff Evaluation Open and Confirmatory Items | Status |
|-------------|--|---|
| 3.1.2.A | Confirm the actual flood hazard level for which reasonable protection and a means to deploy the portable equipment is to be provided. | Completed. Reference 6 submitted the Flood re-evaluation to the NRC. No issues impacting the implementation of Order EA-12-049 were identified. |
| 3.1.3.1.A | Confirm that the separation of the two FLEX equipment storage buildings is sufficient to reasonably ensure that one set of equipment will be available, accounting for local tornado data (speed and direction), the actual separation distance of the buildings, and the axis between them. | Completed |
| 3.2.1.1.A | From the June 2013, position paper (ADAMS Accession No. ML 13190A201), as discussed in the NRC endorsement letter dated October 3, 2013 (ADAMS Accession No. ML 13275A318), confirm that benchmarks are identified and discussed which demonstrate that the Modular Accident Analysis Program (MAAP) 4 is an appropriate code for the simulation of an ELAP event at Duane Arnold. | Completed |
| 3.2.1.1.B | Confirm that the collapsed vessel level in the MAAP4 analysis remains above Top of Active Fuel (TAF) and the cool down rate is within technical specification limits. | Completed |
| 3.2.1.1.C | Confirm that MAAP4 is used in accordance with Sections 4.1, 4.2, 4.3, 4.4, and 4.5 of the June 2013, position paper. | Completed |
| 3.2.1.1.D | Confirm that in using MAAP4, the subset of key modeling parameters cited from Tables 4-1 through 4-6 of the "MAAP4 Application Guidance, Desktop Reference for Using MAAP4 Software, Revision 2" (Electric Power Research Institute Report 1 020236) is justified. This should include response at a plant-specific level regarding specific modeling options and parameter choices for key models that would be expected to substantially affect the ELAP analysis performed for that licensee's plant. Parameters considered important in the simulation of the ELAP event by the vendor/licensee include nodalization, general two-phase flow modeling, modeling of heat transfer and losses, choked flow, vent line pressure losses, and decay heat. | Completed |
| 3.2.1.1.E | Confirm that the specific MAAP4 analysis case that was used to validate the timing of the mitigating strategies in the Integrated Plan is identified. Alternately, a comparable level of information may be included in the supplemental response. | Completed |

| Item Number | Interim Staff Evaluation Open and Confirmatory Items | Status |
|-------------|---|-------------|
| 3.2.1.3.A | The licensee plans to revise its procedures to be consistent with the BWROG recommendations for extending the availability of steam-driven core cooling systems. Confirm that the technical justification for the recommendations is applicable to DAEC. | Started |
| 3.2.1.8.A | Confirm that the two portable diesel-driven pumps sized in accordance with 10 CFR 50.54(hh)(2) requirements will have sufficient capability to be used as credited in the FLEX strategies implemented pursuant to Order EA-12-049. | Started |
| 3.2.3.A | Confirm that the DAEC implementation of BWROG EPG/ SAG, Revision 3, including any associated plant-specific evaluations, is completed in accordance with the provisions of the NRC endorsement letter dated January 9, 2014. | Started |
| 3.2.4.2.A | Confirm that the updated analyses of room heat-up (and any supporting actions) ensure that adequate cooling is provided to equipment needed during an ELAP event. | Not Started |
| 3.2.4.2.B | Confirm that any equipment in the reactor building needed for ELAP mitigation during Phases 2 or 3 will not be compromised by the steam environment caused by SFP boiling. | Not Started |
| 3.2.4.4.A | The NRC staff has reviewed the licensee communications assessment (ADAMS Accession No. ML12307A120) and has determined that the assessment and planned upgrades are reasonable (ADAMS Accession No. ML 13142A320). Confirm that the upgrades to the site's communications systems have been completed. | Completed |
| 3.2.4.6.A | Confirm that DAEC's plan addresses accessibility and habitability of all plant areas requiring personnel access in sufficient detail to determine if the environmental conditions support the needed operator actions. | Not Started |
| 3.2.4.7.A | Confirm that the potential effects of using river water, which may contain suspended solids, for reactor/SFP cooling are addressed. | Completed |
| 3.2.4.9.A | Confirm that a refueling strategy for FLEX equipment has been developed based on a plant-specific analysis. The confirmation should include delivery capabilities, including for an indefinite coping period, and how fuel quality will be assured, if stored for extended periods (including fuel contained in the fuel tanks of Phase 2 equipment). | Started |
| 3.2.4.10.A | Confirm that the final load shedding analysis has been completed and that the time constraints assumed in the mitigating strategies have been validated, based on the results of that analysis (DAEC Open Action Item 15). | Completed |
| 3.4.A | Offsite resources - Confirm that NEI 12-06, Section 12.2 guidelines 2 through 10, regarding minimum capabilities for offsite resources, have been adequately addressed. | Started |

7. Potential Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation identified at this time.

8. References

- 1) Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (ML12056A045)
- 2) Letter, R. Anderson (NextEra Energy Duane Arnold, LLC) to U. S. NRC, "NextEra Energy Duane Arnold, LLC's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," NG-13-0084, dated February 28, 2013 (ML13063A148)
- 3) Letter, T.A. Vehec (NextEra Energy Duane Arnold, LLC) to U. S. NRC, "NextEra Energy Duane Arnold Energy Center, LLC's Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)" NG-14-0200, dated August 25, 2014 (ML 14239A493)
- 4) NRC Order EA-13-109, "Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated June 6, 2013. (ML13143A321)
- 5) Letter, R. Anderson (NextEra Energy Duane Arnold, LLC) to U. S. NRC "NextEra Energy Duane Arnold, LLC Seismic Hazard and Screening Report (CEUS Sites), Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 2.1 of Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident" (NG-14-0092), dated March 28, 2014 (ML14092A331)
- 6) Letter, R. Anderson (NextEra Energy Duane Arnold, LLC) to U. S. NRC "Response to NRC Request for Information Pursuant to 10CFR 50.54(f) Regarding Recommendation 2.1, Flooding. Of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident; Flood Hazard Reevaluation Report" (NG-14-0076), dated March 10, 2014 (ML14072A019)
- 7) Letter, T. A. Vehec (NextEra Energy Duane Arnold, LLC) to U. S. NRC, "NextEra Energy Duane Arnold Energy Center, LLC's Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)" (NG-15-0032, dated February 19, 2015 (ML15054A006)