

NRR-PMDAPEm Resource

From: Huffman, William
Sent: Thursday, April 14, 2016 7:25 AM
To: Bill Drews (WDrews1@entergy.com); Chris Adner (CAdner@entergy.com)
Cc: Hawes, Mark; Huckabay, Victoria; Keefe, Molly; Weerakkody, Sunil; Lamb, John; Khanna, Meena; Grover, Ravinder
Subject: MF7280 - Draft RAI Re: the Proposed FitzPatrick Administrative Tech Spec Amendment for Staffing and Training Upon Permanent Reactor Shutdown

**DRAFT REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED CHANGES TO TECHNICAL SPECIFICATION
ADMINISTRATIVE CONTROLS FOR STAFFING AND TRAINING UPON
PERMANENT CESSATION OF OPERATION**

**JAMES A. FITZPATRICK NUCLEAR POWER PLANT
ENTERGY NUCLEAR OPERATIONS, INC
DOCKET NO. 50-333
RENEWED FACILITY OPERATING LICENSE NO. DPR-59**

By letter dated January 15, 2016 (ADAMS Accession Number ML16015A456; CAC MF7280), Entergy Nuclear Operations (ENO) submitted a License Amendment Request (LAR) for the James A. FitzPatrick Nuclear Power Plant (JAF) Technical Specifications (TS). On November 18, 2015, ENO provided a formal notification to the Nuclear Regulatory Commission (NRC) of its intention to permanently cease power operations of JAF at the end of the current operating cycle (ADAMS Accession Number ML15322A273). On March 16, 2016, ENO certified, pursuant to 10 CFR 50.82(a)(1)(i), that JAF would be permanently shut down on January 27, 2017 (ADAMS Accession Number ML16076A391). Once certifications for permanent cessation of operation and permanent removal of fuel from the reactor are submitted to the NRC, certain TS administrative controls may no longer be applicable. Therefore, ENO is requesting approval of changes to the staffing and training requirements in Section 5.0, Administrative Controls, of the JAF TSs that ENO considers appropriate for a permanently shutdown reactor and consistent with the defueled TSs of other decommissioning power reactors. The proposed amendment would not be effective until NRC receipt of the certification of permanent cessation of operation and certification of permanent removal of fuel from the reactor vessel for JAF and NRC approval of the ENO certified fuel handler training program for JAF.

The NRC staff has determined that additional information is needed to continue the review as discussed below.

This request for additional information (RAI) is identified as draft at this time to confirm your understanding of the RAIs and of the information needed to complete our evaluation. If the request for information is understood, please respond to this RAI within 30 days of the date of this request.

Please call me at 301-415-2046 if you would like to set up a conference call to clarify the request for information.

Respectfully,

Bill Huffman
Project Manager
NRR/DORL/LPL4-2
U.S. Nuclear Regulatory Commission
(301) 415-2046

RAI-1 The following questions apply to Attachment 1 to the License Amendment Request (LAR), Section 2, "Detailed Description and Basis for the Changes":

- a. In Technical Specification (TS) Section 5.1, Responsibility, the current Section 5.1.1 states, in part: "The plant manager shall be responsible for overall plant operation..." The proposed TS 5.1.1 states, in part: "The plant manager shall be responsible for overall facility operation..."

Provide additional information explaining the basis for the change in terminology from "plant" to "facility," as it appears in TS 5.1.1 and throughout TS Section 5.0, Administrative Controls, as described in the LAR. Further, clarify why the position title of "plant manager" remains unchanged, as it appears in TS 5.1.1 and TS 5.2.1, Onsite and Offsite Organizations.

- b. The current TS 5.2.1, Onsite and Offsite Organizations, states, in part: "Onsite and offsite organizations shall be established for plant operation and corporate management, respectively." The proposed TS 5.2.1 states, in part: "Onsite and offsite organizations shall be established for facility staff and corporate management, respectively." Further, the current TS 5.2.1.a states, in part: "These requirements, including the plant-specific titles of those personnel..." There are no changes proposed for TS 5.2.1.a.

Clarify why the reference to "plant-specific titles" in the proposed TS 5.2.1.a remains unchanged, whereas the first paragraph in the proposed TS 5.2.1 refers to "facility staff."

- c. The text of the current and proposed TS 5.1.2, as shown in Attachment 1, Section 2 (pages 1 and 2), does not match the current and proposed JAF TS, as shown in the markup of TS pages provided in Attachment 2 to the LAR.

Verify that the text of TS 5.1.2 provided in either Attachment 1 or 2 is correct as shown, or otherwise provide clarification regarding the apparent inconsistencies.

- d. The current TS 5.2.1.c states, in part: "The chief nuclear officer shall have corporate responsibility..." The basis for proposed changes to TS 5.2.1.c states, in part: "The assignment of this responsibility is changed from the JAF site vice president to a specified corporate officer."

Clarify the apparent discrepancy between the current TS 5.2.1.c, which makes a reference to the "chief nuclear officer" position, and the verbiage of the basis for the proposed change, which makes a reference to the "JAF site vice president."

- e. The proposed TS 5.2.1.c states, in part: "The corporate officer shall have overall responsibility..." The basis for proposed changes to TS 5.2.1.c states, in part: "The assignment of this responsibility is changed from the JAF site vice president to a specified corporate officer." It further states: "The revised specification is consistent with TS 5.2.1.c of NUREG-1433, "Standard Technical Specifications General Electric BWR/4 Plants," Revision 4 (Reference 3)." NUREG-1433, Volume 1, Revision 4 (ADAMS Accession Number ML12104A192), Section 5.2.1.c states, in part: "A specified corporate officer shall have corporate responsibility..."

Clarify the apparent inconsistency between the use of terminology "the corporate officer" in the proposed TS 5.2.1.c, and the terminology used in NUREG-1433, which refers to "a specified corporate officer."

- f. The proposed TS 5.2.2.a states, in part: "Each duty shift shall be composed of at least one shift supervisor and one Non-certified Operator." The proposed TS 5.2.2.f states: "At least one person qualified to stand watch in the control room (Non-certified Operator or Certified Fuel Handler) shall be present in the control room when nuclear fuel is stored in the spent fuel pool. Further, the basis for changes to TS 5.2.2.f states, in part: "The training and qualification for the

Non-certified Operator will be determined in accordance with the systems approach to training (SAT) as defined in 10 CFR 55.4.”

Provide additional information regarding the minimum qualifications for the Non-certified Operator position and identify the relevant program documents or procedures which establish such requirements. In your response, explain how the Non-certified Operator position qualification is covered by the proposed TS 5.3.1, which states, in part: “Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI [American National Standards Institute] /ANS [American Nuclear Society] 3.1-1978 for comparable positions with exceptions specified in the Quality Assurance Program Manual (QAPM).”

- g. The proposed TS 5.2.2.b states: “Shift crew composition may be less than the minimum requirements of 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition within the minimum requirements.” The basis for proposed changes to TS 5.2.2.b states, in part: “Additional provisions are added to ensure that the shift crew composition is not below the minimum requirements when fuel movements are in progress, movements of loads over fuel are in progress or shift turnover is in progress.”

Provide additional information regarding why additional provisions to ensure that the shift crew composition is not below the minimum requirements when fuel movements are in progress, movements of loads over fuel are in progress, or shift turnover is in progress, are not included in the proposed TS 5.2.2.b.

- h. The proposed TS 5.2.2.d states: “Oversight of fuel handling operations shall be provided by a Certified Fuel Handler.” The basis for proposed changes to TS 5.2.2.d states, in part: “Fuel moves and heavy load moves that could affect the safe handling and storage of nuclear fuel would be approved by the shift supervisor.”

Provide additional information regarding why direct supervision of fuel handling operations by a Certified Fuel Handler (instead of “oversight of fuel handling operations,” as stated in the proposed TS 5.2.2.d verbiage), is not required.

- i. The current TS 5.3.1 states: “Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Entergy Quality Assurance Program Manual (QAPM).” The proposed TS 5.3.1 states: “Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Quality Assurance Program Manual (QAPM).” The basis for proposed changes to TS 5.3.1 states: “This paragraph is being changed for consistency with other changes in this Amendment.”

Provide additional information regarding the proposed change that revises the title of the QAPM, by removing specific reference to the Entergy corporate QAPM. In your response, clarify if such change is intended to allow JAF to transition from the Entergy corporate QAPM to a site-specific QAPM during the decommissioning process. Further, provide additional information regarding any changes to the exceptions from the qualification standards in ANSI/ANS 3.1-1978 that are proposed in the site-specific QAPM.

RAI-2 The last paragraph of Attachment 1, Section 3.1, “Applicable Regulatory Requirement/Criteria states: “10 CFR 50.54(hh) establishes the requirements for developing, implementing, and maintaining procedures and strategies for addressing potential aircraft threats and large area fires or explosions. 10 CFR 50.54(hh)(3) states that this section of the regulation does not apply to nuclear power plants that have submitted the certifications required by 10 CFR 50.82(a).”

Provide additional information regarding the applicability of the abovementioned paragraph to the scope of changes proposed in this LAR.

RAI-3 In Attachment 1, Section 3.2, “No Significant Hazards Consideration Determination,” in the response to Question 3 states, in part: “The proposed changes are limited to those portions of the OL [Operating License] and TS that are not related to the safe storage of irradiated fuel. The requirements that are proposed to be revised or deleted from the JAF OL and TS are not credited in the existing accident analysis for the remaining applicable postulated accident; and as such, do not contribute to the margin of safety associated with the accident analysis.”

Provide additional information regarding what changes to the OL, other than the proposed revisions to TS 5.0, Administrative Controls, as described in Attachment 1, Section 2, “Detailed Description and Basis for the Changes,” are being referred to in the abovementioned paragraph.

RAI-4 The current TS 5.4, Procedures, states, in part: “5.4.1 Written procedures shall be established, implemented, and maintained covering the following activities: a. The applicable procedures recommended in Regulatory Guide 1.33, Appendix A, November 1972.” There are no changes proposed to TS 5.4 in this LAR.

Provide clarification regarding why a revision to TS 5.4.1 is not necessary, as it relates to permanent cessation of operations and permanent defueled condition of JAF. In your response, provide additional information regarding how TS 5.4.1.a addresses the requirements for the establishment, implementation, and maintenance of written procedures covering the following activities: (a) Normal startup, operation, and shutdown of systems and components needed for the safe storage of nuclear fuel; (b) Fuel handling operations; (c) Actions to be taken to correct specific and foreseen potential malfunctions of systems and components needed for the safe storage of nuclear fuel; and (d) Preventive and corrective maintenance operations which could have an effect on the safety of the nuclear fuel.

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