

## **NRR-PMDAPEm Resource**

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**From:** Huffman, William  
**Sent:** Tuesday, May 24, 2016 10:54 AM  
**To:** Bill Drews (WDrews1@entergy.com); Hawes, Mark  
**Cc:** Lamb, John; Koenick, Stephen; Norris, Michael; Hoffman, Raymond; Anderson, Joseph; Khanna, Meena  
**Subject:** MF7347 - Draft RAIs Regarding the Proposed James A. FitzPatrick NPP License Amendment Request to Revise its Emergency Plan for the Permanently Defueled Condition

Mr. William C. Drews  
Regulatory Assurance Manager  
Entergy Nuclear Operations, Inc.  
James A. Fitzpatrick Nuclear Power Plant

**REQUEST FOR ADDITIONAL INFORMATION**  
**REGARDING PROPOSED EMERGENCY PLAN CHANGE AMENDMENT**  
**FOR THE PERMANENTLY DEFUELED CONDITION**  
**ENTERGY NUCLEAR OPERATIONS. INC.**  
**JAMES A. FITZPATRICK NUCLEAR POWER PLANT**  
**DOCKET NO. 50-333**  
**RENEWED FACILITY OPERATING LICENSE NO. DPR-59**

By letter dated February 04, 2016 (ADAMS Package Accession Number ML16043A424; CAC MF7347), Entergy Nuclear Operations (ENO) submitted a License Amendment Request (LAR) to the Nuclear Regulatory Commission (NRC) for the James A. FitzPatrick Nuclear Power Plant (JAF) Emergency Plan for the permanently defueled condition. On March 16, 2016, ENO certified that, pursuant to 10 CFR 50.82(a)(1)(i), 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, reactor operation is no longer authorized and the spectrum of credible accidents at the facility will be reduced. The licensee states that certain on-shift positions and Emergency Response Organization (ERO) positions that are needed during normal reactor operation will no longer be longer necessary to protect the public health and safety from the risks of spent fuel storage and decommissioning activities. Therefore, the ENO request revises the JAF Emergency Plan to reduce certain on-shift staffing and ERO positions that the licensee states are unnecessary to effectively respond to credible accidents following permanent defueling. The proposed amendment would not be effective until the certification of permanent cessation of operation and certification of permanent removal of fuel from the reactor vessel are submitted to the NRC.

The NRC staff notes that formal offsite radiological emergency preparedness (REP) plans, approved by the Federal Emergency Management Agency (FEMA) in accordance with Title 44 of the Code of Federal Regulations (CFR) Part 350, are required to be maintained and in effect until such time as the NRC approves

an exemption to formal offsite emergency preparedness requirements. The changes proposed by ENO, specifically in regards to ERO staffing of the licensee's emergency operations facility and Joint Information Center have the potential to adversely impact the effective implementation of State and local REP plans.

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 RAI 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, otherwise, please schedule a clarification call as soon as reasonable possible.

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  
[William.Huffman@nrc.gov](mailto:William.Huffman@nrc.gov)

#### RAI-JAF-1

Attachment 1, Page 11 of 36, states:

The proposed changes to the JAF Emergency Plan, including the minimal changes made to the ERO to develop the post-shutdown ERO, have been evaluated for impacts on the ERO and for the ability of offsite response organizations to implement their Federal Emergency Management Agency (FEMA)-approved Radiological Emergency Preparedness (REP) Plans. Potential impacts on the ability of State and local response organizations to effectively implement their FEMA-approved REPs do not exist because no tasks that require interfacing with State and local response organizations are proposed for elimination. JAF has appropriately addressed elimination of ERO positions that interface with offsite representatives by transferring the necessary tasks to remaining post-shutdown ERO positions.

FEMA/NRC MOU [Memorandum of Understanding] establishes a "framework of cooperation" regarding the maintenance of REP programs to ensure continued reasonable assurance. Under the MOU, FEMA is responsible for determining the adequacy of offsite REP plans and preparedness and providing its findings to the NRC "to make radiological health and safety decisions in the issuance of licenses and the continued operation of licensed plants." The NRC will be providing the proposed changes to the facilities that have interface with the State and local response organizations to FEMA for their review

- a. Please provide documentation that affected State and local response organizations have performed a review of the proposed changes to the JAF emergency plan and concur with ENO's assessment that potential impacts do not exist.

#### RAI-JAF-2

Attachment 1, Page 11 of 36, states:

To validate the results of the analysis, drills will be developed and conducted prior to implementation of the changes described within. The drills will be conducted to confirm

the ability of the post-shutdown ERO to perform the necessary functions of each emergency response facility and will utilize the post-shutdown procedures that will be developed depicting the revised assignment of duties. The drills will be used to train and qualify post-shutdown ERO members, evaluate and validate the ability to accomplish the stated mission of each emergency response facility, and ensure that the planning standard functions are preserved with no degradation in time sensitive activities or in the ability to communicate with offsite response organizations. The drills will also validate that the post-shutdown ERO continues to address the risks to public health and safety and comply with the JAF Emergency Plan, site commitments, and applicable regulations.

- a. Please provide a proposed schedule of drills that will be conducted to confirm the ability of the post-shutdown ERO to perform the necessary functions of each emergency response facility using post-shutdown procedures as appropriate. Please be aware that the NRC staff, and possibly FEMA, will observe one or more of these drills.

#### RAI-JAF-3

Attachment 1 (on Page 15 of 36) states:

The elimination of the TSC Engineers... does not impact the capabilities of the on-shift staffing or augmented response. The TSC will continue to be activated at an Alert or higher declaration. Functional responsibilities of the positions eliminated as a result of the changes will be reassigned to remaining positions.

The proposed changes will remove the TSC reactor engineer, electrical engineer, I&C engineer, and the mechanical engineer. As proposed, the engineering coordinator will provide engineering support for all postulated accidents that will be applicable in the permanently defueled condition.

- a. Please explain how the engineering coordinator is qualified to perform the functions of the electrical, I&C, and mechanical engineers as needed to provide engineering support for the applicable postulated accidents.
- b. Please provide justification that the engineering coordinator can perform all required engineering support activities for the applicable postulated accidents.

#### RAI-JAF-4

Attachment 1, Section 3.2.3 (on Page 24 of 36) provides that three nuclear plant operator and three senior nuclear operator on-shift positions will be eliminated. The analysis for Section 3.2.3 specifically addresses assessment of operational aspects. No specific discussion addressing the potential impact of removing these on-shift positions for the Repair and Corrective Actions major functional area collateral duties of the electrical maintenance and radwaste operators was apparent.

- a. Please provide justification that the proposed changes will not impact the ability of normal operations on-shift personnel to perform limited emergency electrical maintenance work or provide justification for removing the on-shift electrical maintenance position.
- b. Please provide justification that the proposed changes will not impact the ability of normal operations on-shift personnel to perform the radwaste operator function or provide justification for removing the radwaste operator on-shift position.

#### RAI-JAF-5

Attachment 3, Figure 5-2, "J.A.F.N.P.P. Defueled Emergency Staffing On-Shift Response Organization," (on Page 5-19) implies that the Fire Brigade will be in addition to the On-Site Non-Certified Operator (NCO).

However, attachment 3, Table 5-1, "Plant Personnel – Emergency Activity Assignments," (on Pages 5-22, and 5-25) provides that three nuclear plant operator/non-certified operator and two plant fire brigade positions are available. Additionally, note 'H,' of Attachment 3, Table 5-1 (on Page 5-26) states, "[t]he JAFNPP complement is three Nuclear Plant Operators/Non-Certified Operators and two other qualified staff.

Please clarify whether the NCO identified on Figure 5-2 of Attachment 3 is in addition to the three NCOs on the fire brigade or revise accordingly.

#### RAI-JAF-6

Attachment 3, Section 6.2.3.1, (on page 6-19) provides that EAP – 4A, "On-shift Dose Assessment," will be utilized from the onset of a release to approximately 1 hour post-accident.

However, attachment 3, Table 5-1, "Plant Personnel – Emergency Activity Assignments," (on page 5-22) does not provide an on-shift position to perform radiological accident assessment function.

Please explain why no individual was provided on Table 5-1 to perform the radiological accident function or revise accordingly.

**Hearing Identifier:** NRR\_PMDA  
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