



**Entergy Nuclear Northeast  
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**Brian R. Sullivan**  
Site Vice President - JAF

JAFP-16-0113  
July 6, 2016

10 CFR 50.90  
10 CFR 50.54(q)(4)

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

**Subject:** License Amendment Request to Revise the James A. FitzPatrick Emergency Plan to Address the Permanently Defueled Condition – Supplement 1 (CAC No. MF7347)

James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
License No. DPR-59

- References:**
1. ENOI letter, License Amendment Request to Revise the James A. FitzPatrick Emergency Plan to Address the Permanently Defueled Condition, JAFP-16-0012, dated February 4, 2016
  2. NRC letter, Request for Additional Information Regarding Proposed Emergency Plan Change Amendment for the Permanently Defueled Condition, ML16152A183, dated May 24, 2016
  3. NRC letter, Supplemental Request for Additional Information Regarding Proposed Emergency Plan Change Amendment for the Permanently Defueled Condition, ML16159A026, dated June 3, 2016

Dear Sir or Madam:

By letter dated February 4, 2016 (Reference 1), Entergy Nuclear Operations, Inc. (ENO) proposed an amendment to Renewed Facility Operating License (OL) DPR-59 for the James A. FitzPatrick Nuclear Power Plant (JAF). The proposed amendment would revise the JAF Emergency Plan for the permanently defueled condition. Specifically, the proposed changes would revise the on-shift staffing and Emergency Response Organization (ERO) staffing levels.

In References 2 and 3, the NRC provided JAF with Requests for Additional Information (RAI) regarding the proposed emergency plan changes. Attachment 1 of this letter provides the responses to the RAI.

The conclusions of the no significant hazards consideration and the environmental considerations contained in Reference 1 are not affected by, and remain applicable to, this supplement.

Attachment 2 contains a list of new Regulatory Commitments. If you should have any questions regarding this transmittal, please contact Mr. James D. Jones, Emergency Planning Manager, at 315-349-6030.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 6, 2016.

Sincerely,



Brian R. Sullivan  
Site Vice President

BRS/JDJ/pc

Attachments: 1. Response to Request for Additional Information  
2. List of Regulatory Commitments

Enclosures: 1. Presentation Material on JAF Emergency Plan Changes  
2. Correspondence Documenting Concurrence with the Proposed Changes

cc: Director, Office of Nuclear Reactor Regulation  
NRC Region I Administrator  
NRC Resident Inspector  
NRC Project Manager  
NYSPSC  
NYSERDA

**JAFP-16-0113**

**Attachment 1**

**Response to Request for Additional Information**

**(10 Pages)**

**Response to Request for Additional Information**

**RESPONSE TO 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.

**Response to Request for Additional Information**

**RAI-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.**

**Response**

Following ENO’s announcement and certification to permanently cease operations at JAF (References 1 and 2), decommissioning-related emergency plan submittals for JAF have been discussed with offsite response organizations. These discussions have addressed future changes to onsite and offsite emergency preparedness throughout the decommissioning process. At meetings held with Oswego County on February 8, 2016 and with the State of New York on April 14, 2016, JAF discussed the emergency preparedness submittals made to date, as well as pending submittals related to requests for exemptions from portions of 10 CFR 50.47 and Appendix E to 10 CFR 50 and the Permanently Defueled Emergency Plan, including the Permanently Defueled Emergency Action Levels. The presentations described the on-shift and ERO staffing changes included in Reference 3, including a specific discussion of the ERO positions proposed for elimination. This information was presented again on May 11, 2016 at a meeting attended by various emergency management representatives from the affected State and local response organizations, and by representatives from the NRC and FEMA. The material presented at those sessions is enclosed with this letter.

## **Response to Request for Additional Information**

In separate emails dated June 1, 2016, JAF requested confirmation from State of New York and Oswego County emergency management representatives that they had reviewed the proposed changes to the JAF emergency plan and concurred with ENO that potential impacts on the ability to implement the FEMA-approved REP plans do not exist. A response was requested by June 17, 2016. On June 20, 2016, when no response had been received by either party, follow up emails were sent. ENO did receive concurrence with the proposed changes to the JAF emergency plan from Oswego County and that documentation is provided as an enclosure with this letter. As of the date of this letter, no response has been provided by State of New York emergency management representatives. Multiple follow-up requests via telephone have been made to State of New York emergency management representatives for a reply to the information request with no response received as of the date of this correspondence.

### **RAI-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.**

### **Response**

JAF has not yet finalized a schedule of drills that will be conducted. When the dates are finalized, the NRC will be notified through the Office of Nuclear Reactor Regulation Project Manager and provided with a schedule.

## Response to Request for Additional Information

### RAI-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.**

### Response

Attachment 5 of Reference 3 identifies the primary duties of the TSC Engineer positions, including: responding to engineering requests from the Engineering Coordinator, evaluating the implementation of Severe Accident Management Guidelines, and assisting the OSC in preparing to send repair teams into the plant. These duties, described in implementing procedures, are either no longer necessary in a permanently defueled condition or will be performed by other members of the post-shutdown ERO. For example, the Maintenance Coordinator maintains responsibility for assisting the OSC in preparing to send repair teams into the plant, therefore the function is maintained even though the TSC Engineer position will no longer be in place.

The Engineering Coordinator is tasked with performing an engineering assessment of plant conditions and/or actions needed to mitigate damage to the plant. With respect to responding to engineering requests from the Engineering Coordinator, this function will continue to be performed by augmented engineering resources that will respond and be utilized, as required. JAF emergency plan implementing procedures will continue to direct the Engineering Coordinator to continuously evaluate the need for engineering resources and coordinate with the EOF Administration and Logistics Coordinator to call in additional engineering assistance, as needed. These individuals may be tasked with activities to be completed at engineering offices external to the TSC, called to report to the TSC, or directed to other facilities as needed.

JAF Emergency Plan implementing procedures will continue to identify engineering resources as augmented positions with specific training and qualification requirements for assigned personnel in accordance with the site training program. The required training courses and requalification frequencies will be unchanged in the post-shutdown condition. However, these positions will no longer be identified as on-call positions. As described in Reference 3, the elimination of the TSC Engineer positions is justified because the spectrum of credible accidents and operational events, and the quantity and complexity of activities and systems, structures

## Response to Request for Additional Information

and components required for the safe storage of spent nuclear fuel is reduced as compared to an operating plant. Additionally, any credible accidents or events involving the spent fuel pool are expected to evolve slowly, allowing for additional engineering resources to be maintained on an on-call or as-needed basis.

**b. Please provide justification that the engineering coordinator can perform all required engineering support activities for the applicable postulated accidents.**

Response

See response to part a, above.

**RAI-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.**

Response

Note F for Table 5-1, Plant Personnel – Emergency Activity Assignments, in Attachment 3 of Reference 3 indicates that emergency electrical maintenance requires call-in of applicable departmental personnel to conduct tasks. Normal operations shift personnel can conduct limited emergency electrical work, if necessary. The function of this position is to provide for minor or limited scope damage repair and corrective actions such as changing fuses; the installation and removal of jumpers; identification and correction of controller and setpoint maladjustment, tripped breakers and overloads; surveillance necessary for accident mitigation; and/or hands off troubleshooting. These are the only activities that can be accomplished in the time frame in question. Attachment 4 of Reference 3, JAF Analysis of Proposed Post-Shutdown On-Shift Staffing, defines repair and corrective action as: “An action that can be performed promptly to restore a nonfunctional component to functional status (e.g., resetting a breaker), or to place a component in a desired configuration (e.g., open a valve), and which does not require work planning or implementation of lockout/tag out controls to complete.”

During the initial stages of an event, the major response activities are concentrated on determining the cause of the event and placing the plant in a safe condition through plant manipulations and system alignments. The on-shift Nuclear Plant Operators/Non-Certified Operators (NPOs/NCOs) will have the necessary expertise and training to perform troubleshooting and minor repairs during plant operations. Therefore, the NPOs/NCOs would be available to satisfy any minor troubleshooting and repair activities that might be needed in the initial stages of an emergency.



## Response to Request for Additional Information

NUREG-0654, Table B-1, indicates that repair and corrective action tasks may be performed by qualified shift personnel who are assigned other emergency response functions/tasks. JAF NPOs are trained to perform the actions associated with the repair and corrective action functional area and would be able to do so during an event. In addition, repair and corrective action is an acceptable collateral duty in accordance with the guidance in NEI 10-05.

Attachment 4 of Reference 3, JAF Analysis of Proposed Post-Shutdown On-Shift Staffing, concluded that in a permanently defueled condition, NPOs/NCOs can perform this required action in a timely manner and there are no collateral duties that would prevent the timely performance of this task.

**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.**

Response

The Rad Waste Operator on-shift position is retained and is the responsibility of an on-shift NPO/NCO as indicated in Note H of Table 5-1, Plant Personnel – Emergency Activity Assignments, contained in Attachment 3 of Reference 3. The on-shift NPOs/NCOs will retain the necessary skills and knowledge to perform the radwaste operator function.

During the initial stages of an event, the major response activities are concentrated on determining the cause of the event and placing the plant in a safe condition through plant manipulations and system alignments. The on-shift NPOs/NCOs will have the necessary expertise and training to perform troubleshooting and minor repairs during plant operations. The NPOs/NCOs would be available to satisfy any minor troubleshooting and repair activities that might be needed.

NUREG-0654, Table B-1, indicates that repair and corrective action tasks may be performed by qualified shift personnel assigned other emergency response functions/tasks. JAF NPOs are trained to perform the actions associated with the repair and corrective action functional area. In addition, repair and corrective action is an acceptable collateral duty in accordance with the guidance in NEI 10-05.

Attachment 4 of Reference 3, JAF Analysis of Proposed Post-Shutdown On-Shift Staffing, concluded that in a permanently defueled condition, NPOs/NCOs can perform this required emergency plan action in a timely manner and there are no collateral duties that would prevent the timely performance of this task.

## Response to Request for Additional Information

### **RAI- 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.**

### **Response**

The JAF Fire Brigade complement currently consists of one of the three Senior Nuclear Operators on-shift and four NPOs. As described in Reference 3, the proposed changes to the JAF Emergency Plan will eliminate the three Senior Nuclear Operators and one NPO. Operations on-shift personnel will consist of one Shift Manager (SM), one Control Room Supervisor (CRS) and three NPOs, as well as 2 additional Fire Brigade qualified staff. Note H of Table 5-1, Plant Personnel – Emergency Activity Assignments, states the JAF Fire Brigade complement is three NPOs/NCOs and two other qualified staff.

Figure 5-2, J.A.F.N.P.P. Defueled Emergency Staffing On Shift Response Organization, in the JAF Emergency Plan is a general description of the on-shift functions and is not intended to imply that the Fire Brigade is comprised of personnel in addition to the on-shift staff. The Fire Brigade block denotes the possibility that qualified individuals, in addition to NPO/NCOs, may comprise portions of the Fire Brigade.

JAF will enter the permanently defueled condition utilizing a five-member Fire Brigade. The Fire Brigade leader and at least two additional Fire Brigade members will have sufficient training in, or knowledge of, plant systems to understand the effects of fire and fire suppressants. The Fire Brigade leader will be competent to assess the potential safety consequences of a fire and advise Control Room personnel. All existing Fire Brigade training and qualification requirements will be maintained.

### **RAI-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.**

## **Response to Request for Additional Information**

### **Response**

The Major Functional Area of Radiological Accident Assessment in Table 5-1, Plant Personnel – Emergency Activity Assignments directs the reader to Note D. The Major Task under this functional area is to “Direct dose projections, radiological surveys, interface with State”. The task is not to “perform” the functions, but to “direct” the functions. Therefore, the Shift Manager is the appropriate position to direct the Radiological Accident Assessment Major Functional Area. Note D to Table 5-1 indicates the task is performed by the on-shift Radiation Protection Specialist, as directed by the Shift Manager/Emergency Director until the arrival of Radiation Protection and/or Chemistry Department supervision.

Section II.A of Attachment 4 of Reference 3, JAF Analysis of Proposed Post-Shutdown On-Shift Staffing, indicates that the Radiation Protection Specialist is assigned Accident/Dose Assessment responsibilities in the Fuel Handling analyses and there are no Accident/Dose Assessment tasks identified as being required during the remaining analyses. Additionally, Section II.C.2 states that the Radiation Protection Specialist is assigned the function of dose assessment. The analysis concluded that in a permanently defueled condition, the Radiation Protection Specialist can perform this required emergency plan action in a timely manner and there are no collateral duties that would prevent the timely performance of this task.

### **RAI-7**

**Attachment 2, Section 1.1, (on page 3 of 39) provides the following basis for removal of the Emergency Response Data System (ERDS) from service:**

**The ERDS requirement in Appendix E to 10 CFR50 exempts “all nuclear power facilities that are shut down permanently” from the need to provide an ERDS interface with the NRC. Elimination of ERDS will be dispositioned in accordance with the requirements in 10 CFR 50.54(q), “Conditions of licenses,” related to emergency preparedness, and specifically to making changes to emergency response plans.**

- a. Please discuss whether ENO provides or has made a commitment to provide ERDS or similar plant data link to the State of New York or local response organizations.**

### **Response**

The JAF Emergency and Plant Information Computer and the Meteorological Data Acquisition System export data to ERDS and the Plant Data Server (PDS). ERDS sends the selected current plant data points to the NRC Operations Center on a periodic basis. PDS is available to the State of New York and Oswego County in their respective Emergency Operations Centers (EOCs). The proposed changes to the JAF Emergency Plan conservatively assume that ERDS will not be available in the permanently defueled condition, consistent with regulation. However, ENO has not made a final decision as to if or when the JAF ERDS link will be removed from service.

There are no ERDS data points associated with the spent fuel pool or the Independent Spent Fuel Storage Installation. In a permanently shut down and defueled condition, the only valid ERDS data points remaining are radiological effluent data, radiation monitoring data, reactor building pressure data, and meteorological data. While some of this information would be used

### **Response to Request for Additional Information**

for emergency dose assessment and determination of public protective action recommendations, JAF does not rely on ERDS to provide this data to the JAF Emergency Response Facilities, the JAF ERO, or to the offsite agencies responsible for making Protective Action Decisions. Rather, JAF provides the necessary data to the offsite response organizations via PDS. Because JAF provides data to the State of New York and Oswego County via PDS, JAF does not rely on the ability of the State of New York or Oswego County to access ERDS for the provision of data.

JAF maintains the capability to provide plant data necessary to the offsite authorities to perform dose assessment and determine public protective actions via numerous other means, including direct access to PDS. In the event of an emergency declaration, JAF would provide any and all information requested by the offsite response organizations, unless the information requested were safeguards-related. This capability has been demonstrated and evaluated during numerous drills and NRC- and FEMA-evaluated exercises.

- b. Please provide documentation that affected State and local response organizations have performed a review of the proposed changes to the JAF Emergency Plan and that potential impacts do not exist with respect to the elimination of ERDS in support of offsite radiological assessment and protective action decision-making. If impacts are identified, please provide documentation of the commitment by applicable State and/or local organization to revise their REP plans accordingly.**

#### Response

In separate emails dated June 23, 2016, JAF requested confirmation from the State of New York and Oswego County emergency management representatives requesting acknowledgment that the removal of ERDS does not impact the ability of the offsite response organizations to implement the FEMA-approved REP plans. Multiple follow-up requests via telephone have been made to State of New York emergency management representatives for a reply to the information request with no response received as of the date of this correspondence.

The correspondence to the State of New York requested acknowledgement of the removal of ERDS and the need for revision of Procedure H of the New York State Comprehensive Emergency Management Plan, Radiological Hazards Annex for Fixed Nuclear Facilities to reflect this removal. ENO recognizes the importance of stakeholder engagement in these matters, and ENO respectfully submits that termination of ERDS is more appropriate for evaluation under a licensee controlled process, such as 10 CFR 50.54(q), because current NRC regulations recognize that ERDS is not required in the permanently defueled condition. As stated in Section 2.0 of Attachment 1 of Reference 3, only the changes involving a reduction in staffing were submitted for NRC approval. Other changes, including justification for the elimination of ERDS, will be evaluated under the provisions of 10 CFR 50.54(q).

Notwithstanding the above, ENO has reviewed the applicable State and County REP plans and will take steps to ensure that affected emergency response organizations are notified of the termination of ERDS in advance, as discussed below.

### **Response to Request for Additional Information**

Oswego County does not utilize ERDS and it is not referenced in their Radiological Emergency Plan. New York State does not rely on ERDS as a primary means of receiving plant-specific information. However, ERDS is listed as a resource in the New York State Radiological Emergency Plan. JAF will continue to provide plant-specific information to Oswego County and New York State via multiple methods including computer-based data systems and telecommunications capabilities.

Prior to the final termination of ERDS link, which could occur at any time after permanent defueling, the State of New York and Oswego County emergency management representatives will be notified and a proposed markup of Procedure H will be provided to the State of New York. These actions are included as new regulatory commitments in Attachment 2.

### **References**

1. Letter, Entergy Nuclear Operations, Inc. to USNRC, Notification of Permanent Cessation of Power Operations," JAFP-15-0133, dated November 18, 2015 (ML15322A273)
2. Letter, Entergy Nuclear Operations, Inc. to USNRC, Certification of Permanent Cessation of Power Operations, JAFP-16-0045, dated March 16, 2016 (ML16076A391)
3. Letter, Entergy Nuclear Operations, Inc. to USNRC, "License Amendment Request to Revise the James A. FitzPatrick Emergency Plan to Address the Permanently Defueled Condition," JAFP-16-012, dated February 4, 2016 (ML16035A309)

**JAFP-16-0113**

**Attachment 2**

**List of Regulatory Commitments**

**(1 Page)**

### List of Regulatory Commitments

This table identifies actions discussed in this letter for which Entergy commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are **not** commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Provide the State of New York with a proposed markup of Procedure H of the New York State Comprehensive Emergency Management Plan, Radiological Hazards Annex for Fixed Nuclear Facilities that addresses the elimination of ERDS.	<b>X</b>		Prior to the disposition of ERDS in accordance with the requirements in 10 CFR 50.54(q).
Notify the State of New York and Oswego County of the termination of the ERDS link.	<b>X</b>		Prior to the termination of ERDS.

**JAFP-16-0113**

**Enclosure 1**

**Presentation Material on JAF Emergency Plan Changes**

**(52 Pages)**





INTEROFFICE  
CORRESPONDENCE

24 Feb 2016  
JEP-16-0006

TO: FILE

FROM: James D. Jones  
Manager Emergency Planning

SUBJECT: Activities and Interactions with Co-Located Licensee

A meeting was conducted on 2-8-2016 with Oswego County, Exelon (Nine Mile Point) and Entergy (JAF) to discuss the attached JAF Decommissioning topics.

In attendance:

- Dale Currier (Director Oswego County Emergency Management Office)
- Sara McMahon (Oswego County Emergency Management Office Rad Officer)
- Jim Jones (Manager, Emergency Planning, Entergy FitzPatrick)
- Terry Bennett (Oswego County Emergency Management Office)
- Tony Verno (Exelon NMP)
- Scott Chubon (Oswego County Emergency Management Office Rad Officer)
- Chuck Wright (NYSOEM)

# JA FitzPatrick Decommissioning Update: February 2016

James D. Jones  
EP Manager



1

## Purpose

- To present an update of the decommissioning activities for JAF

2

## Allowable Decommissioning Methods

### ➤ DECON

- The equipment, structures, and portions of the facility and site that contain radioactive contaminants are removed or decontaminated to a level that permits termination of the license after cessation of operations.

### ➤ SAFSTOR

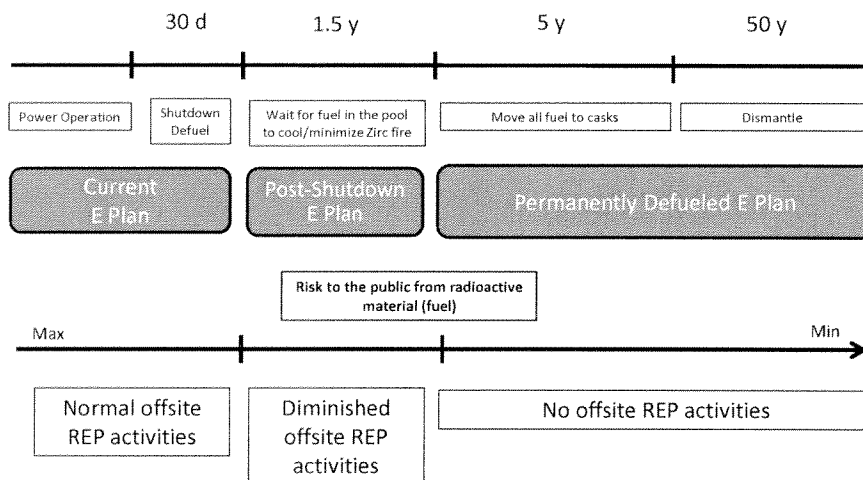
- The facility is placed in a safe, stable condition and maintained in that state until it is subsequently decontaminated and dismantled to levels that permit license termination. During SAFSTOR, a facility is left intact, but the fuel has been removed from the reactor vessel and radioactive liquids have been drained from systems and components and then processed. Radioactive decay occurs during the SAFSTOR period, thus reducing the levels of radioactivity in and on the material and, potentially, the quantity of material that must be disposed of during decontamination and dismantlement.

### ➤ ENTOMB

- ENTOMB involves encasing radioactive structures, systems, and components (SSCs) in a structurally long-lived substance, such as concrete. The entombed structure is appropriately maintained, and continued surveillance is carried out until the radioactivity decays to a level that permits termination of the license.

3

## Timeline



4

## Milestones

- 2-5-2016: Submission of Phase 1 JAF Emergency Plan changes to the NRC
  - Reduced the spectrum of accidents
    - Spent Fuel Handling accident
  - Reduced On-Shift staffing
  - Reduced augmented ERO
  - No change to offsite liaison staffing
  - No change to emergency facilities

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## Milestones

- 2-5-2016: Submission of Phase 1 JAF Emergency Plan changes to the NRC
  - Expect NRC will take ~ 1 year to approve
  - Phase 1 Emergency Plan would be implemented ~ June 2018

6

## Upcoming Milestones

- Develop procedures and processes to implement the Phase 1 JAF Emergency Plan
- Begin development of the Phase 2 JAF Emergency Plan changes

7

Questions?

8

# JA FitzPatrick EP Decommissioning Update for Offsite Stakeholders: **April 2016**

James D. Jones  
EP Manager



# Agenda

- Introduction
- Purpose of the meeting
- Timeline
- Plant actions anticipated to be taken after shutdown
- Review of EP-related Shutdown Actions Submitted to the NRC
- Review of EP-related Shutdown Actions Planned or in Process
- Anticipated NRC submittals
- Summary of issues that affect offsite emergency planning
- Questions

# Purpose

- To present an update of the JAF shutdown-related Emergency Planning activities to offsite stakeholders involved in Radiological Emergency Planning (REP)



# Allowable Decommissioning Methods

## ➤ **DECON**

- The equipment, structures, and portions of the facility and site that contain radioactive contaminants are removed or decontaminated to a level that permits termination of the license after cessation of operations.

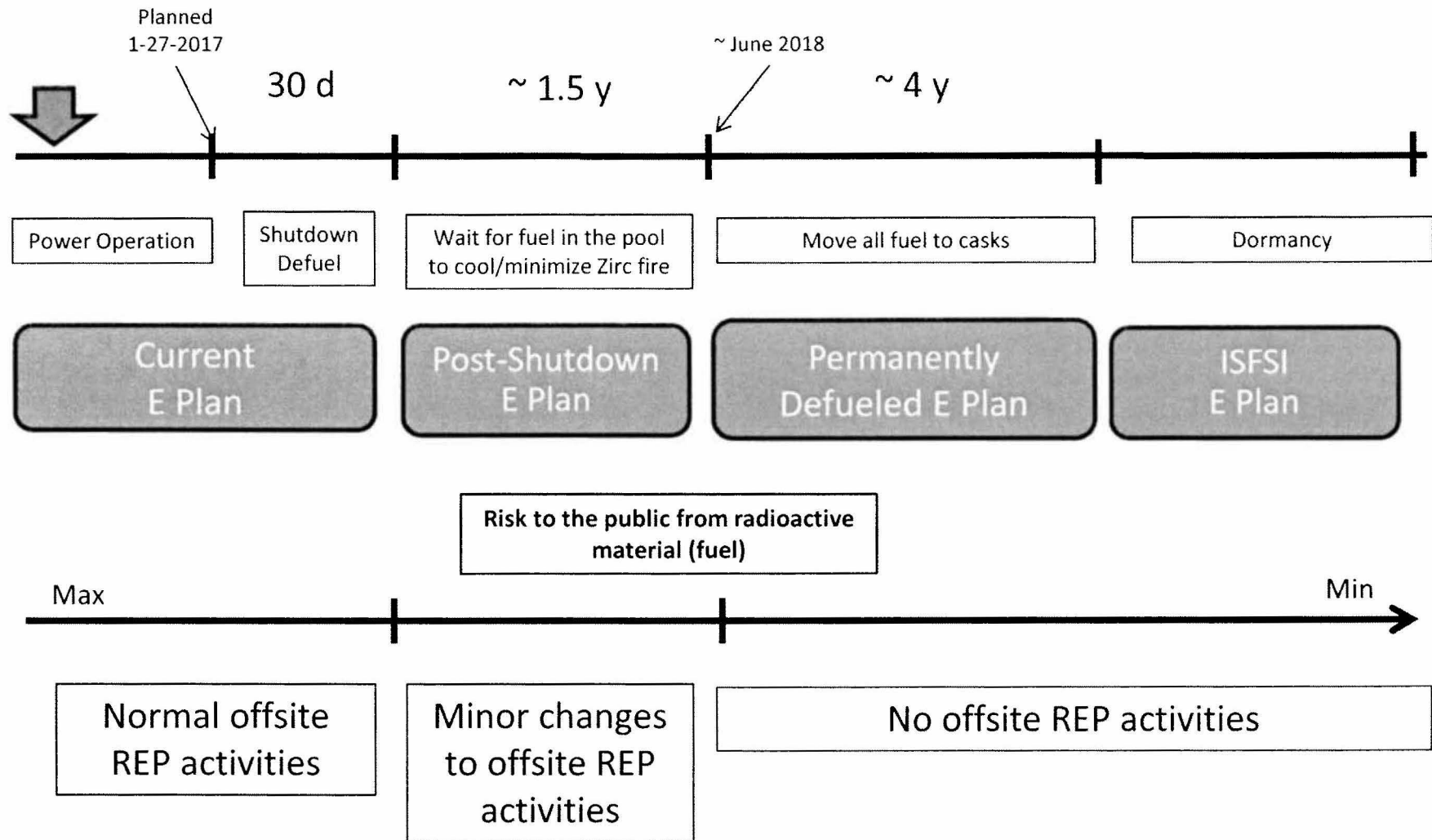
## ➤ **SAFSTOR**

- The facility is placed in a safe, stable condition and maintained in that state until it is subsequently decontaminated and dismantled to levels that permit license termination. During SAFSTOR, a facility is left intact, but the fuel has been removed from the reactor vessel and radioactive liquids have been drained from systems and components and then processed. Radioactive decay occurs during the SAFSTOR period, thus reducing the levels of radioactivity in and on the material and, potentially, the quantity of material that must be disposed of during decontamination and dismantlement.

## ➤ **ENTOMB**

- ENTOMB involves encasing radioactive structures, systems, and components (SSCs) in a structurally long-lived substance, such as concrete. The entombed structure is appropriately maintained, and continued surveillance is carried out until the radioactivity decays to a level that permits termination of the license.

# Potential Timeline \*

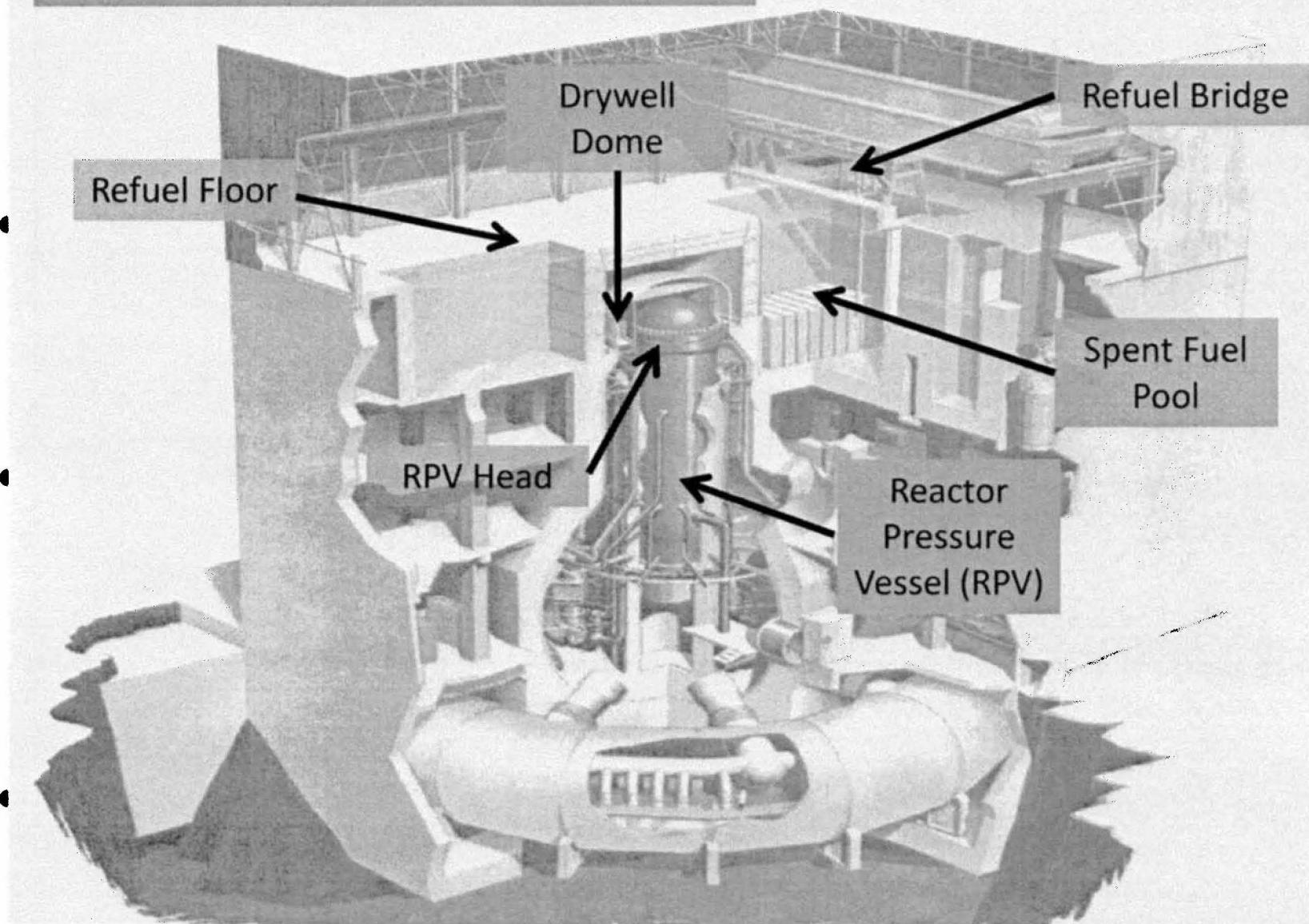


\* Dependent on decommissioning method chosen

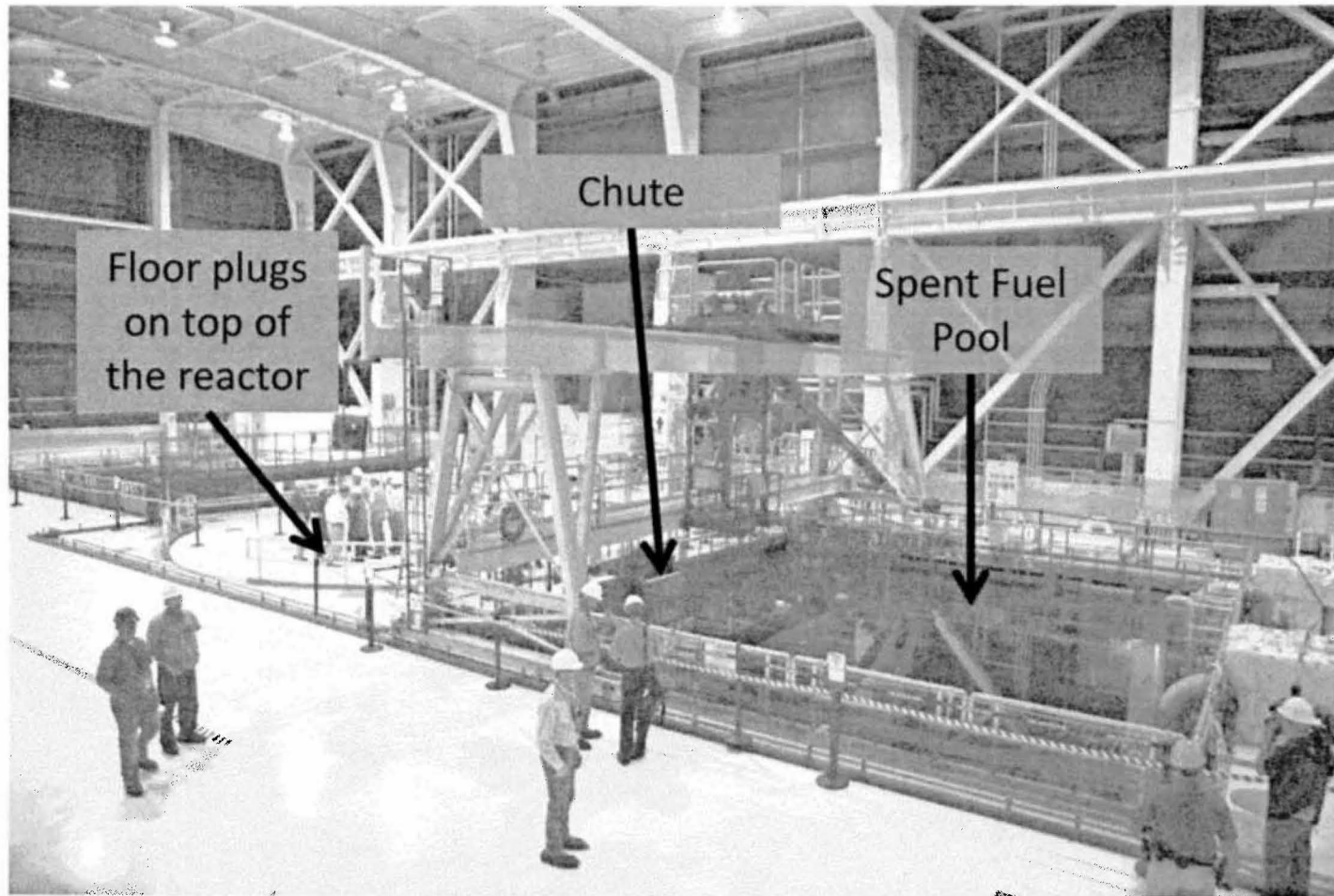
# Timeline: Where we stand

- JAF plans on continuing power operations until 1-27-2017
- Within 2-4 weeks of cessation of operations, we plan to open the reactor and move all fuel to the Spent Fuel Pool
- JAF plans on implementing the NRC-approved Post-Shutdown Emergency Plan (PSEP) (by the end of February 2017)

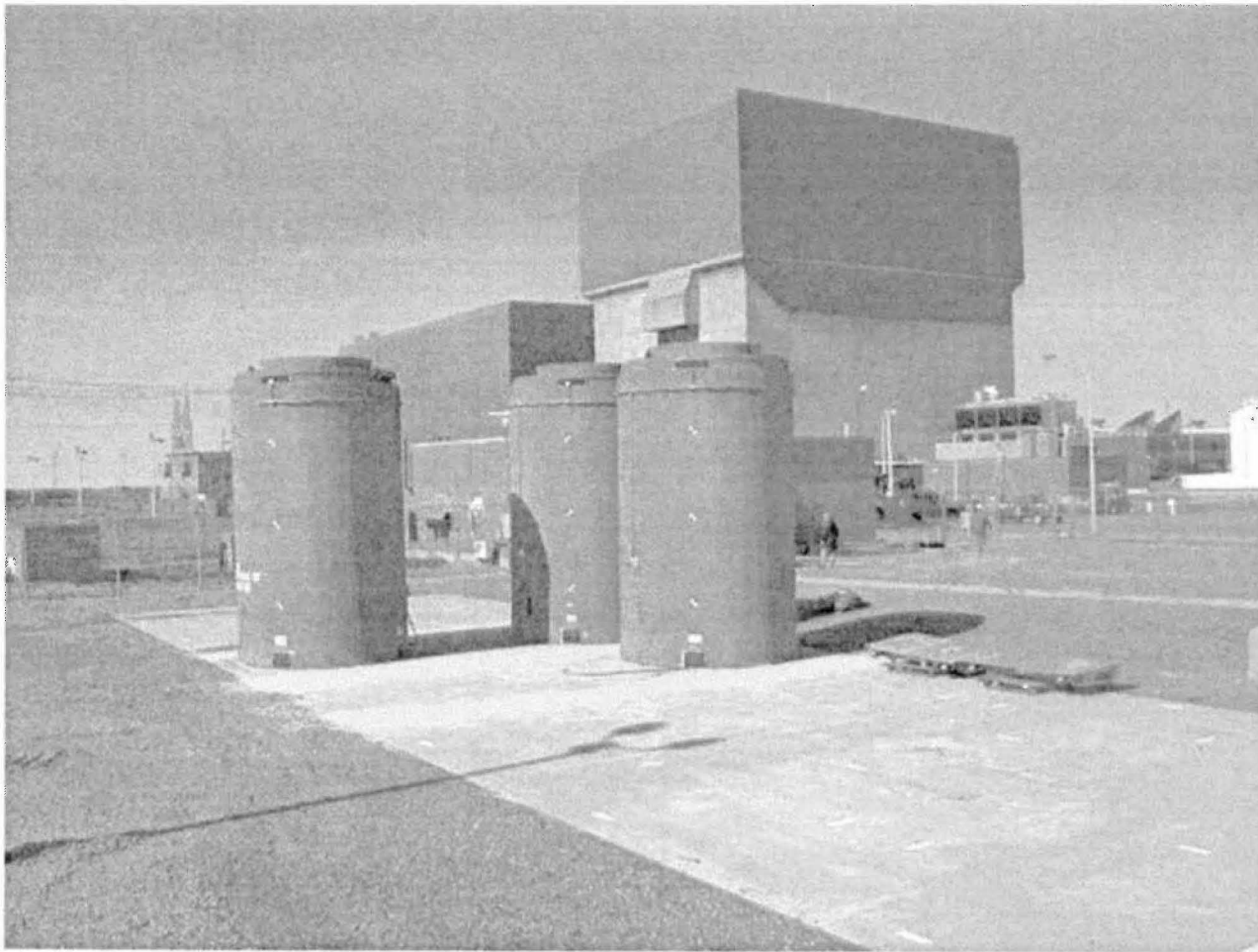
## Entergy JAF Reactor Cutaway



# Refuel Floor

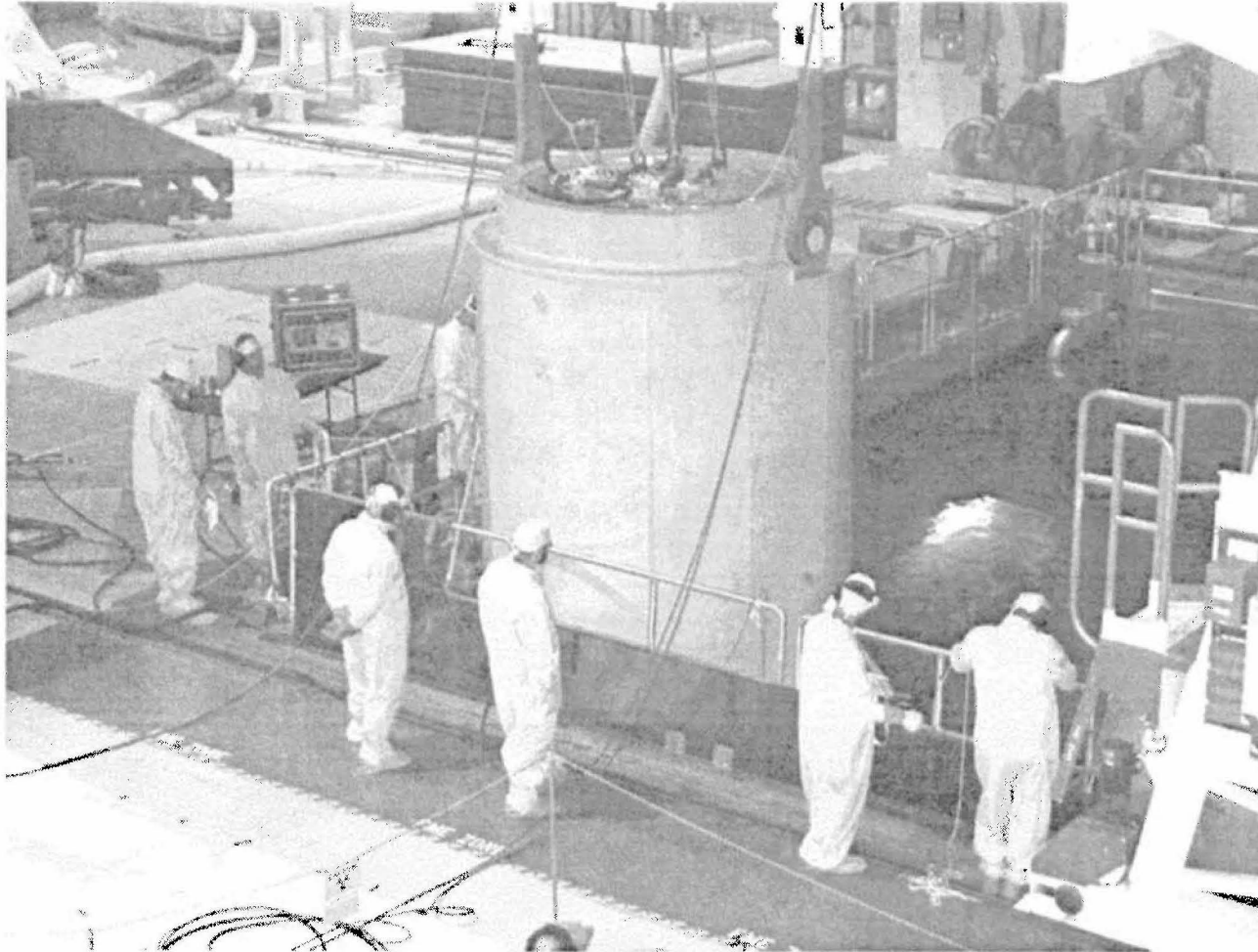


# ISFSI\* Pad and Dry Storage Casks

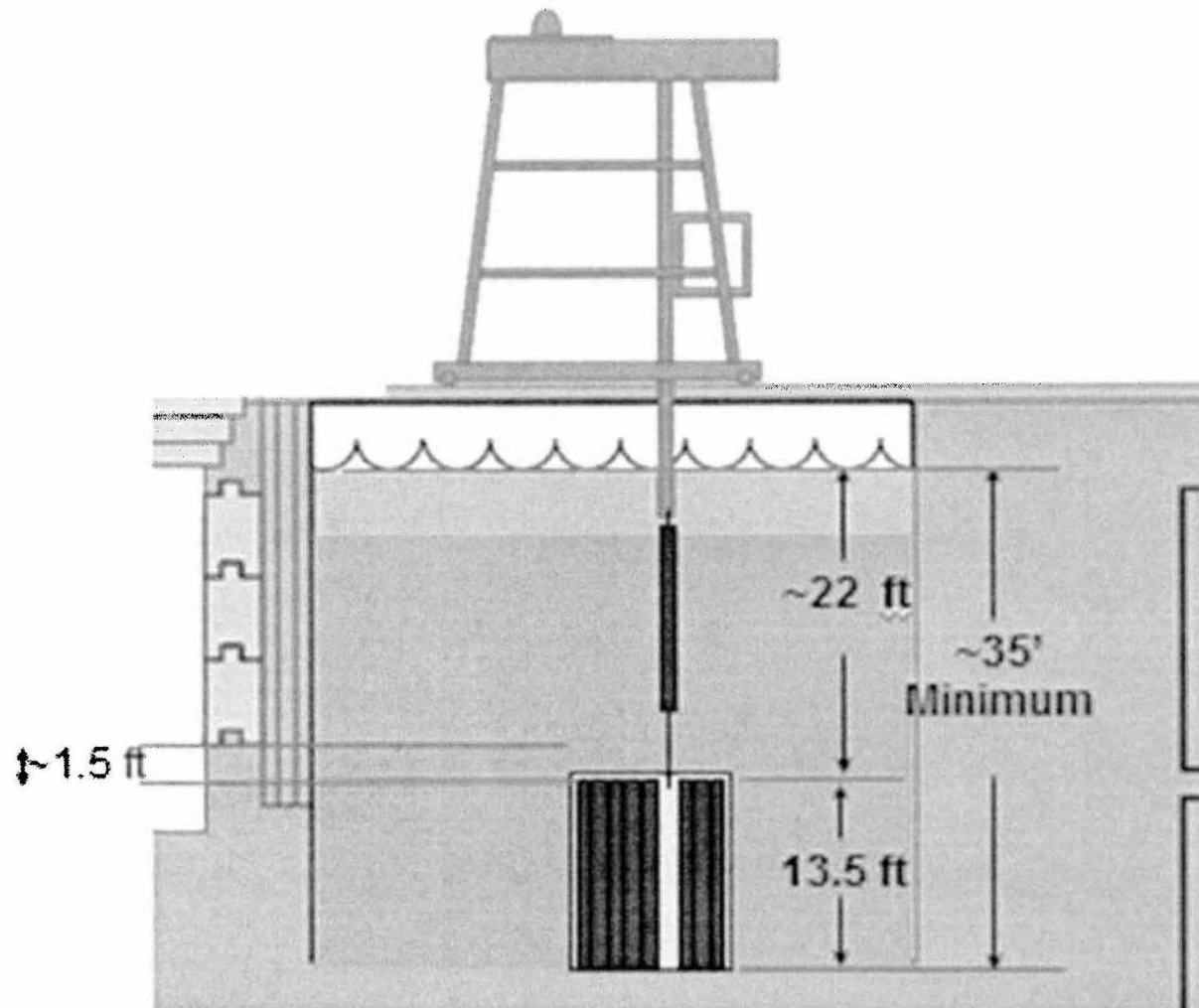


\* Independent Spent Fuel Storage Installation

# ISFSI Cask Being Lowered into JAF Spent Fuel Pool



# JAF Spent Fuel Pool





# Review of EP-related Shutdown Actions Submitted to the NRC

- JAF submitted to the NRC a License Amendment Request for approval of the JAF PSEP (2-4-2016).
  - NRC review process is expected to take ~ 1 year
  - Anticipate PSEP implementation in February 2017
  - Submittal is available via the NRC website or call me and I will send it to you

# Review of EP-related Shutdown Actions Submitted to the NRC

- The JAF PSEP License Amendment Request involves
  - Reducing the spectrum of accidents covered by the Plan
    - Spent Fuel Handling accident remains
  - JAF will still be required to respond to
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    - Natural events (storms, earthquakes)
    - Hostile Action Based Events
    - Fires

# Review of EP-related Shutdown Actions Submitted to the NRC

- The JAF PSEP License Amendment Request involves
  - Reduced On-Shift staffing
    - Current staffing: 14 positions
    - PSEP staffing: 8 positions
  - Analysis demonstrates that we maintain the effectiveness of the (revised) emergency plan with proposed staffing levels

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- The JAF PSEP License Amendment Request involves
  - Reduced augmented ERO
    - Current staffing: 46 positions
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- The JAF PSEP License Amendment Request involves
  - No change to offsite liaison staffing
    - PSEP staffing includes
      - Liaison to County EOC
      - Liaison to State EOC
      - Lead Liaison in the EOF

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- The JAF PSEP License Amendment Request involves
  - No change to emergency facilities
    - Control Room
    - EOF
    - JIC
    - TSC
    - OSC
    - Alternative facilities

# Review of EP-related Shutdown Actions Planned or in Process

- Draft products that will implement the PSEP
  - Procedure changes
  - Development of Post-Shutdown ERO (onshift and augmented)
    - We will continue a 4 team rotation
    - 60 minute response requirement maintained for key positions
  - Train ERO
  - Conduct drills
  - Complete 4<sup>th</sup> Quarter 2016

## Anticipated NRC submittals

- Plan to submit Permanently Defueled Emergency Plan (PDEP) to the NRC in September 2016
  - If NRC-approved, anticipate PDEP implementation in June 2018.



## Summary of issues that affect offsite emergency planning during the Post-Shutdown Phase

- Incidents that could occur during the Post Shutdown phase may result in rad releases that exceed PAGs
- There are no planned changes to offsite REP requirements
- JAF will maintain most emergency response capabilities during the Post-Shutdown phase including
  - Emergency Response Organization
  - Drills and exercises
  - Facilities and equipment

# Questions?

## **Emergency Planning**

- Jim Jones  
315-349-6030
- Peter Cullinan  
315-349-6859

## **Other**

- Tammy Holden  
Nuclear Communications  
315-349-6681

**JAF Emergency Planning  
Monthly Decommissioning Update for Offsite Stakeholders**

**Attendees**

Name (print)	Agency Representing	Initial	Email
Cynthia Costello	NYS DOH	CAC	
Bridget Frymire	NYS PSC	BAF	
Chris Del Giudice	Greenberg Traurig For ENTERGY	CIDG	
Joanne Terrodo	Entergy		
Pete Cullinan	Entergy-JAF	PLC	
Tim Jones	Entergy		
Sheldon Kohr	Entergy		
Rosa Mendez	NYS DOH	RFH	
Tom Papina	NYS DEC	TIAP	
Janice Dean	NYSERDA	JD	
Tim Price	NYS DEC	TPH	
Nikhil Natarajan	NYS OEM	N	
John Layton	NYS OEM	JB	
Chuan Wang	NYS OEM	Chuan	
Lydia Gault	NYS OEM	LG	
Kristine Hoffman	DHSES	KH	
Amy Phoenix	DHSES OEM	AP	
John Kowalewski	NYS OEM	JK	

**CONTACT  
INFORMATION  
REDACTED**

# JA FitzPatrick EP Decommissioning Update for Offsite Stakeholders: **April 2016**

James D. Jones  
EP Manager



1

## Agenda

- Introduction
- Purpose of the meeting
- Timeline
- Plant actions anticipated to be taken after shutdown
- Review of EP-related Shutdown Actions Submitted to the NRC
- Review of EP-related Shutdown Actions Planned or in Process
- Anticipated NRC submittals
- Summary of issues that affect offsite emergency planning
- Questions

2

## Purpose

- To present an update of the JAF shutdown-related Emergency Planning activities to offsite stakeholders involved in Radiological Emergency Planning (REP)

3

## Allowable Decommissioning Methods

### ➤ DECON

- The equipment, structures, and portions of the facility and site that contain radioactive contaminants are removed or decontaminated to a level that permits termination of the license after cessation of operations.

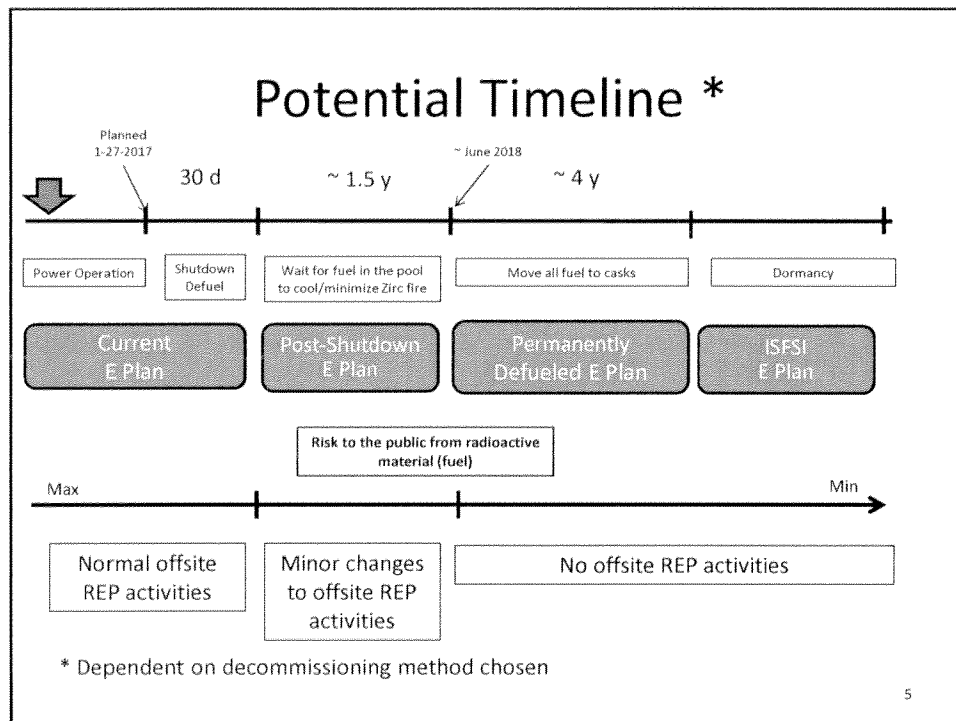
### ➤ SAFSTOR

- The facility is placed in a safe, stable condition and maintained in that state until it is subsequently decontaminated and dismantled to levels that permit license termination. During SAFSTOR, a facility is left intact, but the fuel has been removed from the reactor vessel and radioactive liquids have been drained from systems and components and then processed. Radioactive decay occurs during the SAFSTOR period, thus reducing the levels of radioactivity in and on the material and, potentially, the quantity of material that must be disposed of during decontamination and dismantlement.

### ➤ ENTOMB

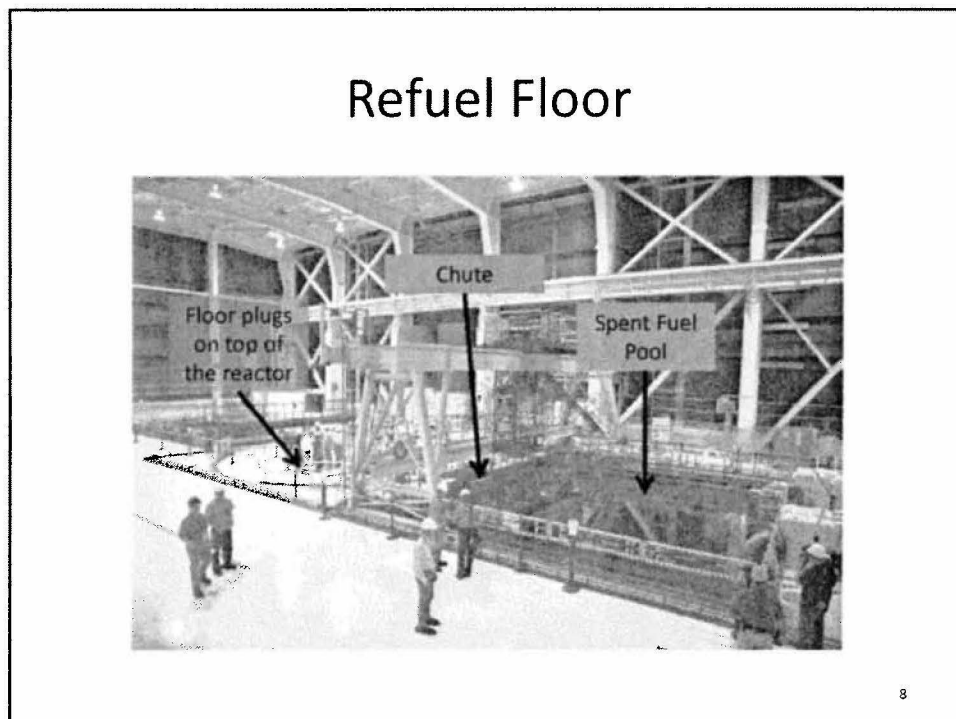
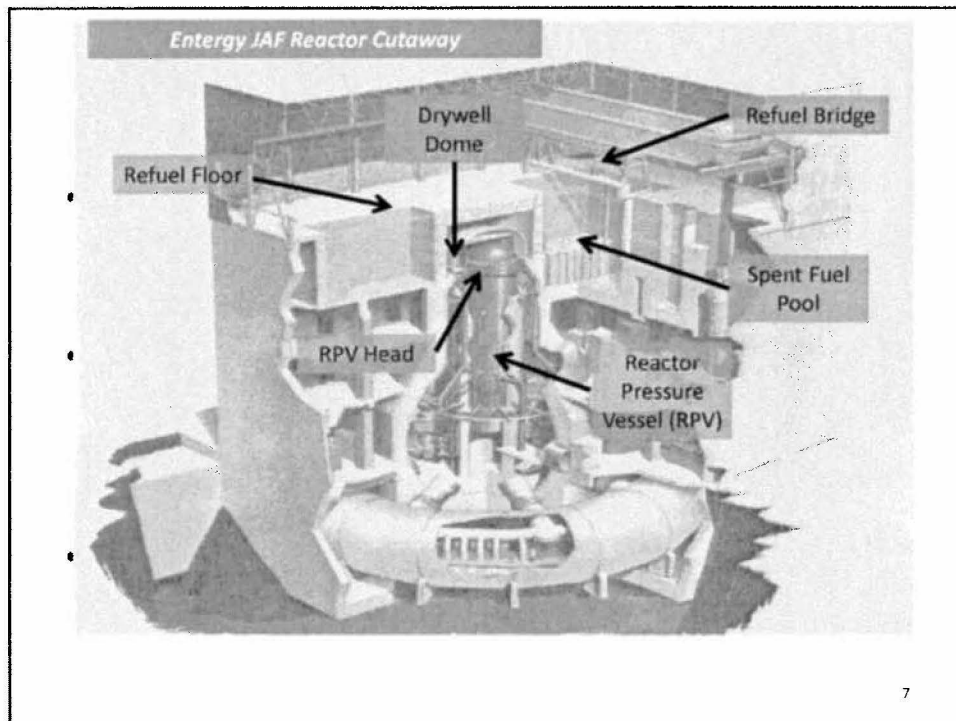
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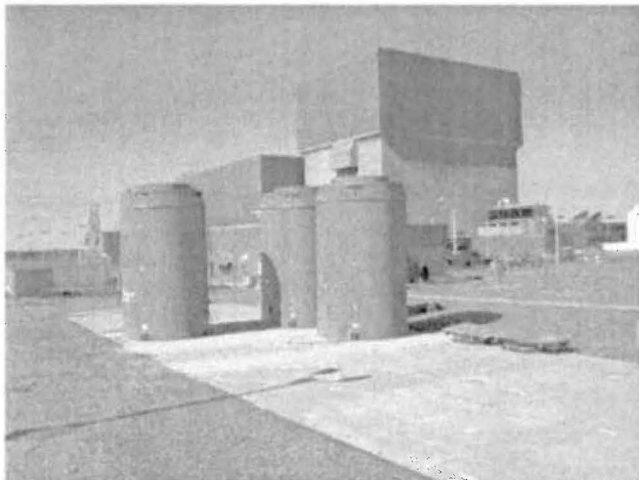


## Timeline: Where we stand

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## ISFSI\* Pad and Dry Storage Casks



\* Independent Spent Fuel Storage Installation

9

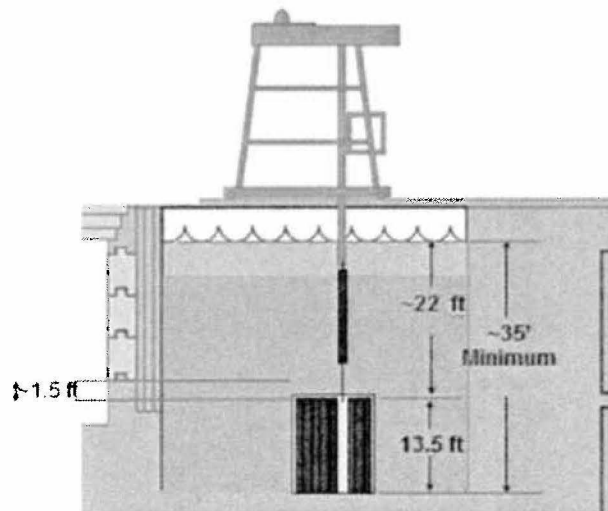
## ISFSI Cask Being Lowered into JAF Spent Fuel Pool



10



## JAF Spent Fuel Pool



11

## Review of EP-related Shutdown Actions Submitted to the NRC

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  - NRC review process is expected to take ~ 1 year
  - Anticipate PSEP implementation in February 2017
  - Submittal is available via the NRC website or call me and I will send it to you

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16

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17

## Review of EP-related Shutdown Actions Planned or in Process

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  - Development of Post-Shutdown ERO (onshift and augmented)
    - We will continue a 4 team rotation
    - 60 minute response requirement maintained for key positions
  - Train ERO
  - Conduct drills
  - Complete 4<sup>th</sup> Quarter 2016

18

## Anticipated NRC submittals

- Plan to submit Permanently Defueled Emergency Plan (PDEP) to the NRC in September 2016
  - If NRC-approved, anticipate PDEP implementation in June 2018.

19

## Summary of issues that affect offsite emergency planning during the Post-Shutdown Phase

- Incidents that could occur during the Post Shutdown phase may result in rad releases that exceed PAGs
- There are no planned changes to offsite REP requirements
- JAF will maintain most emergency response capabilities during the Post-Shutdown phase including
  - Emergency Response Organization
  - Drills and exercises
  - Facilities and equipment

20

## Questions?

### **Emergency Planning**

- Jim Jones  
315-349-6030
- Peter Cullinan  
315-349-6859

### **Other**

- Tammy Holden  
Nuclear Communications  
315-349-6681



Sign-in Sheet

NYS Nuclear Safety Sub-Committee Power Pool Meeting / May 11, 2016

#	LAST NAME	FIRST	TITLE	REPRESENTING	PHONE	E-MAIL
1	J. LURN	Rebecca	DPPIC 3	DHSES		
2	CURRIER	DALE	DIRECTOR	Orange Co EMO		
3	BASTEDO	GEORGE	↓	WAYNE Co EMO		
4	Rion	Fred	↓	Monroe County		
5	Verno	Anthony	Sr Offsite	Exelon		
6	Gilliland	Julie	SE Site Specialist	Exelon - NMP		
7	Yuricon	KATIE	EP MANAGER	Exelon - NMP		
8	McNamara	NANCY	STATE Liaison Off.	U.S. NRC		
9	GEEVES	SHARA	RED ALM. ASSIST	FEMA R/R REDP		
10	Cullen	Bill	Supervisor	FEMA - R2		
11	Westonhaus	Miriam	THIS	FEMA - R2		
12	De Rosa	Keith	Director	BMPC		
13	Stutz	Paul	EP Manager	BMPC R5		
14	Levene	Dana	EP Manager	BMPC		
15	KAVALER	Matthew	PROGRAM SPECIALIST	Westchester OEM		
16	DELBORFO	Dennis	Director, OEM	Westchester OEM		
17	Hays	Paul	Senior Consultant	Chick (Enterpy) Westchester OEM		
18	ALbanese	Ray	4 city coord	Westchester		
19	GROSSJEAN	ALAIN	SR. MGT. MGR	ENTERGY - IPEC		
20	Ferris	John	Director	Enterpy - IPEC		
21	Gelanday	Lois	EP Manager	Enterpy IPEC		
22	Jim	Jones	EP Manager	Enterpy - JAF		
23	Roland	Watts	Enterpy Consultant	Enterpy		
24	FISHER	SHANNON	COORDINATOR	ORANGE CTY		
25	HOLZ	JOHN	OPPR 2	NYS DOT		
26	POAT	WILLIAM	Public Affairs	PIPEC		
27	GIBB	JOHN	FR CONSULTANT	Enterpy/CMLC		
28	RAMOS	PABLO	COMM COORD	RL OFFS		

CONTACT INFORMATION

REDACTED



Sign-in Sheet

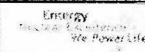
NYS Nuclear Safety Sub-Committee Power Pool Meeting / May 11, 2016

#	LAST NAME	FIRST	TITLE	REPRESENTING	PHONE	E-MAIL
29	Longo	Nicholas	Coordinator	Lockland Co.		
30	Richmond	Scott	Ex. Fellow	NYS DAM		
31	Delwiche	David	Project Officer	USDOE - NAVAL REACTORS		
32	Frimire	Bridget	PWR SYS SPECIALIST	NYS DPS		
33	Price	Tim	Production/Spec Section Chief	NYS DEC		
34	Castello	Cynthia	PRHS	NYS DCH		
35	Klotz	Charon	Emergency Disaster Preparedness	West Point		
36	Sacchetti	Aron	Lieutenant Colonel	DMNA		
37	Hallman	Hans	Sr. Admin. Asst.	DHSES		
38	Seibert	Chuck	REP PLANNING	DHSES - CEM		
39	Fish	John	Director, Radiological Control	KAPL - G1911		
40	Fisch	Ted	DPPR IV	DHSES		
41	Wachna	Gary	Rep Planner	NYS DCH		
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CONTACT INFORMATION

REDACTED






Entergy  
Nuclear Power  
We Power Life

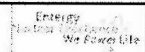
# BWR Decommissioning

James D. Jones  
Manager Emergency Planning  
Entergy JA Fitzpatrick Nuclear Plant

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Entergy




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Nuclear Power  
We Power Life

## Purpose

- Provide an overview of the decommissioning process for a Boiling Water Reactor (BWR)

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## Discussion points

- Review of decommissioning methods
- SAFSTOR strategy and timeline
- SAFTSOR emergency planning considerations
  - Accident mechanisms
  - Consequences
- Questions

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## Allowable Decommissioning Methods

### ➤ DECON

- The equipment, structures, and portions of the facility and site that contain radioactive contaminants are removed or decontaminated to a level that permits termination of the license after cessation of operations.

### ➤ SAFSTOR

- The facility is placed in a safe, stable condition and maintained in that state until it is subsequently decontaminated and dismantled to levels that permit license termination. During SAFSTOR, a facility is left intact, but the fuel has been removed from the reactor vessel and radioactive liquids have been drained from systems and components and then processed. Radioactive decay occurs during the SAFSTOR period, thus reducing the levels of radioactivity in and on the material and, potentially, the quantity of material that must be disposed of during decontamination and dismantlement.

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Nuclear Operations  
We Power Life



Let's discuss the SAFSTOR method

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Nuclear  
We Power Life

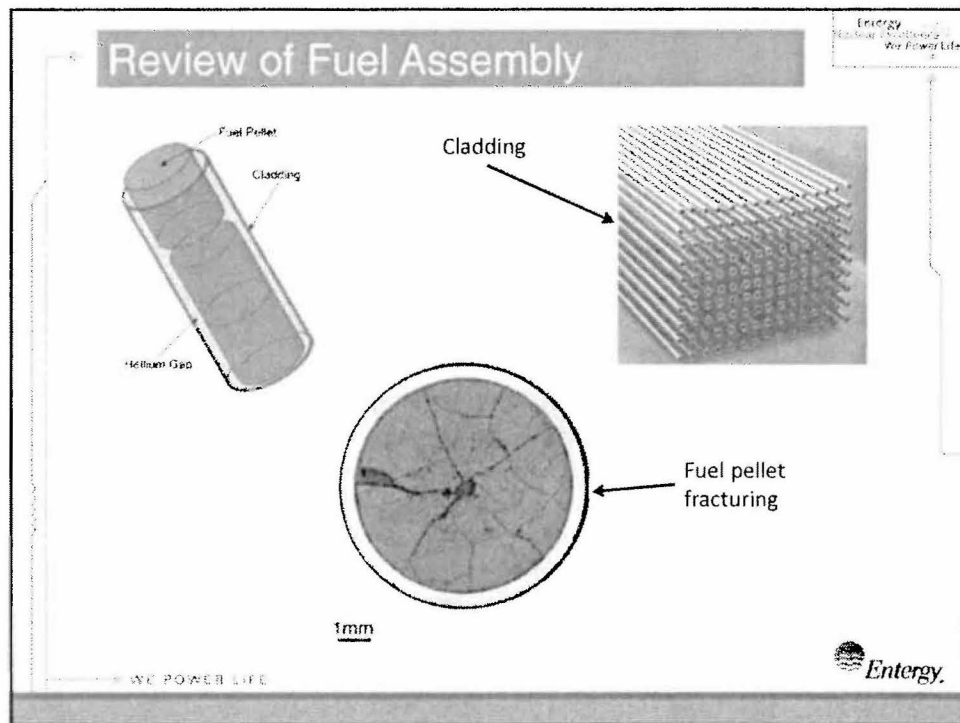


## SAFSTOR Strategy

- A nuclear power plant is similar to other large industrial sites
  - Multiple single purpose buildings
  - Potential for hazardous waste
  - Uniquely, radiological materials are present
    - Nuclear fuel (Fuel)
    - Contamination and neutron-activated components in the reactor and connected structures
      - Reactor vessel and internals
      - Pipes, pumps, valves, tanks
      - Turbine (BWR)

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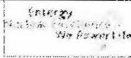


## SAFSTOR Strategy


- **SAFTOR strategy for Fuel**
  - Move Fuel from the Reactor Pressure Vessel to the Spent Fuel Pool (SFP)
    - This Fuel is still capable of generating significant decay heat for several months
    - Fuel cladding is still a Fission Product Barrier and must be protected (i.e., cooled)
    - Time will allow the radioactivity to decay to the point where the Fuel can be placed into Dry Cask Storage

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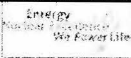
**SAFSTOR Strategy**

  
Entergy  
Nuclear Power  
We Power Life


- **SAFTOR strategy for Fuel**
  - Move Fuel from the Reactor Pressure Vessel to the Spent Fuel Pool (SFP)
    - Protection of the Fuel in the SFP requires that
      - SFP water level be maintained
      - The heat transferred from the Fuel to the SFP water is removed

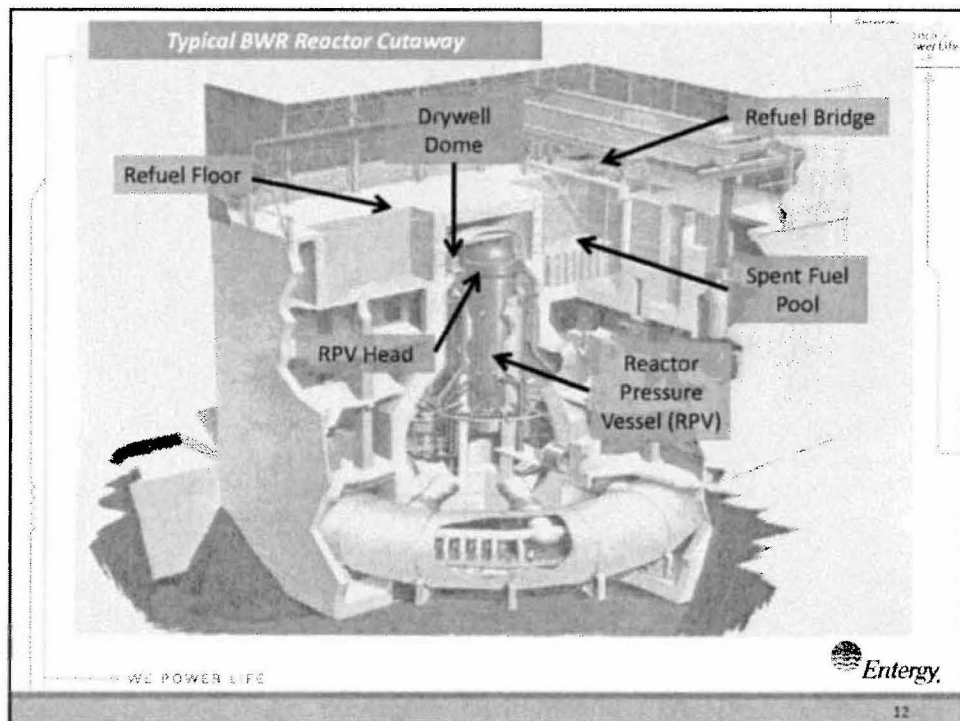
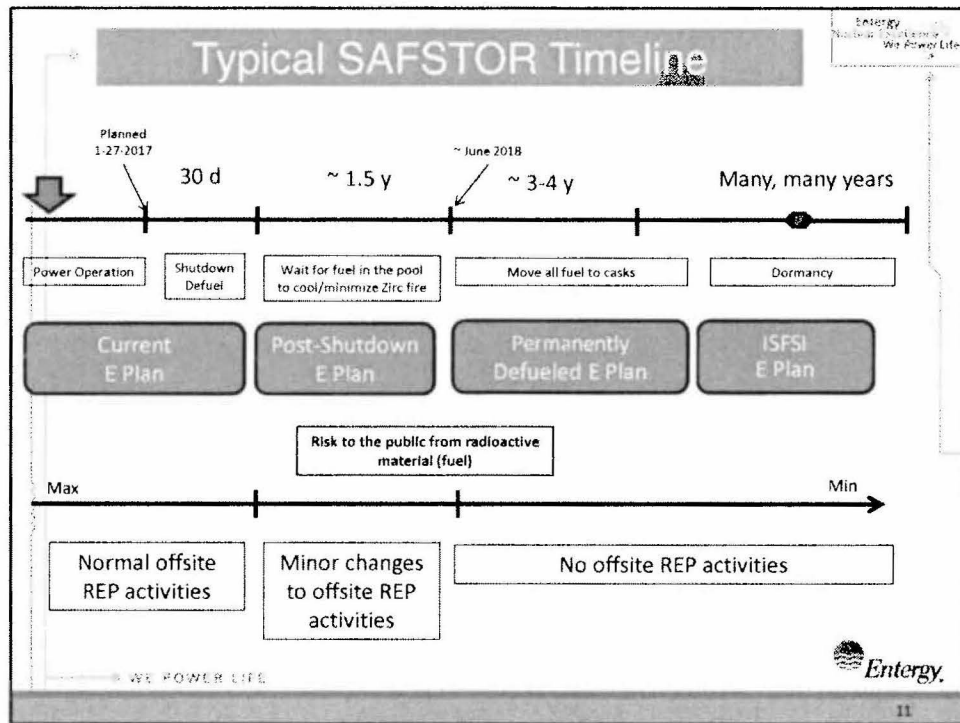
  
Entergy  
WE POWER LIFE

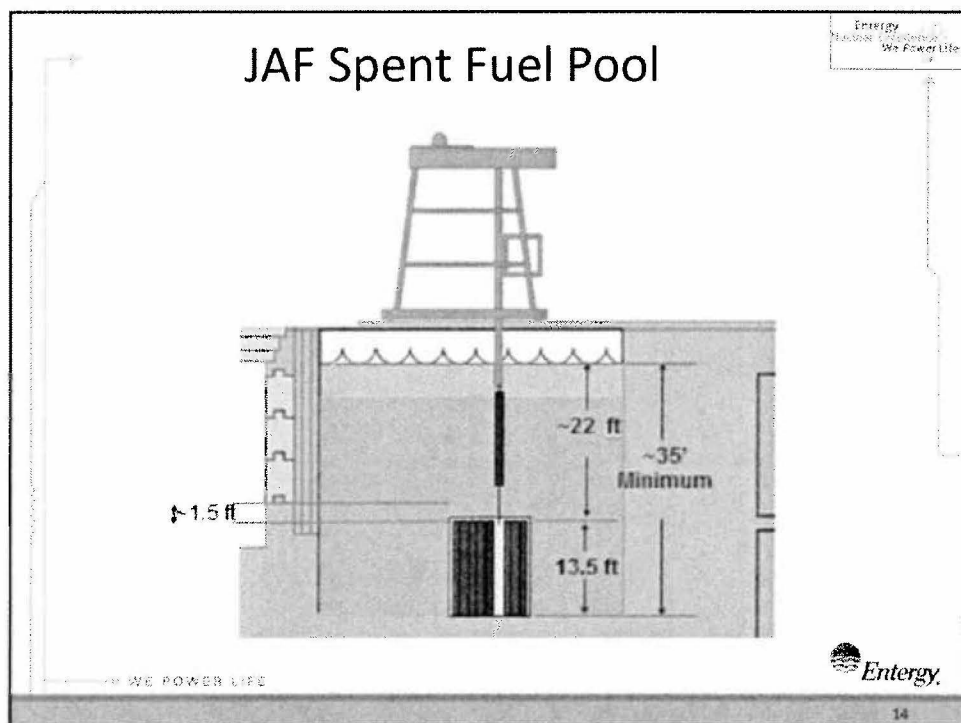
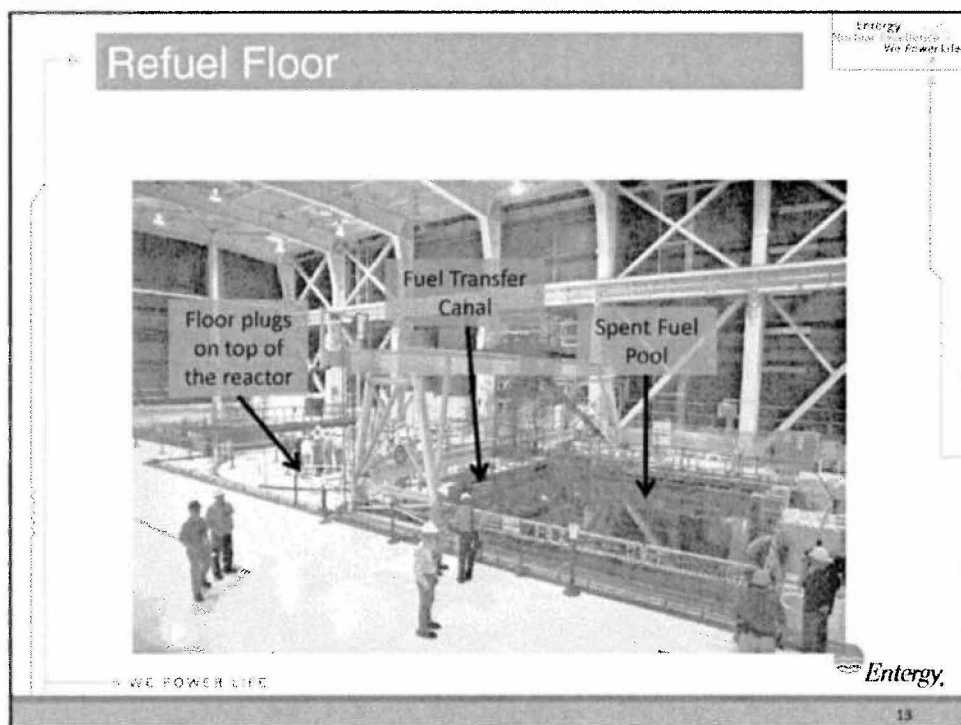
**SAFSTOR Strategy**

  
Entergy  
Nuclear Power  
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- **SAFSTOR strategy for contamination and neutron-activated components**
  - Drain fluid from systems and allow time for radioactive decay to reduce the hazard of dismantling and disposing of radioactive components
  - Dismantling and disposing of components

  
Entergy  
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## ISFSI Cask Being Lowered into JAF Spent Fuel Pool

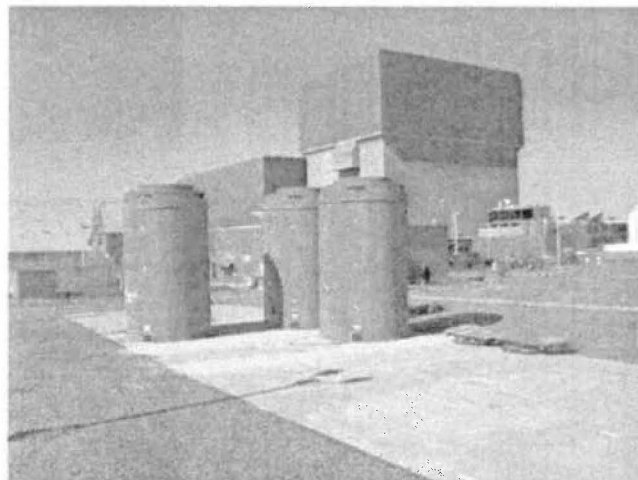


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15

## ISFSI\* Pad and Dry Storage Casks



\* Independent Spent Fuel Storage Installation



16



## SAFSTOR Emergency Planning Considerations

- A plant whose Fuel is wholly contained in the SFP can still experience a range of incidents that can cause an emergency and affect the public
  - Fires, earthquakes, explosions
  - Security events
  - System or component failures
  - Loss of electrical power
- However, its all about the Fuel

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## SAFSTOR Emergency Planning Considerations

- It's all about the Fuel
  - If it's not properly cooled in the SFP, fuel damage can occur
    - Fuel rods can heat, burst the cladding and result in a "gap release"
    - Fuel rods can heat, oxidize and start a "zirconium fire" resulting in release of radioactive material to the atmosphere
  - Only events that threaten the Fuel can lead to an emergency that have the potential to affect the public

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### SAFSTOR Emergency Planning Considerations

- Gap release from Fuel in SFP
  - Typically limited to Noble gases
- Zirconium fire releases
  - Gap release, plus
  - Particulate release

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### SAFSTOR Emergency Planning Considerations

- How to damage Fuel in the SFP
  - SFP drain down
    - Loss of makeup
    - Hole in the SFP
    - Inadvertent siphoning
  - SFP Loss of heat removal
    - Loss of SFP water
    - Loss of electrical power (= loss of pumps and heat exchangers)
    - Loss of heat sink

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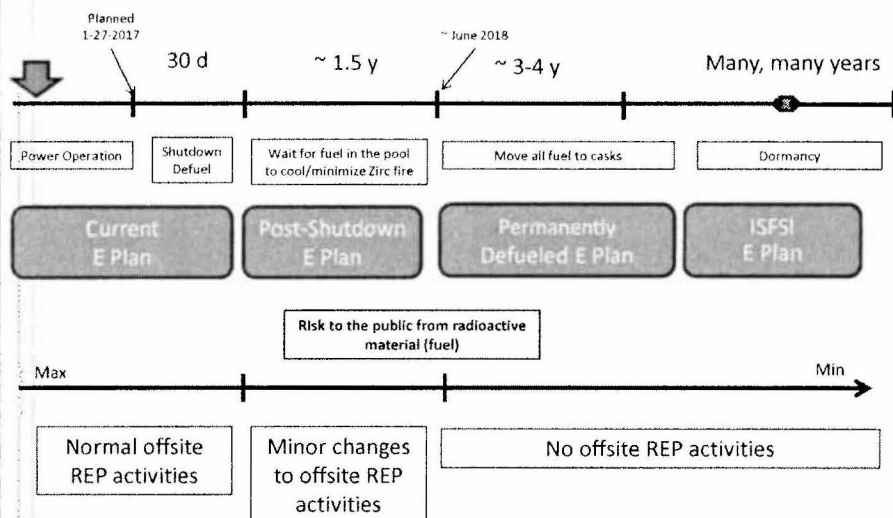


## SAFSTOR Emergency Planning Considerations

- Rad releases from SFP accidents MAY exceed Protective Action Guidelines outside the site boundary, and are dependent on
  - Source term
  - Age of fuel in the SFP
  - Pathway of radioactive materials
    - Filtered or not
    - Elevated or ground
    - Dilution



## Review: Typical SAFSTOR Timeline



## Questions?

Jim Jones  
Entergy JA FitzPatrick  
315-349-6030

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**JAFP-16-0113**

**Enclosure 2**

**Correspondence Documenting Concurrence with the Proposed  
Changes**

**(5 Pages)**

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**From:** Currier, Dale [<mailto:dcurrier@oswegocounty.com>]  
**Sent:** Thursday, June 23, 2016 4:01 PM  
**To:** Jones, James D  
**Subject:** Re: Request from JAF

Mr. Jones,

Thank you for forwarding this information and request to me for review and evaluation. Entergy James A. FitzPatrick (JAF) continues to provide Oswego County Emergency Management with updated information regarding their planned cessation of operations scheduled for January 27, 2017. The provided documentation regarding potential effects of your operations on local response organizations has been very complete and timely. Specifically, with respect to any potential impacts on the Offsite Response Organizations (OROs) with respect to the elimination of ERDS in support of offsite radiological assessment and protective action decision-making, we find no potential impacts.

Please let me know if you require any further information.

Dale A. Currier, CEM  
Director

On Thu, Jun 23, 2016 at 2:38 PM, Jones, James D <[jjone36@entergy.com](mailto:jjone36@entergy.com)> wrote:

Hi Dale,

Entergy James A. FitzPatrick (JAF) continues to take actions toward permanent cessation of operations planned for January 27, 2017. As you are aware, in February 2016, we submitted a license amendment request (LAR) for Nuclear Regulatory Commission (NRC) approval of a Post-Shutdown Emergency Plan. As part of the NRC's review of the JAF Post-Shutdown Emergency Plan, which we expect to implement in January 2017, the NRC has requested that we provide documentation that affected State and local response organizations have performed a review of the proposed changes to the JAF Emergency Plan and that potential impacts do not exist with respect to the elimination of ERDS in support of offsite radiological assessment and protective action decision-making.

We request that Oswego County provide a response to JAF confirming that you have performed a review of the proposed changes to the JAF Emergency Plan and that potential impacts do not exist with respect to the elimination of ERDS in support of offsite radiological assessment and protective action decision-making. For your convenience, we are providing you with an electronic copy of the draft Post-Shutdown Emergency Plan and the License Amendment Request we submitted to the NRC. We would appreciate a response to this letter July 14, 2016.

Should you have any questions on the assessment, please call me at [315-349-6030](tel:315-349-6030) to discuss.

We appreciate your input to the assessment and the continued excellent cooperation of the Oswego County Office of Emergency Management.

**James D. Jones**

Manager, Emergency Planning

J.A. FitzPatrick Nuclear Plant

Lycoming, New York 13093

[315-349-6030](tel:315-349-6030) (office)

[315-243-6232](tel:315-243-6232) (mobile)

---

**From:** Currier, Dale [<mailto:dcurrier@oswegocounty.com>]  
**Sent:** Monday, June 20, 2016 11:36 AM  
**To:** Jones, James D  
**Subject:** Re: Request from JAF

Mr. Jones, Sorry for the hold-up. Dealing with issues related to Scott and Sara leaving has become more complicated every day.

Here is Oswego County EMO's official response. Please let me know if you need this mailed to you on letterhead.  
DAC

Oswego County confirms it (a) has reviewed the proposed changes to the JAF emergency plan and (b) concurs with Entergy's assessment that potential impacts on the State's ability to implement its FEMA-approved REP plan do not exist.

JAF emergency Planning personnel, particularly Jim Jones, have been very helpful and forthright in explaining the shutdown and closure process to the entire County emergency management office staff.

Sincerely,

Dale A. Currier, CEM

On Mon, Jun 20, 2016 at 10:12 AM, Jones, James D <[jjone36@entergy.com](mailto:jjone36@entergy.com)> wrote:

Dale,

May I ask for an update on this?

**James D. Jones**

Manager, Emergency Planning

J.A. FitzPatrick Nuclear Plant

Lycoming, New York 13093

315-349-6030 (office)

315-243-6232 (mobile)



**From:** Jones, James D

**Sent:** Wednesday, June 01, 2016 7:08 AM

**To:** [dcurrier@oswegocounty.com](mailto:dcurrier@oswegocounty.com)

**Cc:** Peter, Timothy C.; Adner, Chris; Couture III, Philip; Cullinan, Peter; Raimo, Susan; Holden, Tammy; Fernandez, Joanne

**Subject:** Request from JAF

Hi Dale,

Entergy James A. FitzPatrick (JAF) continues to take actions toward permanent cessation of operations planned for January 27, 2017. At our Partner meeting in Fulton on February 8, 2016, we explained the effect of these actions on the JAF emergency plan as well as the impact on the emergency plans of our offsite stakeholders. As you are aware, in February 2016, we submitted a license amendment request (LAR) for Nuclear Regulatory Commission (NRC) approval of a Post-Shutdown Emergency Plan. As part of the NRC's review of the JAF Post-Shutdown Emergency Plan, which we expect to implement after shutdown in January 2017, the NRC has requested that we inform the NRC whether our Radiological Emergency Preparedness (REP) partners have had an opportunity to review the proposed changes to the emergency plan as well as assess the potential impacts on their ability to effectively implement their Federal Emergency Management Agency (FEMA)-approved REP plans. As stated in the LAR, JAF concluded that such impacts do not exist, because no tasks that require interfacing with State and local response organizations are proposed for elimination, nor are there any proposed changes to the offsite REP requirements.

We request that Oswego County provide a response to JAF confirming that it (a) has reviewed the proposed changes to the JAF emergency plan and (b) concurs with our assessment that potential impacts on the State's ability to implement its FEMA-approved REP plan do not exist. For your convenience, we are providing you with an electronic copy of the draft Post-Shutdown Emergency Plan and the License Amendment Request we submitted to the NRC. We would appreciate a response to this letter by June 17, 2016.

Should you have any questions on the assessment, please call me at [315-349-6030](tel:315-349-6030) to discuss.

We appreciate your input to the assessment and the continued excellent cooperation of the Oswego County Office of Emergency Management.

**James D. Jones**

Manager, Emergency Planning

J.A. FitzPatrick Nuclear Plant

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