



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 27, 2016

MEMORANDUM TO: Jane Marshall, Director
Division of License Renewal
Office of Nuclear Reactor Regulation

FROM: Yaira K. Diaz-Sanabria, Chief **/RA/**
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

SUBJECT: COMMUNICATIONS PLAN REGARDING THE RENEWAL OF THE
GRAND GULF NUCLEAR STATION, UNIT 1, OPERATING LICENSE

The enclosed plan describes the key messages regarding the renewal of the operating license for Grand Gulf Nuclear Station, Unit 1, and the staff's plans to communicate associated information. Implementation of this plan will contribute to efficiencies in our strategic performance goal of ensuring openness in our regulatory process. This plan will facilitate communication within the agency to enable the staff to provide timely, consistent, and understandable information to external stakeholders.

Docket No. 50-416

Enclosure:
As stated

CONTACT: Emmanuel Sayoc, NRR/DLR/RPB1
301-415-4084

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*Concurred via e-mail

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DATE	10/20/16	10/21/16	10/24/16	10/27/16

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Memorandum to C. Miller from Y. Diaz-Sanabria, dated October 27, 2016

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NUCLEAR STATION, UNIT 1, OPERATING LICENSE

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COMMUNICATION PLAN REGARDING THE RENEWAL OF THE
GRAND GULF NUCLEAR STATION, UNIT 1 (TAC NO. ME7493)
OPERATING LICENSE

GOALS:

The objective of this plan is to ensure consistent messages and appropriate protocols to be used for the staff activities related to finalizing the renewed license decisions for Entergy Corporation (Entergy), Grand Gulf Nuclear Station, Unit 1 (GGNS). The activities include (but are not limited to) development and scheduling of the license package itself (consisting of a transmittal letter to Entergy, one renewed license text, one Technical Specification including Apps. A, B & C, and the FRN notice text), the 3-day memo to the Commission regarding GGNS renewed licenses; internal memos and associated reviews and concurrence process; issuing the environmental Record of Decision (ROD); and scheduling or progress reporting of internal staff tasks (particularly those tasks that are chiefly internal and pre-decisional—tasks or milestones that are on the public website are not affected by this and remain, of course, public knowledge). This plan includes:

- Background and discussion on Entergy's license renewal application (LRA)
- Key messages to use when communicating with stakeholders on the status of the license decisions
- Communication team, tools, audiences, and other useful information

This communication plan will aid NRC staff in fielding questions about potential issues both within and beyond the scope of the license renewal review.

BACKGROUND:

By letter dated October 28, 2011, Entergy submitted its application to renew the operating license for GGNS. The staff reviewed the license renewal application in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions," and 10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants." Region IV also performed inspections, as described in a memorandum dated July 28, 2016, from Kriss Kennedy, Regional Administrator. The staff documented the results of its safety review in the "Safety Evaluation Report Related to the License Renewal of Grand Gulf Nuclear Station, Unit 1," issued in October 2016. The staff also documented the results of its final environmental review for GGNS in a supplemental environmental impact statement (SEIS) published in November 2014 as NUREG-1437, Supplement 50, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Grand Gulf Nuclear Station, Unit 1." The Advisory Committee of Reactor Safeguards (ACRS) completed its review of the staff's Safety Evaluation Report (SER) and the LRA on October 6, 2016, as a part of its 637th meeting.

This plan addresses the activities associated with issuing decisions on the renewed operating license for GGNS.

ENCLOSURE

KEY MESSAGES:

At this time, the NRC staff is finalizing its license renewal decision for GGNS. The standards for issuing a renewed license are contained in 10 CFR 54.29, "Standards for issuance of a renewed license." Commission policy for issuing a renewed license is clarified in the staff requirements memorandum for SECY-02-0088, "Turkey Point Nuclear Plant, Units 3 and 4, Renewal of Full-Power Operating Licenses," dated June 5, 2002.

- The review of the GGNS portion of the LRA is ongoing at this time. No final decisions have been made for GGNS by the NRC staff. The public timetable for this review is on the NRC website:

<http://www.nrc.gov/reactors/operating/licensing/renewal/applications/gg1.html>.
- The current licensing basis is adequate to protect public health and safety, now and into the period of extended operation.
- The NRC staff has completed a comprehensive safety review for GGNS and determined that the applicant demonstrated that aging effects will be adequately managed to support operation of Unit 1 for 60 years. The ACRS agreed with the staff's finding.
- On September 26, 2016, Entergy informed the NRC that GGNS will not restart from its current forced outage so that operator's performance issues can be addressed. In response to several recent performance issues (two system configuration management issued during the forced outage, and a reactivity management issue from June 2016), senior site and corporate management decided to delay start-up of the plant for one to three months to fully assess operator fundamentals and performance, and implement needed corrective actions. NRC inspectors previously identified weaknesses in operator fundamentals through routine Resident Inspector control room tours, operator licensing inspections, and focused inspections following the June 2016 event. Region IV staff are continuing their ongoing inspection and oversight activities to better understand the causes for the recent events and to evaluate the licensee's response to these performance issues. The NRC will use the results of this evaluation to determine appropriate additional agency actions. The NRC issued a Preliminary Notification of Event or Unusual Occurrence (PNO-IV-16-003; ML16273A330) on September 29, 2016. Additional communications with the public will occur as the NRC progresses through its inspection process. Regional as well as headquarters management have determined that there are no age-related degradation or aging management issues associated with this recent delayed start up and stand down event, and therefore this does not affect license renewal actions.
- The NRC staff also completed an environmental review for GGNS and determined that the environmental impacts of renewing the GGNS operating licenses are not so great that preserving the option of license renewal for energy-planning decisionmakers would be unreasonable.
- On May 4, 2016, the Commission issued a decision, CLI-16-07 (ADAMS Accession No. ML16125A150), in the Indian Point Nuclear Generating Units 2 and 3 (Indian Point) license renewal proceeding stating that documentation was lacking for two inputs

(TIMDEC and CDNFRM) that are part of the severe accident mitigation alternative (SAMA) analysis. The decision stated that uncertainties in these input values could potentially affect the SAMA analysis cost-benefit conclusions and directed the NRC staff to perform additional sensitivity analyses using values specified by the Commission. Based on this Commission decision, the NRC staff determined that additional sensitivity analyses using the values specified by the Commission should also be performed in support of the GGNS SAMA analysis that is provided at Appendix F of the GGNS license renewal FSEIS. In response to an NRC staff request for additional information (ADAMS Accession No. ML16181A112) relating to the Commission decision discussed in the previous paragraph, Entergy performed a SAMA sensitivity analysis for GGNS using the values specified by the Commission (ADAMS Accession No. ML16251A567) and determined that the potential SAMAs, provided in Table E.2-2 of the GGNS Environmental Report (ADAMS Accession No. ML11308A493) did not change. The NRC staff evaluated Entergy's GGNS SAMA sensitivity analysis and concluded that no new SAMA candidates were identified as potentially cost-beneficial based on this additional analysis. Therefore, there are no changes to the conclusions of the NRC staff's GGNS SAMA analysis provided at Appendix F of the GGNS license renewal FSEIS.

- NRC policy is not to comment upon specific details or schedules of pre-decisional materials that may or may not be in process of preparation.

AUDIENCE:

Internal Stakeholders include the Commission and NRC staff up to and including the Executive Director's Office (EDO's) office.

External Stakeholders

- Applicant/Licensee
- GGNS site personnel and the Entergy license renewal team
- Potential Petitioners for Hearing (none known at this time)
- Members of Congress
- Nuclear Industry
- Other Federal, State, local, and Tribal Government Officials
- Public Interest Groups
- General Public
- Media

COMMUNICATION TEAM:

The primary responsibility of the communication team is to ensure that consistent, accurate, and timely messages are properly conveyed to stakeholders. The team consists of technical, project management, Division leadership, and communication staff. The communications team will consult with each other at and across working and management levels, as necessary, based on the complexity of the issues as they arise.

Jane Marshall	301-415-1183	NRR/DLR Director
Benjamin Beasley	301-415-2062	NRR/DLR Deputy Director
Yaira Diaz-Sanabria	301-415-8064	NRR/DLR Branch Chief (Safety)
Kevin Folk	301-415-6944	NRR/DLR Branch Chief (Environmental)
Emmanuel Sayoc	301-415-4084	NRR/DLR Project Manager (Safety)
David Drucker	301-415-6223	NRR/DLR Project Manager (Environmental)
James Kim	301-415-4125	NRR/DORL Project Manager
Greg Warnick	817-200-1144	R-IV/DRP/RPB-C Branch Chief
Rich Smith	817-200-1472	R-IV/RCB Project Manager
Greg Pick	817-200-1270	R-IV/DRS/EB2 Senior Reactor Inspector
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Bill Maier	817-200-1267	Public Affairs, Region IV
B.J. Smith	601-987-6893	State Liaison Officer
Matt Young	601-437-4620	SRI GGNS
Niel Day	601-437-4620	RI GGNS
Beth Mizuno (OGC)	301-415-9201	Senior Attorney

TOOLS:

The focus of the activities in this communication plan is to deliver key messages consistently to internal and external stakeholders without deviation from the NRC's established positions.

External Communications tools for communications during this phase of the project could include the following:

- Conference calls and communications on project status with the applicant
- Issuance of FRNs and press releases for milestones indicated on the Reactor License Renewal public website
- Safety Evaluation Report Related to the License Renewal of Grand Gulf Nuclear Station, Unit 1, October 2016 (ADAMS Accession No. ML16288A185)
- NUREG-1437, Supplement 50, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Grand Gulf Nuclear Station, Unit 1, Final Report" November 2014 (ADAMS Accession No. ML15314A814)
- NUREG-1850, "Frequently Asked Questions on License Renewal of Nuclear Power Reactors," provides standard responses for typical questions regarding license renewal (ADAMS Accession No. ML061110022)
- NRC's License Renewal public website provides key milestone dates and electronic copies of NRC issued documents regarding the review:
<http://www.nrc.gov/reactors/operating/licensing/renewal/applications/gg1.html>

TIME LINES OF RENEWED LICENSE TASKS:

Timelines, actions, and key aspects for the GGNS renewed license are in the following table:

Time Sequence	ACTION	Responsible Organization/ Individual
T – 72 Hours	NRR Dir. Send 3-day Memo to Commission, Notification of License Renewal	HQ - NRR
T = 0 Hour	Renewed license is signed (Est. Oct 19, 2016, 10:00am)	HQ - NRR
T = 0 Hour	Notification email sent to communication team establishing T = 0 Hour time	HQ – RPB1 PM (Emmanuel Sayoc)
T + 0.5 Hour	Send EDO Daily Note to communicate license is signed	HQ – RPB1 BC
T + 0.5 Hours	Communicate key messages to state and local officials	MS – State Liaison
T + 0.5 Hours	Communicate key messages to Congressional offices	HQ – OCA
T + 1.5 Hours	Issue press release regarding Grand Gulf renewed licenses. Respond to future media inquiries – see developed Q&As attached.	HQ – OPA RIV – OPA

Individual messages on desired topics will be developed prior to use as applicable.

QUESTIONS AND ANSWERS (Q&A):

For general Q&A's regarding license renewal, refer to NUREG-1850, "Frequently Asked Questions on License Renewal of Nuclear Power Reactors." Specific Q&A's for each major milestone during the review will be drafted as part of developing Notification Plans.

Who issues a renewed operating license for up to an additional 20 years?

The Director, NRR, issues renewed operating licenses after having made the applicable findings, as authorized by 10 CFR 54.29.

Since GGNS is not a contested plant, the Director, NRR, notifies the Commission in writing three days before issuing the renewed operating licenses.

Is the review of the GGNS license renewal application completed?

The NRC staff is still reviewing the application with respect to GGNS'. No final decisions have been made with regard to renewing the licenses for GGNS as of this time. The timetable for this review schedule is on an NRC public web page:

<http://www.nrc.gov/reactors/operating/licensing/renewal/applications/gg1.html>

What was the result of the staff safety review?

The staff's safety review of GGNS is performed in accordance with 10 CFR Part 54, using guidance in NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants."

The staff found that the applicant had demonstrated that aging effects will be adequately managed to support operation for 60 years without undue risk to the health and safety of the public. The final SER was issued October 2016.

What was the result of the Environmental Review?

The NRC staff's recommendation is that the adverse environmental impacts of GGNS license renewal are not great enough to deny the option of license renewal for energy-planning decision makers. This recommendation was based on the analysis and findings in NUREG-1437, Supplement 50, the environmental report submitted by Entergy in conjunction with the GGNS LRA, consultation with other Federal, State, and local agencies, the staff's own independent review, and the staff's consideration of public comments received.