



**Entergy Nuclear Northeast  
Entergy Nuclear Operations, Inc.**

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**Brian R. Sullivan**  
Site Vice President - JAF

JAFP-16-0168  
November 7, 2016

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: Commitments for March 12, 2012, Information Request Pursuant to 10 CFR 50.54(f) Regarding Recommendation 2.1, Flooding and Seismic

James A FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
License No. DPR-059

- References:
1. NRC letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, ML12053A340, dated March 12, 2012
  2. ENOI letter, Entergy Nuclear Operations Inc., Response to NRC Request for Information (RFI) Pursuant to 10 CFR 50.54(f) Regarding the Flooding Aspects of Recommendations 2.1 and 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, JAFP-12-0063, dated June 8, 2012
  3. ENOI letter, Response to March 12, 2012, Request for Information Enclosure 2, Recommendation 2.1, Flooding, Required Response 1, Integrated Assessment Approach, JAFP-13-0006, dated January 29, 2013
  4. NRC Interim Staff Guidance, Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flooding Hazard Reevaluation; Focused Evaluation and Integrated Assessment, JLD-ISG-2016-01, dated July 11, 2016
  5. NEI report, External Flooding Assessment Guidelines, NEI 16-05 Revision 1, dated June 2016
  6. NRC Interim Staff Guidance, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, JLD-ISG-2012-01 Revision 1, dated January 22, 2016
  7. NEI report, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, NEI 12-06 Revision 2, dated December 2015
  8. ENOI letter, Request for Extension to Comply with March 12, 2012 Commission Orders Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events and Reliable Spent Fuel Pool Instrumentation (Order Numbers EA-12-049 and EA-12-051), JAFP-16-0147, dated September 8, 2016

Dear Sir or Madam:

On March 12, 2012, the NRC issued a letter [Reference 1] entitled, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident. Enclosure 2 of Reference 1 contains requested information for Recommendation 2.1 Flood Hazard Reevaluation. The requested information includes two stages:

- 1) Flood Hazard Reevaluation Report (FHRR) to assess Flood Causes Mechanisms in respect to the current design basis for flooding.
- 2) Integrated Assessment Report, incorporation of changes based on the FHRR.

Stage 1 was completed when FHRR was submitted by JAFP-15-0036 on March 12, 2015. To complete stage 2, JAF committed to submit an Integrated Assessment Report [Reference 2] and, the method and thresholds for performing the Integrated Assessment Report [Reference 3]. The original regulatory commitments to perform an Integrated Assessment Report were caveated by "if necessary."

This letter is being submitted to address the current status of JAF's response to stage 2. The method and thresholds for completing stage 2 of the 50.54(f) request were re-established by the issuance of JLD-ISG-2016-01, Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flooding Hazard Reevaluation; Focused Evaluation and Integrated Assessment [Reference 4]. This interim staff guidance endorses NEI 16-05, External Flooding Assessment Guidelines, Revision 1 [Reference 5]. This document describes the Flooding Impact Assessment Process (FIAP). This process provides methods for demonstrating the adequacy of the existing plant design and mitigating strategies for responding to the reevaluated flooding hazards that exceed a facility's design basis flood level.

The Attachment to this letter summarizes the cancellation of existing commitments made in References 2 and 3, and the creation of a new regulatory commitment to complete a Focused Evaluation and, if necessary, perform an Integrated Assessment per NEI 16-05 revision 1.

Related to Recommendation 2.1, the NRC released JLD-ISG-2012-01 Revision 1 [Reference 6] on January 22, 2016, which endorsed NEI 12-06 Revision 2, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide [Reference 7]. The approach described in NEI 12-06, Revision 2, provides for the performance of mitigating strategies assessments (MSA) under the reevaluated seismic and flooding hazards developed in response to Reference 1. The Attachment to this letter creates two new regulatory commitments to perform a Flooding MSA and a Seismic MSA in accordance with NEI 12-06 Revision 2.

The due dates for the completion of each new regulatory commitment is based on Reference 8 submitted on September 8, 2016, Request for Extension to Comply with March 12, 2012 Commission Orders Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events and Reliable Spent Fuel Pool Instrumentation (Order Numbers EA-12-049 and EA-12-051).

Should you have any questions regarding this letter, please contact William C. Drews, at 315-349-6562.

Sincerely,

A handwritten signature in black ink, appearing to read 'BRS', followed by a horizontal line.

Brian R. Sullivan  
Site Vice President

BRS/WCD/mh

Attachment: Regulatory Commitments

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

**JAFP-16-0168**

**ATTACHMENT**

**Regulatory Commitments**

**(1 Page)**

### Regulatory Commitments

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

Number	Text	SCHEDULED COMPLETION DATE	
		Original	Revised
Source: JAFP-12-0063 dated June 8, 2012			
18447	An Integrated Assessment report for JAF, if it is necessary, will be submitted two years after the flood evaluation is completed.	March 12, 2017 (if necessary)	Canceled
Source: JAFP-13-0006 dated January 29, 2013			
18477	Entergy commits to use Interim Staff Guidance JLD-ISG-2012-05, Guidance for Performing the Integrated Assessment for External Flooding, Revision 0 guidance as the approach for developing the NTTF 2.1 flooding Integrated Assessment Report for James A. FitzPatrick if the reevaluated flooding hazard is not bounded by the current design basis flooding evaluation.	March 12, 2017 [Upon submittal of the Integrated Assessment Report, if required, which is two years following submittal of the site's Hazard Reevaluation Report.]	Canceled
18478	Entergy commits to using the guidance provided in NRC Letter, D.L. Skeen (NRC) to J.E. Pollock (NEI), Trigger Conditions for Performing and Integrated Assessment and Due Date for Response, regarding the trigger conditions and scope of any required Integrated Assessment.	March 12, 2017 [Upon submittal of the Integrated Assessment Report, if required, which is two years following submittal of the site's Hazard Reevaluation Report.]	Canceled

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
A Focused Evaluation will be performed in accordance with JLD-ISG-2016-01 revision 0 and submitted to the NRC. If necessary, an Integrated Assessment will be performed in accordance with JLD-ISG-2016-01 revision 0 and submitted to the NRC.	X		August 31, 2017
A Flooding Mitigating Strategies Assessment (MSA) will be performed in accordance with JLD-ISG-2012-01 Revision 1 and submitted to the NRC.	X		August 31, 2017
A Seismic Mitigating Strategies Assessment (MSA) will be performed in accordance with JLD-ISG-2012-01 Revision 1 and submitted to the NRC.	X		December 31, 2017