

CIR

From: "ENGLAND, LESLEY A" <LENGLAN@entergy.com>
To: "twa@nrc.gov" <twa@nrc.gov>
Date: 5/25/04 3:53PM
Subject: EAL call

Tom:

Attached is our spread sheet for the Wednesday conference call to understand your draft questions on the EALs. We have the general questions first followed by the questions in NEI EAL number order. How does this line up with your compilation? 'Clarify' means we're not sure what is needed; 'Discuss' means we will briefly state what we plan to do to be sure that will be responsive to the question. It is not our intent to necessarily try to answer the questions during the call. Where there is nothing specific noted we should spend minimal necessary time. As I noted earlier, Entergy will call in from 6 locations. Let me know how NRC would like to orchestrate the call. I'm in the office through Thursday this week.

<<EAL NRC Summary Questions.doc>>

Les England
lenglan@entergy.com
internal 8-433-5766
external 601-368-5766
Fax # 601-368-5816

— docket 50-313
— 368
— 416
— 458
— 382
— PM is T. Alexion

CC: "HAYES, CURTLEY C" <CHAYES@entergy.com>

Mail Envelope Properties (40B3A43B.12D : 21 : 57645)

Subject: EAL call
Creation Date: 5/25/04 3:49PM
From: "ENGLAND, LESLEY A" <LENGLAN@entergy.com>
Created By: LENGLAN@entergy.com

Recipients

nrc.gov
owf4_po.OWFN_DO
TWA (Thomas Alexion)

entergy.com
CHAYES CC (HAYES, CURTLEY C)

Post Office	Route
owf4_po.OWFN_DO	nrc.gov entergy.com

Files	Size	Date & Time
MESSAGE	877	05/25/04 03:49PM
Part.001	2845	
EAL NRC Summary Questions.doc		543232
Mime.822	749240	

Options

Expiration Date:	None
Priority:	Standard
Reply Requested:	No
Return Notification:	None
Concealed Subject:	No
Security:	Standard

W3/ANO/RBS/GGNS COMPARISON

GENERAL

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
1	FSAR Table 4-2	GGNS	Specific 1		There appear to be changes to the DBA listing of accidents and associated classifications under the proposed EAL scheme. Provide a description of the review of these accidents to ensure that the classifications are correct as listed.		X	
2	<u>NA</u>	GGNS	1	<u>NA</u>	Referenced changes to the Grand Gulf Emergency Plan, included in the proposed change package, do not include an evaluation and justification for the appropriateness for the proposed changes. It is expected that all changes included in the package contain appropriate detailed evaluations and justifications for changes.		X	Why is 50.54q required?
3	<u>NA</u>	GGNS	2	<u>NA</u>	Referenced changes to the Grand Gulf FSAR, included in the proposed change package, do not include an evaluation and justification for the appropriateness for the proposed changes. As specific examples, old sections of the FSAR are deleted for a replaced section with NEI 99-01 methodology, but no documentation for the review and justification for the change is included. Similarly, Table 4-2 of the FSAR contains minor changes, but documentation of the review of the design bases accidents and corresponding classification levels is not included.		X	
4	<u>NA</u>	GGNS	3	<u>NA</u>	Specific definitions for (difference) and (deviation) do not appear to be consistently applied. Numerous examples, identified below, indicate that areas labeled (differences) appear to be (deviations). It is intended that NEI 99-01 is consistently used by licensees with a high degree of similarity in order to provide an industry-wide similarity in classifications of emergencies. Additionally, the endorsement by NRC in RG 1.101 of NEI 99-01 and the application of the		X	

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action	
					<p>methodology by the industry was intended (by NRC) to be at a high level of similarity. Differences for site-specific applications were identified within NEI 99-01. Any alteration of the initiating conditions, EALs, or basis was permitted, but expected to be identified as a deviation, with detailed evaluation of the alteration and justification to sufficiently support a (stand alone) determination for the change. This was discussed with Entergy and other EAL change packages (for other Entergy plants) were included (but not Grand Gulf, the first Entergy submittal). It is recommended that (differences(and (deviations(be specifically defined within the change package (as was done for the ANO EAL submittal) and followed.</p>				
5	<u>NA</u>	W3	1	<u>NA</u>	<p>In review of other Entergy submittals, an expected level of consistency (format, policy, exposure limits, etc.) does not appear evident. While exact consistency between sites is not a specific requirement for submittal, it was the intent of NEI, and the NRC endorsement of 99-01, that a standard methodology in emergency classification would result. In consideration for making changes as a result of these questions / comments, a common Entergy approach in response may expedite review by the NRC staff.</p>		X	<p>Can this question be removed from list ? Appears to be subjective.</p>	
6	<u>NA</u>	W3	2	<u>NA</u>	<p><i>10 CFR 50, Appendix E -- Section IV.B (Assessment Actions) states, "...emergency action levels shall be discussed and agreed on by the applicant [licensee] and State and local governmental authorities, and approved by NRC." In its submittal cover letter, the licensee states that "[t]hese changes have been reviewed and approved by...the State of Louisiana and local governmental authorities." Please provide documentation indicating that these discussion have</i></p>			<p>W3 will provide evidence of review.</p>	

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					<i>occurred and that there is agreement with State and local governmental authorities on the implementation of the proposed EAL changes based on NEI 99-01, Revision 4.</i>			
7	<u>NA</u>	ANO	1	<u>NA</u>	<i>10 CFR 50, Appendix E -- Section IV.B (Assessment Actions) states, "...emergency action levels shall be discussed and agreed on by the applicant [licensee] and State and local governmental authorities, and approved by NRC." Please provide documentation indicating that these discussion have occurred and that there is agreement with State and local governmental authorities on the implementation of the proposed EAL changes based on NEI 99-01, Revision 4.</i>		X	
8	<u>NA</u>	W3	3	<u>NA</u>	<i>Provide copy of calculations used to determine effluent monitor thresholds under AG1, AS1, AA1 and AU1, and specify any deviations from guidance in NEI 99-01 (Basis for Radiological Effluent Initiating Conditions) and Appendix A. In addition, provide ranges for effluent monitor instrumentation referenced.</i>			<i>W3 will provide additional information.</i>
9	<u>NA</u>	ANO	3	<u>NA</u>	<i>Provide copy of calculations used to determine effluent monitor thresholds under AG1, AS1, AA1 and AU1, and specify any deviations from guidance in Appendix A to NEI 99-01 (Basis for Radiological Effluent Initiating Conditions).</i>			<i>ANO will provide additional information.</i>
10	<u>NA</u>	W3	4	<u>NA</u>	<i>Provide a simplified drawing or schematic illustrating unit auxiliary and start-up transformers and describe inter-relationship regarding conditions needed for a loss of off-site power and the ability of emergency diesel generators to supply on essential busses.</i>			<i>W3 will provide additional information.</i>
11	<u>NA</u>	ANO	4	<u>NA</u>	<i>Provide a simplified drawing or schematic illustrating unit auxiliary and start-up transformers and describe inter-relationship regarding conditions needed for a loss of off-site power and the ability of</i>			<i>ANO will provide additional information.</i>

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					<i>emergency diesel generators to supply on essential busses.</i>			
12	<u>NA</u>	W3	5	<u>NA</u>	<i>Licensee Basis (under CU3) states that "[t]emporary instrumentation and jumpers are maintained in service such that the operators are able to monitor RCS temperature and reactor vessel level...Redundant means of reactor vessel level indication are procedurally installed to assure that the ability to monitor level will not be interrupted." Describe instrument range of RPV water level indication in Modes 5 and 6, specifically ability to monitor level at the top of active fuel and the bottom ID of the RCS loop. In addition, identify any periods during mode transition when indication would not be available. In addition, provide reference to specific procedural requirements for installing temporary instrumentation, and describe means in place to preclude modification of this procedural requirement without concurrent evaluation and revision of EALs.</i>		X	
13	<u>NA</u>	ANO	6	<u>NA</u>	<i>Describe whether temporary RCS water level instrumentation is installed in Modes 5 and 6, and if installed, whether ANO-1 and ANO-2 instrumentation capabilities in Modes 5 and 6 would monitor water level at or below the bottom ID of the RCS loop and at the top of active fuel (TOAF) for either unit.</i>		X	
14	<u>NA</u>	W3	6	<u>NA</u>	<i>Evaluate changes proposed to NEI 99-01 guidance in submittal to ensure that any deletions to NEI 99-01 Initiating Condition (IC) statements or example EALs criterion, or significant changes (other than nomenclature, simple terminology or system names, etc.) that may impact intent or thresholds established or guidance provided in NEI 99-01, are listed as deviations. In addition, provide specific technical justification for any deviations, as</i>		X	W3 clarify difference and deviation.

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					<i>appropriate. (Specific examples listed under "Specific Comments".)</i>			
15	<u>NA</u>	ANO	2	<u>NA</u>	<i>Clarify "deviation" example provided in Attachment 4 (ANO NEI EAL Deviations and Differences) to identify <u>any</u> deletions to NEI 99-01 Initiating Condition (IC) statements or example emergency action levels (EALs) criterion, or significant changes (other than nomenclature, simple terminology or system names, etc.) that may impact intent or thresholds established or guidance provided in NEI 99-01. In addition, evaluate changes proposed to NEI 99-01 guidance in submittal, reclassify appropriately as a deviations or differences and provide specific technical justification for any deviations and differences, as appropriate. (Specific examples listed under "Specific Comments".)</i>		X	
16	<u>NA</u>	ANO	3	<u>NA</u>	<i>Discuss application of differences in design between systems, setpoints, instrumentation, etc. on ANO-1 (Babcock & Wilcox) and ANO-2 (Combustion Engineering), as they appropriately apply to EALs. Has any effort been made to coordinate EALs revision for ANO-2 with Entergy's Waterford 3 for consistency in application within Entergy and among Combustion Engineering designs?</i>	X		What is needed?
17	<u>NA</u>	ANO	4	<u>NA</u>	<i>Provide rational for the inconsistent use of unit nomenclature "ANO-1 / ANO-2" versus "Unit 1 / Unit 2", or revise accordingly to ensure consistency in terminology.</i>			ANO will correct documentation.
18	<u>NA</u>	ANO	Spec 1	<u>NA</u>	Section 6.2.1 (Downgrading the Emergency Classification) appears to allow for downgrading regardless of event class severity. Describe how the recommendation in NEI 99-01, Section 3.11 (Emergency Class Downgrading) is being addressed, which states in part that		X	

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					"[a] combination approach involving recovery from General Emergencies and some Site Area Emergencies and termination from NOUEs, Alerts and certain Site Area Emergencies causing no long-term plant damage..."			

ABNORMAL RAD

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
1	<u>AU1 / EAL 1</u> <u>AA1 / EAL 1</u>	W3	1	<u>AU1 EAL1</u> <u>AA1 EAL1</u>	t 4) provides a listing of action monitors. However, listing matrix (Attachment 3) for event . Clarify justification for attachments, or provide listing of action monitors in EAL matrix.			W3 establish list
2	<u>AU1 / EAL 1</u>	RBS	1	AU1 #1	99-01 EAL #1 applies to any effluent monitor. RBS applied #1 only to liquid releases (effluent monitors addressed in #2). Application for contamination in line causing monitor to continue to read high is acceptable. By applying to liquid only, does this disturb the logic for other EALs (see #2)? Explain why credit not applied for samples which correct monitor readings (as in #2 basis)?	X		
3	<u>AU1-EAL 2</u>	ANO	2	<u>AU1 EAL 2</u>	ee inserted the statement "ng a discharge", which is not ssed under NEI 99-01, AU1 - ble EAL 2. However, statement ot used in licensee AA1, EAL 2. ss insertion of statement as deviation or difference under ment 4, and provide justification ange and inconsistency with AA1,			ANO resolve wording
4	<u>AU1 / EAL 2</u> <u>AA1 / EAL 2</u>	W3	4	<u>AU1 / EAL 2</u> <u>AA1 EAL 2</u>	Basis states that "[g]rab sample analysis of the circulation water discharge, IAW EAL#3, would be necessary to determine the appropriate action." Clarify, per NEI 99-01 guidance, that a grab sample is not required to declare an event per AU1 / EAL 2, based on effluent monitor threshold being exceeded for ≥ 60 minutes.		X	

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
5	AU1 / EAL 2	RBS	2	AU1 #2	99-01 EAL #2 applies to radiation monitors, effluent monitors were addressed in #1. Why did you separate liquid from effluent (#1 and #2) monitors? Are there conditions where gaseous effluent Monitors can continue to read following term of releases as in #1? Explain why rad monitors are not included in EALs and why this deviation was not identified.		X	
6	AU1 / EAL 3 AA1 / EAL 3	W3	2	AU1 <u>EAL 3</u> AA1 <u>EAL 3</u>	Provide listing of applicable, site-specific technical specification references for gaseous and liquid releases per NEI 99-01 guidance.			W3 provide list
7	AU1 / EAL 3	RBS	3	AU1 #3	Explain why wording differs from 99-01.			RBS revise wording
8	AU1-EAL 5 / AA1-EAL 5	ANO	3	AU1 (and AA1) <u>EAL 4</u>	Licensee modified NEI 99-01, AU1 / AA1 - Example EAL 5, under AU1 (and AA1), EAL 4 to reflect "RDAC data indicating NUE (Alert)." Identify in EAL 4 the site-specific value, as required under NEI 99-01, AU1 (AA1) - Example EAL 5, for event classification consistent with initiating condition criteria of two times the radiological ODCM limits. In addition, clarify that actual meteorology is used for RDAC calculations per guidance in NEI 99-01, AU1 (AA1) Basis for Example EAL 5.		X	
9	AU1 / EALs 4 and 5 AA1 / EALs 4 and 5	W3	3	AU1 <u>EALs</u> <u>4 and 5</u> AA1 <u>EALs</u>	Basis lists the deletion of EALs 4 and 5 as a difference. While deletion is technically justified, provide further clarification why change does not constitute a deviation, based on the		X	

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
				<u>4 and 5</u>	elimination of specific NEI 99-01 example EAL criteria, or provide change listing deletion as a deviation.			
10	<u>AU1-Basis</u>	ANO	4	<u>AU1 Basis</u>	Licensee under AU1 Basis does not address NEI 99-01, AU1 Basis guidance, which states "...if an ongoing release is detected and the starting time for that release is unknown, the Emergency Director should, in the absence of data to the contrary, assume the release has exceeded 60 minutes." Statement is included under licensee AA1 Basis. Address deletion of Basis statement as either a deviation or difference under Attachment 3, and provide justification for deletion of Basis guidance and how EAL will be interpreted without guidance.			ANO modify wording
11	<u>AU2-EAL 1 / AA2-EAL 2</u>	ANO	5	<u>AU2 EAL 1</u> <u>AA2 EAL 2</u>	Licensee does not address the "fuel transfer canal", which is Identified under NEI 99-01, AU2 - Example EAL 1 and AA2 - Example EAL 2. Identify deletion as either deviation or difference under Attachment 4 and provide justification for change, or provide proposed changes to comply with NEI 99-01 guidance.			ANO clarify terminology
12	<u>AU2-EAL 1 / AA2-EAL 2</u>	RBS	4	AU2	NEI 99-01 IC does not apply X1000 throughout EALs for this IC.			RBS to align with fleet
13	<u>AU2 / EAL 1.a</u>	W3	5	<u>AU2 EAL 1</u>	Address site-specific indication of uncontrolled water level decrease in EAL per NEI 99-01 guidance.		X	W3 does not have fuel pool level indication

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
14	<u>AU2-EAL 1</u>	RBS	5	AU2 #1	This EAL specifically applies to areas around spent fuel. The value of (1000) is not intended to apply here and could result in very high radiation areas. Explain this deviation.			RBS to align with fleet
15	<u>AU2-EAL 2</u>	RBS	6	AU2 #2	This EAL is acceptable except for the omission of "unplanned", but the IC is changed, and is a deviation from 99-01. Explain the omission of this deviation, and why this is not identified. Explain use of valid versus unplanned.			RBS to clarify wording
16	<u>AA1</u>	GGNS	2		Deviation, appears acceptable. Compare to other Entergy EAL submittals.		X	
17	<u>AA1 / EAL 2</u>	W3	6	<u>AA1 Basis</u> <u>EAL 2</u>	Correct inconsistency in instrument number between EAL matrix and Basis for the Fuel Handling Building Exhaust ERGM (e.g., PRM-IRE-3032).			W3 to correct instrument numbering
18	<u>AA1 Basis</u>	W3	7	<u>AA1 Basis</u>	Basis states that [f]or this IC [<i>initiating condition</i>], it is expected that PIG monitors on the release pathway will be over-ranged." Identify the specific monitors in question, and clarify whether designated monitor thresholds will be on-scale. If off-scale, provide further justification for use of designated monitor threshold vs. off-scale high.			W3 identify monitors and designate thresholds
19	<u>AA1 / EAL 1</u>	W3	8	<u>AA1</u> <u>EAL 1</u>	Basis states, "...effluent radiation monitor readings that exceed 200 times the Technical			W3 resolve inconsistency

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
					Specification limit..." This is inconsistent with licensee EAL criterion and NEI 99-01 guidance, which specifies "...effluent radiation monitor readings that exceed 200 times the alarm setpoint established by the radioactivity discharge permit." Provide justification for inconsistency, or provide the proposed change to comply with NEI 99-01 guidance.			
20	<u>AA1 / EAL 1</u> <u>AA1 / EAL 2</u>	RBS	7	AA1 #1 and #2	Same issue as in AU1. #1 addresses liquid only, #2 effluent and not radiation Monitors.		X	
21	<u>AA1 / EAL 3</u>	RBS	8	AA1 #3	Explain difference between use of confirmed versus unplanned. Explain difference in wording, in general.			RBS to modify wording
22	<u>AA2 / EAL 1</u>	W3	9	<u>AA2</u> <u>EAL 1</u>	Provide a correlation between site-specific radiation monitors designated licensee EAL 1 and those listed in NEI 99-01, AA2 / EAL 1. In addition, specifically address the lack of Refuel Bridge Area Radiation Monitor per NEI 99-01 guidance.			W3 to provide correlation.
23	<u>AA2/ EAL 2</u>	GGNS	3		Provide more detailed justification that 80 R/hr is procedurally referenced in 05-S-01-EP-4 as the dose rate limit for unrestricted (normal occupational limits) dose controls. Typically, the limit in this EAL is the dose rate where additional dose authorization is necessary to permit entry into a high radiation area.			W3 has lead (RP to provide fleet value)
24	AA2 / EAL 2	W3	10	AA2	Licensee lists the deletion of			W3 to provide additional

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
				<u>EAL 2</u>	site-specific water level indication as a difference, rather than a deviation. While deletion is technically justified, provide further clarification why change does not constitute a deviation, based on the elimination of specific NEI 99-01 example EAL criteria, or provide change listing deletion as a deviation.			justification.
25	<u>AA2</u>	ANO	6	<u>AA2</u>	Initiating Condition (IC) statement under Index of EALs, contained in Attachment 1 to EAL classification procedure, does not contain statement "outside the reactor vessel", as reflected in NEI 99-01, AA2 and Attachments 2 and 3 of the proposed EAL classification procedure. Provide change to reflect NEI 99-01, AA2 guidance or justify difference from guidance and AA2 IC statement in remainder of procedure.			ANO to provide clarification
26	<u>AA2</u>	W3	11	<u>AA2 Basis</u>	Licensee inserted the qualifier: "...for this IC to apply the event must have radiological consequences - high radiation monitor alarm for this classification to apply." This statement is applicable to EAL 1 only, and not EAL 2 per NEI guidance, which is declared based on the actual or likely uncovering of irradiated fuel outside the reactor vessel. Provide further justification for Basis qualification statement, or provide changes to comply with NEI 99-01, AA2 / EAL 2 guidance.			W3 will modify to match NEI 99-01

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
27	<u>AA2</u>	W3	12	<u>AA2 Basis EAL 2</u>	Licensee inserted the qualifier: "For this event, by definition, the loss of water inventory would have to exceed makeup capacity." This statement may be misleading, since EAL is applicable if irradiated fuel is uncovered, regardless of make-up capacity. For example, sufficient make-up capacity may have been available, but not initiated in a timely manner to prevent the uncovering of irradiated fuel. Provide further clarification of basis qualifying statement. 1.		X	W3 does not have level instrumentation
28	<u>AA2</u>	RBS	10	AA2	Describe Max safe ops values in more detail. Does this apply to equip. or personnel?			W3 has lead (Develop fleet wording)
29	<u>AA3</u>	GGNS	4	<u>AA3 Deviation/ Difference</u>	Typo under difference explanation Look for comparison with other Entergy plants for reference to a site specific level for cavity. Typically, a method is available in refueling outages where level can be monitored, even with alarm capability.		X	GGNS does not have water level instrumentation
30	<u>AA3</u>	RBS	9	AA3	Combining EALs 99-01 AA2 #1 and #2 appears to result in two different conditions being combined and causing deviations in EALs. Explain rationale for 9500 mr/hr before declaring Alert (explanation is in basis, and used distance from TOF for spent fuel). Explain why deviating from #2 by use of AND /OR and not including pool level value.			RBS break out into 2 EALs W3 lead on developing common fleet RP values.

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
31	<u>AA3-EAL 1</u>	ANO	7	<u>AA3 EAL 1</u>	Differences listed in Attachment 4 state that “[f]or EAL #1...of the ANO's EALs, a site-specific list is not provided since the possible plant conditions and configurations are very diverse.” However, the licensee does provide a listing of site-specific areas under AA3-EAL 1, contrary to the statement made in Attachment 4. In addition, the site-specific listing under AA3, EAL 1 in Attachment 2 (EAL Matrix) states “Control Room, TSC...”, while Attachment 3 (EAL Basis) states “Control Room/TSC...”. Clarify the use of a site-specific listing under AA3, EAL 1. Also, clarify the inconsistency between the EAL Matrix and Basis regarding whether the TSC from the Control Room, and whether the TSC is a continuously occupied area as specified in Basis.			ANO provide site specific list
32	<u>AA3 / EAL 1</u>	W3	13	<u>AA3 EAL 1</u>	Licensee deviates from NEI 99-01 guidance by using “radiation survey” vs. site-specific radiation monitor reading. Licensee’s justification is that Control Room radiation monitor is not safety-qualified, and therefore, would be validated by survey. Per NEI 99-01 guidance, the term “VALID” is used in conjunction with radiation monitor to address this contingency. The radiation monitor is used to provide prompt assessment of accident conditions, and considered VALID unless proven otherwise per definition. If radiation monitor is unavailable or		X	

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action	
					determined to be invalid, then the use of direct survey readings would apply under EALs, in lieu of specific radiation monitors. This interpretation is consistent with licensee Basis, which states that “[i]he radiation levels in the EALs for this IC may be identified by a radiation monitor value or direct survey. Revise EAL 1 to address NEI 99-01, AA3 / EAL 1 criterion and inconsistency between proposed EAL 1 and Basis statement. In addition, provide further clarification, if not restored to NEI 99-01 EAL 1 criterion, why change does not constitute a deviation, based on the revision of specific NEI 99-01 example EAL criterion, or provide change listing deletion as a deviation.				
33	<u>AA3 / EAL 1</u>	W3	14	<u>AA3 EAL 1</u>	NEI 99-01, AA3 / EAL 1 requires licensee to identify site-specific areas requiring continuous occupancy to maintain plant safety functions, and specifically references under Basis the Control Room, Radwaste Control Room and Central Alarm Station (CAS). Licensee only addresses the Control Room, and does not reflect changes as deviations from NEI 99-01 EAL 1 criterion. Describe evaluation performed for determining areas requiring continuous occupancy to maintain plant safety functions and basis for elimination of the Radwaste Control Room and CAS from consideration. In addition, provide justification for			W3 identify site specific areas	

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
					any deviations from NEI 99-01, AA3 / EAL 1 guidance.			
34	<u>AA3-EAL 2</u>	ANO	8	<u>AA3 EAL 2</u>	Licensee states in Attachment 4 that “[f]or EAL...#2 of the ANO’s EALs, a site-specific list is not provided since the possible plant conditions and configurations are very diverse.” However, the licensee states in Basis (last paragraph) that “[a]pplicable areas requiring infrequent access are identified in the site’s Abnormal Operating Procedures, Emergency Operating Procedures, the 10 CFR 50 Appendix R analysis, and/or analyses performed in response to Section 2.1.6b of NUREG-0578...” Provide further justification why the referenced documents cannot be used to identify areas containing safe shutdown equipment, or proposed changes to comply with NEI 99-01 guidance.			ANO to provide site specific list
35	<u>AA3 / EAL 2</u>	W3	15	<u>AA3 EAL 2</u>	<i>Licensee has expanded EAL 2 criteria to add qualifier: “and access is required for safe plant operation, but is impeded due to radiation dose rates.” As revised, criteria establishes that dose exceeds 20 R/hr and access is impeded due to an undefined radiation dose rate. Clarify EAL 2 criteria to specifically address that reaching > 20 R/hr in areas requiring access, per Basis guidance, is threshold for impeding area access, and provide justification for any deviations from NEI 99-01, AA3</i>			W3 has lead to determine fleet value.

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
					<i>/ EAL 2 guidance. In addition, do common Entergy radiation protection procedures exist that would provide for a consistent dose rate threshold among Entergy plants?</i>			
36	<u>AA3-EAL 2</u>	ANO	10	<u>AA3 EAL 2</u>	<i>Licensee inserted the qualifier: "and access is required for safe plant operation, but is impeded due to radiation dose rates", which is not part of criterion in NEI 99-01 AA3 - Example EAL 2. Identify change as a deviation or difference under Attachment 3, and provide justification for proposed change based on NEI 99-01 example EAL criterion and basis.</i>			W3 has lead to determine fleet value.
37	<u>AA3-EAL 2</u>	ANO	9	<u>AA3 EAL 2</u>	<i>Licensee specifies a threshold of 5000 mR/hr. Describe whether the station's normal occupational exposure guidelines and limits would impede (delay) access to areas, i.e., the need for administrative approvals and briefings prior to entry, as discussed in NEI 99-01, AA3 Basis. If so, provide further justification or proposed change to dose rate threshold that would ensure unimpeded access during an emergency.</i>			W3 has lead to determine fleet value.
38	<u>AS1</u>	GGNS	5	AS1 Dev/Diff document	<i>Provide additional discussion on the deviation (correctly listed) for not listing default monitor set points for NEI 99-01 AS1. Other Entergy plants have included (ex. River Bend) monitor readings. Additional discussion to justify the provision for prompt dose</i>			GGNS to provide list of monitors.

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
					<p>assessment in the control room (in less than 15 minutes) and the procedural/commitment related hooks in place to prevent this capability from being removed in the future are not discussed.</p> <p>Specifically discuss the locations where dose asmt. Computers are located, which have back up battery power or EDG backup power.</p> <p>In AS1 EALs #1 and #2, explain the deviation from the NEI 99-01 AS1 IC reference to Afor more than 1 hour@.</p>			
39	<u>AS1</u> <u>AG1</u>	W3	16	<u>AS1</u> <u>AG1</u>	<p>In NEI EAL Differences Document, under General Comments, the licensee states that "...the Emergency Plan Exclusion Area Boundary is the site boundary." However, the term Exclusion Area Boundary is not defined for user reference in EAL matrix or EAL Basis definitions. Define term "Exclusion Area Boundary" in EAL AG1/AS1 Bases or under Definitions consistent with that provided under General Comments in the NEI EAL Differences Document.</p>			W3 add definition
40	<u>AS1 / EALs 2 and 4</u> <u>AG1 / EALs 2 and 4</u>	W3	17	<u>AS1</u> <u>EALs</u> <u>2 and 3</u> <u>AG1</u> <u>EALs</u> <u>2 and 3</u>	<p>Licensee proposes to consolidate dose assessment and filed survey data EAL criteria under a common EAL for TEDE (whole body) and thyroid CDE. However, while identifying the threshold dose at or beyond the site boundary, the proposed AS1 / EALs 2 and</p>		X	NEI wording is confusing

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
					3 do not address specific NEI 99-01 EAL criteria for interpreting field survey data. NEI 99-01 EAL 4 criteria states that “[f]ield survey results indicate <i>closed window dose rates</i> exceeding 100 mR/hr <i>expected to continue for more than one hour</i> , or analysis of field survey samples indicate thyroid CDE of 500 mR <i>for one hour of inhalation</i> , at or beyond the site boundary.” Provide further justification for the deletion of criteria from EAL statements, or provide change to comply with NEI 99-01 guidance.			
41	<u>AS1 / EALs 2</u>	RBS	11	AS1 #2	Explain deviation for using dose/hr values versus the 99-01 total dose criteria.			RBS eliminate table and place values within EALs
42	<u>AS1 Basis and Appendix A</u> <u>AG1 Basis and Appendix A</u>	W3	18	<u>AS1 Basis</u> <u>AG1 Basis</u>	NEI 99-01 AS1/AG1 Bases guidance states that the meteorology and source term used should be the same as those used for determining the monitor reading EALs in ICs AU1 and AA1. However, the licensee's Basis states that a methodology consistent with AU1 and AA1 was not used for AS1/AG1. Rather, licensee appears to determine AS1/AG1 thresholds based on a ratio from AU1 dose rates. NEI 99-01 Basis and Appendix A state that thresholds for AU1 and AA1 are developed using ODCM methodology, and AS1 and AG1 using dose assessment method. Provide calculations for AS1 EAL 1 monitor readings based on			W3 to modify wording.

	NEI 99-01	Site	Number	Site EAL Number		NRC Clarify	Discuss	Entergy Action
					meteorology and source term used in AU1 and AA1 using station dose assessment model, versus ODCM calculational methodology, for comparison with proposed licensee AS1/AG1 EAL monitor readings. In addition, provide justification under NEI EAL Differences Document for deviation from NEI 99-01 guidance.			
43	<u>AG1</u>	GGNS	6	AG1 Dev/Diff document	Under NEI 99-01, example typo (100 mR/hr),. Same as AS1 EALs #1 and #2, explain the deviation from the NEI 99-01 AS1 IC reference to A for more than 1 hour@.		X	GGNS correct typo
44	<u>AG1 EAL 2</u>	RBS	12	AG1 #2	Explain use of dose/hr values for field team readings, which may be higher than total dose values.		X	

SYSTEM MALFUNTONS

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
1	<u>CU1 EAL 1</u>	RBS	13	CU1#1	In deviation justification, explain relevance on 9.7 in. in relation to vessel level.			RBS provide more justification in basis.
2	<u>CU2</u>	ANO	11	CU2	<i>Licensee IC statement in Attachment 4) is inconsistent with that listed in Attachment 1 (Index of EALs), Attachment 2 (EAL Matrix) and under NEI 99-01 CU2. Correct inconsistency between IC statements.</i>			ANO to correct inconsistency
3	<u>CU2</u>	W3	19	<u>CU1</u>	<i>Initiating condition (IC) title under NEI EAL Differences Document does not reflect IC statement reflected under NEI 99-01 CU2. Provide justification for difference, or provide change to comply with NEI 99-01 IC statement wording.</i>			W3 to correct inconsistency
4	<u>CU2 EAL 2</u>	RBS	14	CU2 #2	Why reverse order of EALs?			RBS will reverse EALs to match NEI 99-01
5	<u>CU1 and CU2</u> <u>CA1 and CA2</u> <u>CS1 and CS1</u>	W3	20	<u>CU1</u> <u>CA1</u> <u>CS1</u>	Provide further technical justification for proposed modification to Mode 6 applicability by adding qualifier "with reactor vessel water level below the reactor vessel flange," which deviates from NEI 99-01 mode definitions, criteria guidance. 2.			W3 will revise to match NEI 99-01
6	<u>CU2-EAL 2</u>	ANO	12	<u>CU2</u> <u>EAL 1</u>	Licensee states "UNPLANNED RCS level drop below the reactor vessel flange greater than 15 minutes," rather than NEI 99-01, CU2 - Example EAL 1 criterion of " <i>[greater than or equal to] ≥ 15 minutes.</i> " Provide justification for deviation, or proposed changes to comply with NEI 99-01 guidance.			ANO to change to match NEI 99-01
7	<u>CU3-EAL 1</u> <u>CU3-EAL 1</u>	ANO	13	<u>CU3</u> <u>EAL 1</u> <u>SU1</u> <u>EAL 1</u>	NEI 99-01 IC statements and Example EALs for both CU3 and SU1, with the exception of mode applicability, are identical. However, listing of offsite power sources and criteria use for threshold 1.b, "At least (site-specific) emergency generators are supplying power to emergency busses," are inconsistent			ANO to eliminate inconsistency

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					between licensee CU3 and SU1, EAL 1. Provide justification for inconsistencies between criteria in CU3 and SU1 based on common NEI 99-01 guidance, or proposed changes to eliminate inconsistency.			
8	<u>CU3</u>	ANO	14	<u>CU3</u>	Licensee has chosen to make IC applicable for modes 5 (Cold Shutdown), 6 (Refueling) and D (Defueled). NEI 99-01 CU3 guidance lists applicability to Cold Shutdown and Refueling only. Basis merely states that licensee chose to add Defueling to mode applicability. Provide technical justification for deviation regarding applicability to Defueled mode, or proposed change to comply with NEI 99-01 guidance.			ANO to modify to comply with NEI 99-01.
9	CU3 EAL1	RBS	15	CU4 #1	Explain why condition of EDGs is not included. Discussion says "implied that EDGs are operable" but not in EAL. Recommend including as in 99-01. Difference does not appear to be correct in logic on loss of EDGs as well as offsite power. (Implies that UE for 15 min. then higher classification, which is incorrect.)		X	
10	<u>CU4-EAL 1</u> <u>CA4-EALs 1, 2 & 3</u>	ANO	15	<u>CU4 EAL 1</u> <u>CA4 EALs 1, 2 & 3</u>	<i>Licensee has chosen to insert "200°F", in lieu of NEI 99-01 guidance statement of "Technical Specification cold shutdown limit." Per guidance established by licensee, this difference should be listed and justified as equivalent to the Technical Specification cold shutdown limit in Attachment 4. Identify difference, and provide justification as equivalent to the Technical Specification cold shutdown limit per NEI 99-01 guidance.</i>		X	
11	<u>CU4 / EAL 1</u> <u>CA4 / EALs 1,2 and 3)</u>	W3	21	<u>CU3 EAL 1</u> <u>CA3 / EALs 1, 2 and 3</u>	<i>Licensee has chosen to insert "200°F", in lieu of NEI 99-01 guidance statement of "Technical Specification cold shutdown limit." Per guidance established by licensee, this difference should be listed</i>		X	

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					<i>and justified as equivalent to the Technical Specification cold shutdown limit. Please identify difference, and provide justification as equivalent to the Technical Specification cold shutdown limit per NEI 99-01 guidance.</i>			
12	<u>CU5-EAL 1</u> <u>SU4-EAL 1</u>	ANO	16	<u>CU5</u> <u>SU4</u>	Licensee states that "ANO uses the letdown radiation monitor (if available) as a qualitative measure of potential fuel clad degradation", but does not provide monitor per NEI 99-01, CU5 - EAL 1. Provide the alarm setpoint(s) for the letdown radiation monitor in ANO-1 and ANO-2, and describe how the setpoint(s) correlate to Technical Specification allowable limits. If alarm setpoint does correspond to Technical Specification allowable limits, provide further technical justification for deviation from NEI 99-01 guidance.			ANO to provide alarm set point
13	<u>CU5-EAL 1</u>	RBS	16	CU5 #1	Explain why RBS does not provide a consistent method for detecting this IC, similar to other Entergy plants (such as GG use of offgas monitor readings resulting in isolation). Further justification for deviating from this EAL is necessary.		X	
14	<u>CU5 / EAL 1</u> <u>SU4 / EAL 1</u>	W3	22	<u>CU4</u> <u>SU9</u>	Clarify whether letdown monitor is currently disabled, and identify whether other radiation monitors would be available to monitor fuel clad degradation based on Technical Specification allowable limits. In addition, provide justification for identifying elimination of radiation monitor criterion as a difference versus a deviation, since proposed change eliminates a specific EAL criterion listed in NEI 99-01 guidance.		X	
15	<u>CU5 / EAL 2</u>	RBS	17		Explain why RBS does not provide a consistent method for detecting this IC, similar to other Entergy plants (such as GG use of offgas monitor readings		X	

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					resulting in isolation). Further justification for deviating from this EAL is necessary.			
16	<u>CU6-EAL 2</u> <u>SU6-EAL 2</u>	ANO	17	<u>CU6 Table C2</u> <u>SU6 Table M2</u>	Licensee includes the Station Radio System under offsite communications capability. Clarify whether implementing procedures address the use of the Station Radio System as a means of offsite notification purpose for consideration under these EALs.			ANO clarify
17	<u>CU6 / EALs 1 & 2</u> <u>SU6 / EALs 1 & 2</u>	W3	23	<u>CU5 Tables C1 & C2</u> <u>SU8 Tables M1 & M2</u>	Licensee includes cellular telephones under onsite and offsite communications capability. Clarify whether implementing procedures address the use of cellular phones as a means of offsite communications for consideration under these EALs, and that cellular phones will function effectively within or in close proximity to plant structures to be considered a means of onsite and/or offsite communications.			W3 clarify
18	<u>CU6-EALs 1 & 2</u> <u>SU6-EALs 1 & 2</u>	ANO	18	<u>CU6 Tables C1 & C2</u> <u>SU6 Tables M1 & M2</u>	Licensee includes portable cellular telephones under onsite and offsite communications capability. Clarify whether implementing procedures address the use of cellular phones as a means of onsite communications and offsite notification for consideration under these EALs, and that cellular phone will function effectively within or in close proximity to plant structures.			ANO clarify
19	<u>CU6-EALs 1</u>	RBS	19	CU6 #1	**Compare w/ GG, why did GG include mode 3 (typo?)			GGNS will break out cold shutdown EALs
20	<u>CU6 / EAL 2</u> <u>SU6 / EAL 2</u>	W3	24	<u>CU5 Table C2</u> <u>SU8 Table M2</u>	Licensee lists civil defense radios under offsite communications equipment, but NEI 99-01 CU6 Basis lists radio transmissions as an extraordinary means of offsite communications. Clarify whether implementing procedures address the use of civil defense radios as a back-up means of offsite			W3 procedure includes civil defense radios

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					communications.			
21	<u>CU7 / EAL 1</u>	W3	25	<u>CU6</u>	Revise DC voltage indication to reflect nomenclature used to address voltages less than 108 VDC and to reflect that used in SS4 and remainder of EALs (i.e., < 108 VDC vs. "of" 108 VDC).			W3 provide additional information
22	<u>CU6 / EAL 2</u>	RBS	18	CU7 #2	Possible typo: offsite instead of onsite?			RBS resolve
23	CU8	GGNS	11	CU8	Justify the deviation (not difference) for including mode 3 in this IC. Note NEI 99-01 wording, in that fuel clad degradation is not considered a precursor because of the mode 4 or 5 condition, and if in mode 3, different considerations would be present.			GGNS to breakout Shutdown EALs
24	<u>CA1-EAL 1</u> <u>CA2-EAL 1</u> <u>CS1-EAL 1</u> <u>CS2-EAL 1</u>	ANO	19	<u>CA1</u> <u>CA2</u> <u>CS1</u> <u>CS2</u>	Licensee states that NEI 99-01 criterion: "Loss of RCS inventory as indicated by RPV level less than the bottom ID of the RCS loop", was not considered since RVLMS <u>will not</u> monitor level below the bottom ID of the RCS loop. However, CA1 and CA2 Basis discussions state that RCS level indication <u>may be lost</u> below the bottom ID of the RCS loop, rather than is not available. If instrument design may allow for RPV level indication under certain conditions, then provide specific justification why criterion was not addressed, or proposed changes to comply with NEI 99-01 guidance.			ANO to provide additional explanation
25	<u>CA1 and CA2 / EAL 1</u>	W3	26	<u>CA1</u> <u>EAL 1</u>	Licensee Basis states that the Bottom ID of the RCS loop is 11.8 ft. MSL, and that level monitoring systems in Modes 5 and 6 provide indication to 12.0 ft. Provide further technical justification why the conservative use of 12.0 ft MSL or indication off-scale low would not be appropriate, rather than proposed deletion of EAL criterion, since level difference between the Bottom ID of the RCS loop and the lowest indication is only 0.2 ft.			W3 to use NEI 99-01 wording

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
26	<u>CA1 and CA2 / EAL</u>	RBS	20	CA1 #1 and #2	Why is EAL reversed, changes meaning? May be possible to not get sump reading and by EAL, no call. IF this was intentional, then provide justification why deviating from the NEI EAL.			RBS to use NEI 99-01 wording
27	<u>CA1-Basis</u>	ANO	20	<u>CA1</u>	Licensee incorrectly included discussion regarding refueling mode from CA2 Basis in CA1 Basis (3 rd paragraph), rather than discussion on cold shutdown provided in NEI 99-01 CA1 Basis. Licensee Basis also incorrectly references CA2 and CS2 due to this error, and in 1 st paragraph states "a loss of heat removal" versus NEI 99-01 discussion of "a loss of ability to adequately cool the core." Provide changes to Basis to address cold shutdown guidance in NEI 99-01 CA1 Basis, or justification for differences.			ANO needs to clarify wording
28	<u>CA3 SS1</u>	ANO	21	<u>CA3 SS1</u>	ICs for NEI 99-01 for CA3 and SS1 states, "Loss of All Offsite Power and Loss of All Onsite Power to Essential Busses." Licensee defines "essential busses" as "required 4.16 KV busses" under CA3 IC and "vital 4.16 busses" under SS1 IC. Licensee also uses term "emergency busses" in CA1 EAL criterion, which is consistent with NEI 99-01 guidance, but uses the term "vital busses" in SS1 EAL criterion. In addition, NEI 99-01 example EAL criterion for CA3 and SS1 are identical, with the exception of mode applicability, but licensee criteria under CA3 and SS1 are not consistent. Licensee criterion under SS1 would not allow credit for the restoration of offsite power to an essential bus, but only from an emergency diesel generator. Provide justification for deviation in term definition and interpretation of EAL criterion between licensee CA3 and SS1, and the apparent failure to address a restoration of offsite power to an essential bus within			ANO to provide additional information

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					15 minutes under SS1.			
29	<u>CA3 / EAL 1</u>	RBS	21	CA3 #1	RBS EAL is not including status of EDGs, which is critical to this EAL. Use of "unplanned" implies that if intentionally performed then EAL is not applicable. This is a deviation. If that is your intend, then provide detailed justification for this deviation.			RBS to provide additional information.
30	<u>CA3 / EAL 1.b</u> <u>SA5</u> <u>SS1</u> <u>SG1</u>	W3	28	<u>CA2 Basis</u> <u>SA1 Basis</u> <u>SS1 Basis</u> <u>SG1 Basis</u>	Licensee Basis takes credit for temporary emergency diesels that may be used to supplement onsite AC power in the event emergency diesels are lost. Provide technical justification for deviation from NEI 99-01 CA3 / EAL 1.b criterion, which requires licensee to list site-specific emergency diesel generators that are part of plant design and safety analysis, or provide change to comply with NEI 99-01 guidance. In addition, clarify specific reference to where credit is taken for temporary diesel generators in safety analysis report accident analyses or station blackout coping analysis.			W3 to provide additional information
31	<u>CA3 Basis</u>	W3	27	<u>CA2 Basis</u>	Licensee in Basis discussion substitutes the term "available" in lieu of NEI 99-01 term "operable", which is defined per technical specifications. Use of the term "available" is also inconsistent with licensee SS1 Basis, which uses term "operable". Provide further technical justification for deviation from NEI 99-01 guidance and define "available" in relation to technical specifications under Basis definitions, or provide changes to comply with NEI 99-01 guidance.			W3 to clarify wording
32	<u>CA4</u>	GGNS	12	CA4 Dev/Diff document	Provide better justification why no reference to RCS reduced inventory. It was included for River Bend (BWR).			GGNS/RBS standardize wording and format
33	<u>CA4 / EAL1,2,3</u>	RBS	22	CA4 #1,2,3	Compare w/ GG, RBS format may be better.			GGNS/RBS standardize wording and format

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
34	<u>CS1-EAL 2.a</u> <u>CS2-EAL 2.a</u> <u>CG1-EAL 2.a</u>	ANO	22	<u>CS1 EAL 2</u> <u>CS2 EAL 2</u> <u>CG1 EAL 2</u>	Licensee does not address NEI 99-01 criterion: "(RPV inventory as indicated by) RPV level less than TOAF [<i>top of active fuel</i>]", based on justification that RVLMS will not monitor level below the bottom of ID of the RCS loop. Provide further technical justification, based on both ANO-1 and ANO-2 instrumentation capabilities, for omission of NEI 99-01 criterion consistent with response to Specific Comment #20. If instrument design may allow for RPV level indication at TOAF under certain conditions, then provide specific justification why criterion was not addressed, or proposed changes to comply with NEI 99-01 guidance.			ANO to clarify wording
35	<u>CS1-EAL 1</u>	RBS	23	CS1 #1	1c. does not appear to be correct w/ CTMT not Established. (direct to environ.) This appears to be consistent with GG1. Review this EAL, and correct to be consistent with NEI EAL guidance.		X	
36	<u>CG1 / EAL 2.b</u>	W3	34	<u>CG1 EAL 2</u>	Provide site-specific setpoint for Containment High Range Radiation Monitor reading within indicate core uncovery based on NEI 99-01 guidance for CONTAINMENT CLOSURE established.			W3 will add number and provide calculation
37	<u>CG1 / EAL 3</u> <u>Table 5-F-4</u> <u>Containment</u> <u>Barrier Example</u> <u>EAL #2</u>	W3	35	<u>CG1 EAL 3</u> <u>CNB1 Potential Loss</u>	Clarify whether safety analysis report or other site-specific accident analyses identify a site-specific explosive mixture that would represent a challenge to containment, equivalent to at least the lower deflagration limit. If not, discuss why explosive mixture, equivalent to at least the lower deflagration limit, could not be determined based on Industry and owners group guidance. In addition, discuss basis for Containment hydrogen threshold under Basis for CNB1.		X	
38	CS1 and CS2 /	W3	30	<u>CS1</u>	Under CS1 and CG1, licensee does not			W3 make numbering agree

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
	<u>EAL 2.a</u> <u>CG1 / EAL 2.a</u>			<u>CG1</u>	address NEI 99-01 criterion associated with RPV level corresponding to the TOAF. This is inconsistent with FCB3, Potential Loss of the Fuel Clad Barrier, and licensee SG12 which defines TOAF as "RVLMS upper plenum level \leq 20%." Provide further technical justification for the deletion of TOAF criterion, based on use of criterion in FCB3, or provide changes in CS1 and CG1 to comply with NEI 99-01 guidance.			
39	<u>CS1 / EAL 2.b</u>	W3	31	<u>CS1</u>	Per NEI guidance, with CONTAINMENT CLOSURE established, the inability to monitor RPV level for > 30 minutes with EITHER an unexplained sump and tank level increases OR erratic source range monitor indication would require classification. Describe how in Mode 5 (cold shutdown) with CONTAINMENT CLOSURE established, NEI 99-01 CS1 / EAL 2.b criterion for erratic source range monitor indication with the inability to monitor RPV level for > 30 minutes, is met.			W3 split out EALs
40	<u>CS2-EAL 2.b</u>	ANO	23	<u>CS2 EAL 1</u>	Licensee EAL 1.a criteria is not consistent with NEI 99-01 guidance, but rather duplicates that in Example EALs 2.b (with the exception of SRM and CTE indication). In addition, the criterion "Reactor vessel level cannot be monitored for greater than 30 minutes", was inserted under licensee CS2 - EAL 1.b and 2.b ; however, this criterion is not provided under NEI 99-01 CS2 example EALs or basis, nor are deviations adequately justified by licensee. Provide further technical justification for deviations, or proposed change to comply with NEI 99-01 guidance.			ANO perform additional research
41	<u>CS2-EAL 1.a & 2.b</u> <u>CG1-EAL 2.a</u>	ANO	24	<u>CS2 EAL 2</u>	NEI 99-01 guidance establishes "Containment High Range Radiation Monitor reading > [site-specific] setpoint"			ANO to perform calculation

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
				<u>CG1</u> <u>EAL 2</u>	as a criterion as evidence that RPV level cannot be monitored with indication of core uncover. Licensee does not consider this criterion because ANO's monitors have not been analyzed for this setpoint. However, the intent of this "site-specific" criterion is for the licensee to perform calculation which should be performed at TOAF for both Containment Closure established and not established configurations. In addition, criterion "RPV level cannot be monitored with indication of core uncover" is not reflected in licensee criteria. Provide site-specific Containment High Range Radiation Monitor setpoints (readings) or further justification why setpoint (reading) cannot be calculated per NEI 99-01 guidance. Also, address NEI 99-01 statement "RPV level cannot be monitored with indication of core uncover", or provide further justification why statement was not considered.			
42	<u>CS2 / EALs 1.b and 1.b</u>	W3	32	<u>CS1</u>	Licensee provides a valid high alarm on the Containment High Range Radiation Monitor, rather than exceeding a site-specific setpoint as established under NEI 99-01 guidance. Licensees justification for this deviation is that this value was not calculated due to the range of unknowns involved, including time after shutdown and reactor vessel head installation status and installation of external structures. However, NEI 99-01 in Basis guidance states that calculations should be performed to conservatively estimate a dose rate indicative of core uncover (i.e., level at TOAF), and in specifically required monitor reading for both CONTAINMENT CLOSURE established and not established to account for reactor vessel head installation status and installation of external structures. Provide site-specific setpoints for Containment High Range Radiation Monitor readings			W3 to provide calculation

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					within indicate core uncover based on NEI 99-01 guidance for CONTAINMENT CLOSURE established and not established.			
43	<u>CA4 / EAL 3</u>	W3	29	<u>CA3 EAL 3</u>	Provide justification that the 20 psig is the lowest RCS pressure that can be read on installed Control Room instrumentation (that is equal to or greater than 10 psig) per guidance in NEI 99-01 Basis for EAL 3. In addition, provide justification in NEI EAL Differences Document for including qualifier, "...due to reactor vessel inventory temperature increase", in EAL 3 criterion.			W3 to evaluate set point
44	<u>CS2 / EALs 1.b and 1.b</u>	W3	33	<u>CS3</u>	Provide justification for the designation "Core Exit Thermocouple > 700°F" as a site-specific indication of core uncover.			W3 to provide additional justification.

ISFSI

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
1	<u>E-HU1</u> <u>E-HU2</u>	ANO	25	<u>E-HU1</u> <u>E-HU2</u>	Mode applicability is considered "not applicable" per NEI 99-01 guidance, since classification based on a ISFSI / dry storage-related event is not tied to plant operating mode. Licensee chose to list all operating modes, including Defueling. Provide justification for deviation from NEI 99-01 guidance.			ANO to explain methodology
2	<u>E-HU1-EALs 1 & 2</u>	ANO	26	<u>E-HU1</u> <u>EALs</u> <u>1 & 2</u>	Thresholds for natural phenomena and accident conditions established by the licensee appear to provide insufficient detail. EAL user is required to use Basis to determine magnitude or consequence of event for classification purposes (e.g., high winds <i>resulting in a loss of shielding due to missile impact</i> , tornado resulting in a long-term loss of heat transfer due to blockage of air inlets, case drop <i>greater than X ft.</i> , etc. In addition, EALs do not address a tipped-over cask or a seismic event as listed in NEI 99-01 E-HU1 Basis and licensee Basis. Provide specific thresholds for identified natural phenomena and accident conditions listed, based on description in licensee Basis. In addition, provide a listing of natural phenomena and accident conditions considered in the results of the ISFSI Safety Analysis Report (SAR) per NUREG-1536 or SAR referenced in the cask's Certification of Compliance and related NRC Safety Evaluation Report.			ANO to provide more detail

FISSION PRODUCT BARRIER

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
1	<u>FA1</u>	GGNS	17	<u>FA1</u>	Typo for font in IC A reactor pressure boundary@			GGNS to correct Typo
2	<u>Table 5-F-2 : Fuel Clad Barrier Example EAL1</u>	RBS	24	FC Barrier #1	Explain use of 300 uci/gm, versus the use of 4 uci/gm for this EAL at other Entergy BWRs. In justification, provide evidence that the 300 uci/gm activity would correspond to less than 5% fuel failure, as referenced in NEI 99-01.	X		4 uci/gm ?
3	<u>Table 5-F-4</u>	W3	37	<u>Fission Product Barrier Degradation</u>	Licensee Basis states that "Waterford 3 uses Safety Function Status Checks developed by the Combustion Engineering Owners Group (CEOG) which are based on the logic similar to that used for CSFSTs [<i>Critical Safety Function Status Trees</i>] developed for Westinghouse PWR [<i>Pressurized Water Reactor</i>]. Clarify whether technical equivalency can be identified related to the following critical safety function statuses identified in NEI 99-01, Table 5-F-4: – Core Cooling - Red – Core Cooling - Orange – RCS Integrity - Red – Heat Sink - Red – Containment - Red		X	W3 provide copy of CEOG Document
4	<u>Table 5-F-2: Containment Barrier Example EAL #2</u>	GGNS	14		Is the use of A-192 in@ a typo in the difference explanation? Provide more detailed discussion on the use of either level indication justification (as referenced in 99-01, TOAF or 2/3 coverage of active fuel) and identify which value is used for this EAL.			GGNS provide additional clarification
5	<u>Table 5-F-2: RCS Example EAL #3</u>	GGNS	15		NEI 99-01 EAL #2 (potential loss outside drywell) is missing. Discuss the deviation and provide justification for omitting or include in EAL scheme.			GGNS change to agree with RBS

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
6	<u>Table 5-F-4: Containment Barrier Example EAL #2</u>	ANO	29	<u>CNB1 2nd LOSS</u>	Licensee states "Containment pressure not consistent with event response". This is inconsistent with NEI 99-01 criterion, which states "Containment pressure or sump level not consistent with LOCA conditions". Change was not identified by licensee as a deviation or difference under Attachment 4. Identify as a deviation or difference and provide technical justification, or provide proposed change to comply with NEI 99-01 guidance.			ANO provide clarification
7	<u>Table 5-F-4: RCS Barrier Example EAL #2</u>	W3	39	<u>RCB2 Potential Loss</u>	Provide justification for establishing a specific RCS leak rate versus NEI 99-01 guidance criterion statement of "...exceeding the capacity of one charging pump in the normal charging mode", since pump discharge rate may vary based on plant conditions, or provide change to comply with NEI 99-01 Table 5-F-4 criterion.			W3 provide additional information (has positive displacement pump)
8	<u>Table 5-F-2: RCS Barrier Example EAL #3</u>	RBS	27	RBS PC #3	Explain use of 9500 mr/hr justification for id of CTMT leakage. Value appears quite high to be associated with leak path (in that there would have to also be some core damage).			RBS to coordinate response with GGNS
9	<u>Table 5-F-2: RCS Barrier Example EAL #4</u>	RBS	28	PC #4	Caution in 99-01 on failure of 2 barriers by these conditions does not appear in EAL and Basis. Recommend adding to make clear loss of more than one barrier.	X		
10	<u>Table 5-F-2: RCS Barrier Example EAL #4</u>	RBS	25	RCS Barrier #4 NEI	NEI 99-01 discusses the inclusion of shine dose in this EAL, and expects that a differentiation be applied to determine the presence of either a single barrier or 2 barriers (clad and RCS) lost. It does not appear that the deviation is acceptable justification to omit this EAL. Provide specific information for this EAL, consistent			RBS and GGNS should have common approach

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					with other Entergy sites if possible, to include within this scheme.			
11	<u>Table 5-F-2: RCS Barrier Example EAL #5</u>	RBS	26	RCS Barrier #5 NEI	Additional information may be warranted for this EAL, beyond simply a stuck open relief valve. As example, also increases in suppression pool bulk temperature greater than TS limit.	X		
12	<u>Table 5-F-4: Containment Barrier Example EAL #2</u>	ANO	30	<u>CNB1 1st POTENTIAL LOSS</u>	EAL criteria statement in Attachment 4 is worded, "Design pressure and increasing hydrogen concentration > 4%". This is inconsistent with NEI 99-01 guidance, which states "(Site-specific) PSIG and increasing OR Explosive mixture exists". Revise POTENTIAL LOSS criteria in Attachment 4 to reflect consistency with NEI 99-01 guidance.	X		
13	<u>Table 5-F-4: Containment Barrier Example EAL #2 CG1-EAL 3</u>	ANO	31	<u>CNB1 2nd POTENTIAL LOSS CG1 - EAL 3</u>	NEI 99-01 guidance establishes criterion, "Explosive mixture exists", which per the NEI 99-01 Basis means a hydrogen and oxygen concentration of at least the lower deflagration limit curve exists. The licensee's criterion only states "Containment Hydrogen Concentration greater than 4%", and does not address oxygen component. Provide hydrogen and oxygen concentrations reflective of the lower deflagration limit for ANO1 and ANO 2 containment structures, or provide further justification why oxygen concentration is not applicable to ANO1 and 2. In addition, revise criteria identified for an "explosive mixture inside containment" under CG1 - EAL 3 to ensure consistency with threshold in CNB1.			ANO to provide additional discussion on 4% concentration
14	<u>Table 5-F-4: Containment Barrier Example EAL #3</u>	ANO	32	<u>CNB2 POTENTIAL LOSS</u>	<i>NEI 99-01 guidance defines a POTENTIAL LOSS as "core exist thermocouples in excess of 1200 degrees and restoration procedures</i>			ANO provide additional justification

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					<i>not effective within 15 minutes." Licensee has revised NEI 99-01 statement for ANO-1 to state, "Significant ICC exists as evidenced by CETs indicating superheated conditions...", but does identify change as a deviation or difference. Identify as deviation or difference and provide justification, as applicable to ANO-1, for or provide proposed change to comply with NEI 99-01 guidance.</i>			
15	<u>Table 5-F-4: Containment Barrier Example EAL #3</u>	ANO	33	<u>CNB2 POTENTIAL LOSS</u>	<i>NEI 99-01 guidance also defines a POTENTIAL LOSS as "core exit thermocouples in excess of 700 degrees with reactor vessel level below top of active fuel and restoration procedures not effective within 15 minutes." Licensee states that this criterion is not considered since RVLMS is used as an indication of potential core uncover only if core exit thermocouple (CET) indication is unavailable. Provide further technical justification for deviation consistent with response to Specific Comment #23.</i>			ANO to provide additional justification
16	<u>Table 5-F-2: RCS Barrier Example EAL #4</u>	GGNS	16	RCS Barrier EAL #4	<i>This EAL is omitted from the GG EALs. This is listed as a difference due to location of monitors. The explanation is not sufficient to justify the omission. Provide more justification why this EAL should be omitted or add NEI 99-01 EAL to the scheme.</i>			GGNS align with RBS
17	<u>Table 5-F-4: Containment Barrier Example EAL #4, 1st criterion</u>	ANO	34	<u>CNB3 LOSS</u>	<i>Licensee considers NEI 99-01 criterion, "RUPTURED S/G is also faulted outside of containment", as redundant, and therefore, does not address or provide further justification. NEI 99-01 Basis (3rd paragraph) acknowledges that "[u]users should realize that the two "loss" EALs</i>	X		

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					described above could be considered redundant." Per NEI 99-01 Section 5.4, this criteria is defines as preliminary-to-secondary leakage of sufficient leakage to require or cause a scram and safety injection (<u>RUPTURED</u>) <u>AND results in uncontrolled S/G pressure or S/G being drained completely.</u> This differs from Containment Barrier Example EAL 4 (2 nd criterion) which reflects a non-isolable (prolonged) release path to the environment from the affected S/G. Provide further technical justification for deviation or proposed change to comply with NEI 99-01 guidance.			
18	<u>Table 5-F-2: Containment Barrier Example EAL #5</u>	RBS	29	NEI CTMT Barrier #5	**Look at other sites for comparison. Appears to be some additional conditions that should be referenced here.	X		
19	<u>Table 5-F-4: RCS Barrier Example EAL #4</u>	ANO	28	<u>RCB4</u>	Provide basis for 60 uCi/gm dose equivalent I-131, consistent with NEI 99-01 guidance.	X		
20	<u>Table 5-F-4:RCS Barrier Example EAL #4</u>	ANO	27	<u>RCB4</u>	Indications for an RCS Barrier LOSS, based on Containment Radiation Monitoring, were omitted from EAL Matrix in Attachment 2. Revise EAL Matrix to reflect RCB4 indications as outlined in EAL Basis (Attachment 3).			ANO correct EAL Matrix
21	<u>Table 5-F-2:RCS Barrier Example EAL #4</u>	GGNS	19	Reactor Pressure Boundary Parameters RPB Leak Rate	Justify the omission of A inside the drywell@ for the potential loss for greater than 50gpm RPB leakage.			GGNS coordinate response with RBS
22	<u>Table 5-F-4: Containment Barrier Example EAL #4</u>	W3	40	<u>CNB3 Loss</u>	Provide EAL corresponding to NEI 99-01 criterion for a "RUPTURED S/G [steam generator] is also FAULTED outside the containment," per Basis		X	

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					definitions, or provide specific technical justification for deviation from NEI 99-01 guidance.			
23	<u>Table 5-F-2: Containment Barrier Example EAL #4</u>	GGNS	20	Primary CTMT Parameters, Hydrogen Concentration	NEI 99-01 also discusses O2 levels, which are omitted in the GG EAL. Justify your omission of the oxygen concentration and comparison to the lower deflagration limit.	X		
24	<u>Table 5-F-2: Containment Barrier Example EAL #4</u>	GGNS	21	Primary CTMT Parameters, Primary CTMT Iso. Failure Or Bypass (also in Dev/Diff document).	Define ASAPs@. Justify the deviation from declaring a loss from CTMT venting per EOPs, which is referenced in NEI 99-01. (This is incorrectly listed as a difference.)	X		
25	<u>Table 5-F-2: Containment Barrier Example EAL #4</u>	GGNS	22	Primary CTMT Parameters, Primary CTMT Rad Monitoring (also in Dev/Diff document).	Justify the value (> 11,500 R/hr) in regard to being representative of 20% fuel clad damage.			GGNS to evaluate use of RBS approach
26	<u>Table 5-F-4: Containment Barrier Example EAL #5</u>	ANO	35	<u>CNB4 LOSS</u>	Licensee criterion states, Unisolable breach of containment with a direct release path to the environment following containment isolation actuation." This is inconsistent with NEI guidance, which states "Valve(s) not closed AND downstream pathway to the environment exists." In addition, licensee chose not to incorporate NEI 99-01 Basis discussion into CNB4 Basis. Identify changes as deviation or difference, and provide justification			ANO evaluate addition of new wording

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					for change in EAL wording. Also, provide rational for the failure to address NEI 99-01 Basis guidance.			
27	<u>Table 5-F-4: Containment Barrier Example EAL #5</u>	W3	41	<u>CNB4 Loss</u>	Provide justification for addition of qualifier, "...following containment isolation actuation."			W3 consider modifying wording
28	<u>Table 5-F-4: Containment Barrier Example EAL #6</u>	ANO	36	<u>CNB5 POTENTIAL LOSS</u>	Clarify in licensee Basis that Containment high range radiation monitor reading of 4,000 R/hr corresponds to 20% fuel clad damage, or other site-specific analysis value, per the guidance in NEI 99-01 Basis.	X		
29	<u>Table 5-F-2: Fuel Clad Barrier Example EAL #6</u>	GGNS	18		Provide justification that compares the listed 5% clad failure with A300 uci/ml@ value in NEI 99-01. To be consistent with 99-01, the EAL for clad failure should be 300 uci/ml.	X		
30	<u>Table 5-F-4: Fuel Clad Barrier Example EAL #6</u>	W3	38	<u>Fission Product Barrier Degradation</u>	Provide evaluation of other site-specific indications of a loss or potential loss of the Fuel Clad Barrier per NEI 99-01 guidance, including indications from containment air monitors or other site-specific instrumentation.			W3 provide additional justification
31	<u>Table 5-F-4: Containment Barrier Example EAL #7</u>	ANO	37	<u>CNB6</u>	NEI 99-01 Basis states this EAL should cover other site-specific indications, including: area or ventilation monitors in containment annulus or other contiguous buildings that may unambiguously indicate a loss or potential loss of the containment barrier, or venting of containment per site emergency operating procedures. Provide rational in licensee Basis why these criteria are not considered applicable to ANO-1 and/or ANO-2 Containment structures, or proposed wording to comply with NEI 99-01 Basis guidance.		X	W3 has lead to contact NEI in advance of NRC meeting

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
32	<u>Table 5-F-4: Containment Barrier Example EAL #7</u>	W3	42	<u>Fission Product Barrier Degradation</u>	Provide evaluation of other site-specific indications of a loss or potential loss of the Containment Barrier per NEI 99-01 guidance, including indications from area or ventilation monitors in containment annulus or other contiguous buildings, or the intentional venting of containment per emergency operating procedures to prevent a catastrophic failure.	X		
33	<u>Table 5-F-4: Containment Barrier Example EAL #6 & 7</u>	ANO	38	<u>CNB6 POTENTIAL LOSS</u>	Licensee chose to include "at least 20% fuel damage failure as determined from core damage assessment" as a POTENTIAL LOSS of containment, based on basis for CNB5 (Significant Radioactive Inventory in Containment). In CNB6 Basis, licensee justifies EAL by stating that "[r]egardless of whether containment is challenged, this amount of activity in containment, if released, could have such severe consequences that it is prudent to treat this as a potential loss of containment." Describe why the licensee believes that this concern is not adequately address under CNB5, based on containment radiation monitor readings, since this is intent as outlined in NEI 99-01 Table 5-F-4, Containment Barrier Example EAL 6 Basis.			ANO provide additional justification of approach

HAZARDS

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
1	<u>HU1</u>	GGNS	26	Dev/Diff document	More justification is necessary to justify omission of this EAL. Considerations for more than river flooding should be discussed, such as storm drain overflow, water main piping flooding, etc. This is incorrectly listed as a difference, instead of a deviation. Consider adding EAL to scheme, or provide detailed justification for this deviation.			GGNS to evaluate flooding
2	<u>HU1-EAL 2</u>	ANO	41	<u>HU6 EAL 2</u>	Please provide specific references to safety analysis report (SAR) for Units 1 and 2 high winds design basis under Reference Document listing in Attachment 3 (Basis).			ANO to provide additional information
3	<u>HU1-EAL 3</u> <u>HU4-EAL 3</u>	RBS	30	HU1#3 RBS HU4#3	Additional clarification should be provided to ensure that the operator understands that actual resulting damage is not a prior basis for classification.	X		Discuss NOUE vs Alert
4	<u>HU1-EAL 6</u>	ANO	42	<u>HU6 EAL 6</u>	Provide site-specific listing, as specified by NEI 99-01 guidance, of areas of the plant where uncontrolled flooding has the potential to affect safety-related equipment.			ANO to provide plant specific list
5	<u>HU1 / EAL 6</u> <u>HA1 / EAL 5</u>	W3	43	<u>HU6 EAL 6</u> <u>HA6 EAL 5</u>	Clarify inconsistency between HU6 / EAL 6 and HA6 / EAL 5, regarding site-specific areas containing systems required for the safe shutdown of the plant, that are not designed to be wetted or submerged, that would be impacted by <u>internal</u> flooding per NEI 99-01 guidance (e.g., HU6 states -35 elevation areas vs. HA6 which states Reactor Auxiliary Building). In addition, identify the basis used for determining these areas (i.e.,			W3 to clarify and make EAL more specific
6	<u>HU1-EAL 7</u>	ANO	43	<u>HU6 EALs 7 & 8</u>	Describe technical basis for low and high lake water level and provide reference to basis under Reference			ANO to provide reference

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					Documents in Attachment 3 (Basis).			
7	<u>HU1-EAL 7</u>	ANO	44	<u>HU6</u>	Describe whether the ANO site is subject to other site-specific phenomena, such as hurricanes, or subject to severe weather as defined in the NUMARC station blackout initiative (i.e., activation of severe weather mitigation procedures) per guidance in NEI 99-01 Basis. If applicable, include site-specific EALs.	X		
8	<u>HU2</u>	GGNS	24	HU4	IC is different in GG HU4, (protected area boundary versus power block). Further, in the basis, NEI 99-01 describes a more detailed generalization of areas in actual contact or immediately adjacent to plant vital areas, which are referenced but not defined in GG EALs. Justify the deviation from the IC and describe the areas in the plant that you intend to apply to this EAL.			GGNS to add list of buildings
9	<u>HU3-EAL 1</u>	ANO	40	<u>HU5 EAL 1</u>	NEI 99-01 qualifier "...enter the site boundary area..." was replaced with "...enter normally occupied areas of the site". This interpretation is not consistent with NEI 99-01 guidance, which considers the impact of any toxic or flammable gases that has or could enter the site area boundary, and not just occupied areas, on normal plant operations (as defined in Section 5.4 to NEI 99-01). Identify change as a deviation or difference and provide justification for further consideration, or provide proposed change to comply with NEI 99-01 guidance.	X		What is site boundary?
10	<u>HU3-EAL 2</u>	GGNS	23	HU3 EAL #2 (also in Dev/Diff document).	Wind speed limits are not included in the EAL (as in NEI 99-01, HU1, #2). Justify the deviation from listing wind speeds in the EAL. (This is incorrectly listed as a difference.)			GGNS coordinate response with RBS

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					<p>In the HU1 Deviation/Difference document, the justification is that hurricane force winds have never been recorded. Severe winds from very strong storms can occur (greater than minimal hurricane force) as can hurricanes. (There is ample evidence of hurricanes existing for several hundred miles inland.) Typically, wind loading analysis is included in FSARs. Recommend providing wind limit to EAL or providing detailed justification for this deviation.</p> <p>Justify the omission of EALs # 6 and #7 in HU3, as compared to 99-01 HU1.</p>			
11	<u>HU3</u>	GGNS	25	<u>HU5</u>	<p>EAL #2 is missing from the GG EALs. Justify your deviation from NEI 99-01 by omitting EAL #2.</p> <p>In the Deviation/Difference document, NEI 99-01 HU3 is omitted, with a difference listed that no industries are in the Grand Gulf area affecting evacuation or sheltering. This fails to consider river barges, tanker accidents (rail or roadway) or other possible toxic gas, smoke, etc. scenarios. Recommend adding EAL or providing detailed justification for the deviation to not include this EAL.</p>			GGNS to add EAL
12	<u>HU4-EAL 2</u>	ANO	39	<u>HU1 EAL 2</u>	<p>Licensee deleted the term "site-specific" from EAL wording and chose not to include the NEI Basis discussion, which states "Only the plant to which the specific threat is made need declare the Notification of an Unusual Event". Describe how EAL 2 would allow for the differentiation between a general (i.e., threat against company facilities / property) versus directed at station, since "site-specific" criteria was deleted from EAL wording</p>			ANO to add additional wording

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					and basis. In addition, identify changes as deviations or differences and provide justification for further consideration, or provide proposed change to comply with NEI 99-01 guidance.			
13	<u>HU4-EAL 2</u>	RBS	31	HU5 #2	Explain additional wording in EAL , "expected to enter normally occupied areas". This appears to deviate from intent of EAL. If notified of evacuation, then it is expected that the site would perform some protective action, such as evacuating. The entry on toxic gas into normally occupied areas is not intended to be part of the criteria to declare per this EAL.	X		What is normally occupied areas?
14	<u>HU5-EAL 1</u>	RBS	32	JU1 #1	This EAL is a judgment EAL for a general emergency. Modify to meet NEI EALs.			RBS to modify numbering
15	<u>HU5-EAL 1</u>	RBS	36	JA1 #1	(Duplicate)This EAL is a judgment EAL for a general emergency. Modify to meet NEI EALs.			RBS to modify numbering
16	<u>HU5-EAL 1</u>	RBS	37	JS1 #1	This EAL is a judgment EAL for a general emergency. Modify to meet NEI EALs.			RBS to modify numbering
17	<u>HA1 & HA2</u>	GGNS	27	HA4	Wind speed limits are missing from the GG EAL, #2. Deviation/Difference document discusses highest recorded wind speed as 69 mph, but does not review FSAR wind loading analysis or a comparison of historical events in the southeast to determine if there are other examples of hurricane force winds extending several hundred miles inland. Reexamine UFSAR to ensure that wind loading is not included (not just hurricane). EAL #4 uses vital area instead of specific areas containing functions and systems necessary for safe shutdown			GGNS to modify wording

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					(though may be the same). HA4 #4 references A causing damage@ as opposed to A affecting operability of@ as in NEI 99-01, HA2. Change to match 99-01 EAL or provide detailed justification for this deviation.			
18	<u>HA1-EAL 1</u>	ANO	48	<u>HA6 EAL 1</u>	Provide description in EAL 1 Basis that supports the selection of 0.1g as indicative of an Operating Basis Earthquake (OBE), and reference to site-specific technical basis (i.e., SAR, etc.) under Reference Documents in Attachment 3.			ANO to add reference
19	<u>HA1-EAL 2</u>	ANO	49	<u>HA6 EAL 2</u>	Licensee does not include the "Turbine Building", since it does not contain a vital area. Clarify whether damage to equipment in the turbine building due to high winds could cause, either directly or indirectly, damage to safety functions and systems required for the safe shutdown of the plant per NEI 99-01, HA1 Basis. If so, provide proposed change to comply with NEI 99-01 guidance to include the Turbine Building in Table H-2.	X		
20	<u>HA1-EAL 3</u>	ANO	50	<u>HA6 EAL 3</u>	Licensee Basis contains statement, "If the crash is confirmed to affect a plant vital area, escalation to ALERT is appropriate"; however, this statement is applicable to licensee HU6 Basis rather than HA6 Basis per NEI 99-01 guidance. Provide justification for including statement in HA6 Basis.			ANO will provide additional justification
21	<u>HA1-EAL 4</u>	ANO	51	<u>HA6 EAL 4</u>	Licensee references Table H-2 areas rather than developing a site-specific listing of areas, containing safety functions and systems required for the safe shutdown of the plant, that could realistically be impacted by turbine failure-generated missiles. Provide	X		

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					justification for referencing Table H-2, rather than developing site-specific areas based on NEI 99-01 guidance.			
22	<u>HA1 EAL5 & 6</u>	GGNS	28	HA1 EALs # 5 and #6 missing.	Provide justification for the deviations from 99-01. Correct in Deviation/Differences document to record as a deviation, with detailed justification why appropriate to eliminate. In justification, include analysis of other than Ariver flooding @, as discussed previously.			GGNS to address flooding
23	<u>HA1-EAL 5</u>	ANO	52	<u>HA6 EAL 5</u>	Provide justification for the failure to identify site-specific areas, per NEI 99-01 guidance, which include areas that contain systems required for safe shutdown of the plant, that are not designed to be wetted or submerged.			ANO will provide list
24	<u>HA1-EAL 6</u>	ANO	53	<u>HA6 EAL 6</u>	Provide reference to technical basis (i.e., SAR, etc.) for ALERT classification based on low lake level, and include reference to technical basis(es) under Reference Documents in Attachment 3.			ANO will provide additional information
25	<u>HA2-EAL 1</u>	ANO	46	<u>HA4 EAL 1</u>	Licensee Basis does not include 1 st paragraph from NEI 99-01 guidance providing basis for selection of site-specific areas. Describe basis for the selection of Table H1 areas based on NEI 99-01 guidance (i.e., safe shutdown analysis, etc.).			ANO to add additional information
26	<u>HA2 / EAL 1</u>	W3	45	<u>HA4</u>	Identify the basis used for determining site-specific areas containing functions and systems required for the safe shutdown of the plant (i.e., site-specific safe shutdown analysis, etc.).			W3 will provide additional information
27	<u>HA3-EAL 1</u>	ANO	47	<u>HA5 EAL 1</u>	Licensee inserted the following qualifier in Basis: "Areas that require only temporary access that can be supported by the use of respiratory			ANO will provide additional information

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action	
					protection should not be considered as exceeding this threshold. However, this qualifier is not addressed under NEI 99-01 guidance. In addition, licensee fails to identify the addition of this qualifying Basis statement under Deviations in Attachment 4. Identify change as a deviation or difference, as appropriate, and provide justification, or provide proposed change to comply with NEI 99-01 guidance.				
28	<u>HA3-EAL 1</u>	RBS	34	HA3 #1	Specific areas are not listed. Explain deviation why those areas are not listed and or provide list.			RBS will add EAL. (GGNS and RBS to work together for common approach.	
29	<u>HA3-EAL 1</u>	RBS	35	HA3 #1	(Duplicate Question) Specific areas are not listed. Explain deviation why those areas are not listed and or provide list.			RBS will add EAL. (GGNS and RBS to work together for common approach.	
30	<u>HA5-EAL 1</u>	ANO	45	HA3	Provide justification for use of qualifier, "in progress", rather than "has been initiated" as stated in IC, or provide proposed change to comply with IC statement. In addition, clarify that a site-specific procedure does not exist governing control room evacuation.		X		
31	<u>HA5 / EAL 1</u> <u>HS2 / EAL 1</u>	W3	44	HA3 HS3	<i>Provide site-specific procedure or equivalent objective measure, which upon entering procedure, initiating specific procedural step or action, or reaching criteria, would reflect requirement for control room evacuation. Entry into this procedure or meeting a designated procedural step or criteria is used under licensee HS3 to determine whether control of plant was established outside the control room within 15 minutes.</i>			W3 to provide procedure reference	
32	<u>HA5 / EAL 4</u>	RBS	33	HA5 #4	NEI IC and EAL missing. (typo)	X			
33	<u>HS1 (also in Deviation/Differences</u>	GGNS	29	HS1	GG EAL considers only an armed attack against the plant, versus the			GGNS to modify justification	

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
	document).				other considerations in 99-01 (insider destruction of equipment, sabotage, hostage/extortion). Justify the deviation from the 99-01 other considerations. Justify the omission of EAL #2 from GG EALs. NEI 99-01 HS1, EAL #2 is missing from GG EALs. This is noted as a difference@, and appears to be a deviation. Provide more detailed justification why it is appropriate to omit this EAL.			
34	<u>HS2-EAL 1</u>	ANO	54	<u>HS3 EAL 1.b</u>	<i>Provide justification, based on site-specific analysis or assessments per NEI 99-01 guidance, as to how quickly control must be re-established to ensure that core uncovering and/or core damage will not occur with the 15 minute time threshold established. In addition, please identify as deviation or difference, as appropriate, and provide justification regarding the failure to include site-specific procedure reference for the transfer of plant control during a control room evacuation.</i>			ANO will provide additional information.
35	<u>HS2 / EAL 1</u>	W3	46	<u>HS3 EAL 1</u>	Please provide justification, based on site-specific analysis or assessments per NEI 99-01 guidance, as to how quickly control must be re-established to ensure that core uncovering and/or core damage will not occur with the 15 minute time threshold established.			W3 will provide additional information
36	<u>HG1</u>	GGNS	30	<u>HG1</u>	SFP loss of control is not addressed in the EALs, as discussed in NEI 99-01 EAL basis. Justify the deviation from referencing SFP conditions in the EAL.			GGNS to address in basis document
37	<u>HG2-EAL 1</u>	ANO	55	<u>HG2 EAL 1</u>	Identify as a deviation or difference, as appropriate, and provide justification for change in EAL wording referring to	X		

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					exceeding EPA Protective Action Guideline exposure levels "beyond the exclusion area", rather than NEI 99-01 guidance, and that defined for a General Emergency by licensee under Section 4.10.4, of "offsite for more than immediate site area".			

SYSTEM MALFUNCTION

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
1	<u>SU1</u>	GGNS	8	SU1 Dev/Diff document	Justify the deviation (not difference) between the mode applicability between GG EALs and NEI 99-01 EALs. Typo under difference.			GGNS will develop separate category for cold shutdown EALs
2	<u>SU1-EAL 1</u>	ANO	56	<u>SU1 EAL 1</u>	Under the Basis, the licensee has chosen to include a discussion, which states that "...failure of the offsite power sources results in a loss of RCPs..." Intent of NEI 99-01 guidance is to reflect a prolonged loss of offsite power, and is not intended to consider the loss of specific station loads. Provide further clarification whether Basis statement, included by licensee, would preclude classification of event based on the loss of offsite power if specific station loads were not lost. If so, provide further justification for deviation or proposed change to comply with NEI 99-01 guidance.			ANO will provide additional information
3	<u>SU1-EAL 1</u>	RBS	38	SU1 #1	Inclusion of EDG status should be added consistent with 99-01. Explanation in Differences section is not the correct logic for discussion of EDGs.			
4	<u>SU2-EAL 2</u>	RBS	39	SU2 #2	Explain why 35 gpm is used instead of 30, which is the TS limit at RBS. Site the specific TS references to justify this deviation (and classify in section correctly.)		X	
5	<u>SU3-EAL 1</u>	ANO	57	<u>SU3 EAL 1</u>	Provide description in Basis, and technical justification as a deviation to NEI 99-01 guidance, for the use of "50% of Control Room annunciators" for Unit 1, versus the definition of "most" as 75% per NEI 99-01 SU3 Basis.			ANO will provide additional information.

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
6	<u>SU3-EAL 1</u>	ANO	58	<u>SU3 EAL 1</u>	Provide a description of the number of Control Room annunciator panels in Unit 2 (ANO-2) and what systems / functions (in general terms) are provided on each panel. In addition, describe how the loss of 9 panels in Units 2 (ANO-2) constitutes a loss of most (75%) of annunciators.			ANO will provide additional information.
7	<u>SU3-EAL 1</u>	ANO	59	<u>SU3 EAL 1</u>	Licensee has chosen to insert the qualifier "Loss of AC and DC" as reason for annunciator loss. Describe what percentage of annunciators are powered by either an AC or DC power source, or combination of both. In addition, describe any credible scenarios, other the loss of AC and DC power, that would resulting a significant loss of Control Room annunciators.			ANO will provide additional information.
8	<u>SU3-EAL 2</u> (also in Deviation/Differences document).	GGNS	31	<u>SU3</u>	NEI 99-01 lists 25gpm as the EAL for identified leakage. In the GG basis, 35 gpm is discussed as the minimum limit for detection for unidentified leakage, but is the identified leak rate limit in the EAL. 10 gpm is the unidentified limit. Correct the references in the basis, and justify the deviation for using 35 gpm as the identified leak rate, versus 25 gpm in 99-01. This is listed as a difference instead of a deviation.			GGNS will correct typo and add additional information.
9	<u>SU3</u> <u>SA4</u> <u>SS6</u>	W3	47	<u>SU3</u> <u>SA3</u> <u>SS3</u>	Describe logic for referencing Reg. Guide 1.97, rather than listing specific Control Room indicator panels containing safety system instrumentation per Table 3 to Reg. Guide 1.97. In addition, clarify how operators are trained to promptly recognize and quantify a loss of Reg. Guide 1.97 instrumentation or if specific measures are in place to			W3 to research in more detail and add additional information as applicable.

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					label instrumentation to allow for the prompt classification of event.			
10	<u>SU4</u>	GGNS	7	EAL SU4 Dev/Diff document	Deviation appears justified, however, NEI 99-01 still lists the 10 gpm limit in the EAL, which could be observed in some situations using remotely installed equipment (as in refueling outages). Recommend that the 10 gpm be left in, and the inclusion of level also included. Additional justification is necessary for the omission of the 10 gpm. Identification of A0" A is missing from the discussion. Is 0" at the reactor head flange? Compare to other Entergy plant EALs.		X	No practicable way to measure
11	<u>SU5</u> <u>CU1</u>	W3	48	<u>SU7</u> <u>CU1</u>	Provide justification for Basis statement, "[a]t Waterford 3, steam generator leakage is considered to be identified leakage." In addition, clarify why this statement would also not be applicable during cold shutdown mode per CU1.			W3 to modify statement
12	<u>SU8-EAL 2</u> <u>CU8-EAL 2</u>	ANO	60	<u>SU8</u> <u>EAL 1</u> <u>CU8</u> <u>EAL 1</u>	Describe in Basis the rational for Unit 1 (ANO-1) and Unit 2 (ANO-2) EAL thresholds established by licensee, and justification for inclusion of site-specific thresholds for inadvertent criticality in SU8 (Modes 3 / 4), but not under CU8 (Modes 5 / 6).			ANO to add additional information.
13	<u>SU8</u> <u>CU8</u>	W3	49	<u>SU10</u> <u>CU7</u>	Clarify use of terms "extended" vs. "sustained" for consistency with EAL thresholds and use of terms in licensee SU10 and CU7 Bases.			W3 to clarify wording.
14	<u>SU9</u>	GGNS	10	SU 9 Dev/Diff document	Justify the deviation (not difference) for including modes 1, 2, and 3 in this IC. Note NEI 99-01 wording, in that fuel clad degradation is not considered a precursor because of the mode 4 or 5 condition, and if the			GGNS to separate cold shutdown EALs

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					mode were 1, 2, 3, different considerations would be present.			
15	SU10	GGNS	9	SU10	Justify the deviation (not difference) for including modes 1, 2, and 3 in this IC. Note NEI 99-01 wording, in that fuel clad degradation is not considered a precursor because of the mode 4 or 5 condition, and if the mode were 1, 2, 3, different considerations would be present.			GGNS to separate cold shutdown EALs
16	<u>SA2-EAL 1</u>	ANO	61	<u>SA2 EAL 1</u>	Licensee has revised EAL wording in EAL Basis (Attachment 3) to include qualifier "...and a successful manual trip <u>or DSS trip</u> occurred." This change is not consistent with NEI 99-01 guidance, nor the wording contained in EAL Matrix (Attachment 2). Resolve inconsistency between EAL Matrix and Basis, and if retained, identify change as a deviation and provide justification to support revision to NEI 99-01 guidance.		X	ANO Add additional information
17	<u>SA2-EAL 1</u>	ANO	62	<u>SA2 EAL 1</u>	Under examples of what constitutes a "manual trip", licensee inserted example: "de-energizing rod drive mechanism". Clarify that, based on NEI 99-01 guidance, the rod drive mechanism can be de-energized from main control rod panels, and does not require action in other adjacent Control Room auxiliary (side or back) panels (i.e., pulling fuses) or actions outside of control room, which are not to be considered under a manual scram.			ANO to provide additional information
18	<u>SA2</u>	W3	50	<u>SA2</u>	Clarify whether rod withdrawal would occur in hot standby (Mode 3), as part of a plant start-up, prior to entering Mode 2. If rod withdrawal would initiate in hot standby, prior to entering Mode 2 (Start-up), then			W3 to clarify wording.

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					address Mode 3 applicability per NEI 99-01 guidance.			
19	<u>SA2</u>	W3	51	<u>SA2 Basis</u>	Intent of the NEI 99-01 IC is to address the failure of an automatic shutdown, whenever an automatic reactor trip is initiated. While steam generator high level per the Waterford 3 Technical Specifications does not correspond to a safety limit, its functional capability at the specified trip setting is required to enhance the overall reliability of the Reactor Protection System (RPS), and therefore, should be applicable to this IC. This is also applicable to RCS flow-low. Provide further justification why not to address the failure to initiate or complete a reactor trip whenever any automatic reactor trip signal is initiated which would potentially create an Anticipated Transient Without Scram (ATWS) event, or provide change to comply with intent of NEI 99-01 guidance.			W3 o modify wording
20	<u>SA3</u> (also in Deviation/Differences document).	GGNS	32	<u>SA3</u>	In the basis, the allowance for ARI as one of the successful means for a manual scram is referenced. Discuss the ability (in terms of time and operator actions (ie. Manual actions or control room actions) to use ARI as a means to rapidly@ manually shut down the reactor.			GGNS to supply reviewer with additional information.
21	<u>SA4-EAL 1)</u>	ANO	63	<u>SA4 EAL 1</u>	Define what constitutes a loss of most or all <u>indicators</u> , consistent with licensee's SU3-EAL 2, or identify as a deviation and provide justification from NEI 99-01 guidance.			ANO to provide additional information.
22	<u>SA4-EAL 1</u>	ANO	64	<u>SA4 EAL 1</u>	Licensee uses term "Plant Transient", which is defined differently than a "Significant Transient" per Sections 4.34 and 4.39, and NEI 99-01,			ANO to provide additional explanation.

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					Section 5.4. Please identify as deviation or difference, as appropriate, and provide technical justification supporting change from NEI 99-01 guidance regarding a "Significant Transient", or provide proposed change to comply with NEI 99-01 guidance.			
23	<u>SS1-EAL 1</u>	RBS	40	SS1 #1	EAL for status of EDGs is missing from this IC. Provide EAL consistent with 99-01 or justify why this EAL is omitted.			RBS to provide additional reference to diesel generator.
24	<u>SS3-EAL 1</u>	RBS	41	SS3 #1	Modes are different than in 99-01. Explain this deviation from 99-01.			RBS to provide justification for hot shutdown in deviation document.
25	<u>SS3</u>	GGNS	33	<u>SS3</u>	In NEI 99-01 Basis discussion of SS3, there is a specific reference to operator actions away from the reactor control console which define a NOT SUCCESSFUL manual shutdown. That specific caution is missing from the GG Basis. Justify the omission of the caution, or correct the Basis to specifically include the caution. As in item 32, justify the use of ARI as A rapid@ insertion of rods.			GGNS to provide additional wording in basis document.
26	<u>SS3-EAL 1</u> <u>CU7-EAL 1</u>	ANO	65	<u>SS3 EAL 1</u> <u>CU7 EAL 1</u>	Describe rational for listing of unit-specific busses in SS3 (Modes 1_4), but not in CU7 (Modes 5 / 6). In addition, confirm that nomenclature for Unit 1 (ANO-1) DC busses is D01 and D02, versus use of unit designator <u>1</u> D01 and <u>2</u> D02.			ANO will provide additional information.
27	<u>SS4</u>	GGNS	13	SS4 Dev/Diff document	Additional justification for RVP levels and their representations, to compare with NEI 99-01 levels. Is A not established@ a typo in SS4 EAL #2, as NEI 99-01 CS4, EAL #2 is A established @.			GGNS will provide additional justification and will coordinate response with RBS.

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
					No EAL for sump/tank levels or for source range monitor increases. Justify deviation for not including in EAL.			
28	<u>SS4-EAL 1</u>	ANO	66	<u>SS4 EAL 1</u>	While not required per NEI 99-01 guidance, licensee has chosen to insert specific system availability to provide core cooling and heat sink. Describe in Basis rational for the selection of Criteria 1.a, 1.b and 1.c.			ANO will provide additional information.
29	<u>SS4 / EAL 1</u>	W3	53	<u>SS5 EALs 1 and 2</u>	Licensee inserted qualifier, "...necessary to reach Hot Shutdown", in IC statement. However, per NEI 99-01 Basis and licensee criteria provided, this IC reflects capabilities to reach or maintain hot shutdown. Revise licensee proposed IC statement to reflect intent of NEI 99-01 guidance.			W3 will modify wording.
30	SS6, EAL #1	GGNS	34	SS6 EAL #1	Use of word A unplanned@ appears to indicate that if planned, this would be acceptable. Provide detailed justification why this deviation is acceptable, as written.			GGNS will modify wording.
31	SS6	ANO	67	SS6	Licensee uses term "Transient" in IC and EAL 1.d, which is not consistent with the use of "Plant Transient" by licensee in SA4 or the use of term "Significant Transient" under NEI 99-01 guidance. Identify as deviation or difference, as appropriate, and provide technical justification supporting change from NEI 99-01 guidance and inconsistency with SA4, or provide proposed change to comply with NEI 99-01 guidance.			ANO clarify wording .
32	<u>SS6-EAL 1.c</u>	ANO	68	<u>SS6 EAL 1.c</u>	NEI 99-01 criterion states, "Indications needed to monitor (site-specific) safety functions are unavailable". However, licensee has established a threshold of a "loss of			ANO to provide further evaluation.

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action	
					75% of indicators associated with safety systems." This is not consistent with NEI 99-01 guidance, which is intended to reflect that indication is not available to monitor a listing of site-specific safety functions. Identify as a deviation or difference, as appropriate, and provide justification supporting changes and listing of site-specific safety functions, or provide proposed changes to comply with NEI 99-01 guidance.				
33	<u>SS6 / EAL 1.c</u>	W3	52	<u>SS3</u>	NEI 99-01 does not require that all Reg. Guide 1.97 indication be lost as reflected in licensee EAL criteria, but rather that indication is not available to monitor a required safety function(s). Provide further justification or change to comply with NEI 99-01 guidance.			W3 to modify wording and coordinate with ANO.	
34	<u>SG1-EAL 1.b</u>	ANO	69	<u>SG1 EAL 1.b</u>	NEI 99-01 guidance states, "Site-specific) indication of continuing degradation of core cooling based on Fission Product Barrier monitoring." Licensee has designated criterion, "FA1 entry conditions met." Designate Fuel Clad Barrier criteria from Fission Product Barrier Matrix, contained in Attachment 2, which specifically indicate a continuing degradation of core cooling.	X			
35	<u>SG1-EAL 1</u>	RBS	42	SG1 #1	No reference for EDGs. If EDGs are operable, then busses would be powered. Provide justification using site drawings and electrical logic diagrams to discuss the power-related EALs.			RBS to add reference to diesel generator.	
36	SG2 (also in Deviation/Differences document).	GGNS	35	<u>SG2</u>	As in item 32, justify the use of ARI as A rapid@ insertion of rods. ??		X		

	NEI 99-01	Site	Number	Site EAL number	Question	NRC Clarify	Discuss	Entergy Action
37	<u>SG2-EAL 1.a</u>	ANO	70	<u>SG2 EAL 1.a</u>	Describe the correlation and technical basis between the unit-specific thresholds indicating core cooling is extremely challenged (EAL 1.a), with the NEI 99-01 Basis guidance of "core exit temperatures are at or approaching 1200 degrees or that the reactor vessel water level is below the top of active fuel."			ANO to evaluate further and provide consistency.
38	<u>SG2-EAL 1.b</u>	ANO	71	<u>SG2 EAL 1.b</u>	<i>Describe the correlation and technical basis between the thresholds indicating heat removal is extremely challenged (EAL 1.b), with the NEI 99-01 Basis guidance of "emergency feedwater flow is insufficient to remove the amount of heat required by design from at least one steam generator."</i>		X	
39	<u>SG2 / EAL 1.b</u>	W3	54	<u>SG2-EAL 2</u>	<i>NEI 99-01 Basis guidance and that provided in licensee Basis state that an indication that heat removal is extremely challenged is "if emergency feedwater flow is insufficient to remove the amount of heat required by design from at least one steam generator." However, licensee EAL criterion 2 states that "heat removal is extremely challenges by BOTH steam generators < 50% Wide Range <u>and</u> not feedwater available." Clarify inconsistency between licensee EAL criterion and justification in NEI 99-01 and licensee Bases, or provide changes to EAL criterion to comply with NEI 99-01 guidance.</i>		X	