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June 6, 2009
JAFP-09-0072

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555-0001

**Subject: Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
License No. DPR-59**

**James A. FitzPatrick Nuclear Power Plant – Response to Request For
Additional Information Regarding: Emergency License Amendment
Request Application for Technical Specification 3.8.1 Required
Action B.4 Completion Time (TAC No. ME1404)**

- References: 1) Entergy Letter, JAFP-09-0070, Emergency License Amendment Request Application for Technical Specification 3.8.1 Required Action B.4 Completion Time, dated June 4, 2009.
- 2) NRC Request for Additional Information provided by the NRC Staff via Conference Call, June 5, 2009

Dear Sir or Madam:

Entergy Nuclear Operations, Inc. (ENO), as operator of the James A. FitzPatrick Nuclear Power Plant (JAF), hereby submits this response to the NRC's Request for Additional Information (RAI)(Reference 2) regarding the Emergency License Amendment Request Application for Technical Specification 3.8.1 Required Action B.4 Completion Time (Reference 1).

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Attachment 1 contains the responses to NRC Electrical Engineering Branch questions 1 through 4. Attachment 2 contains the responses to NRC PRA Branch questions 1 - 7

The commitments made in this letter are summarized in Attachment 3.

This letter does not affect the "No Significant Hazards" determination made in Reference 1.

Should you have any questions concerning this letter, please contact Mr. Joseph Pechacek, Licensing Manager, at (315) 349-6766.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 6th day of June, 2009.

Respectfully,


Director, Nuclear Safety Assurance
Pete Dietrich
Site Vice President

Attachments:

1. Response to NRC Electrical Engineering Branch RAI Questions 1 - 4
2. Response to NRC Probabilistic Risk Assessment Branch RAI Questions 1 - 7
3. List of Commitments

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cc:

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ATTACHMENT 1 to JAFP-09-0072

**Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant**

**Responses to NRC Electrical Engineering Branch
RAI Questions 1 - 4**

ATTACHMENT 1 to JAFP-09-0072

RAI Question:

- 1) In accordance with 10 CFR 50.91(a)(5), licensees that submit a request for an emergency license amendment must explain why the emergency situation occurred and why it could not avoid the situation. Provide a detailed discussion on the basis for the emergency Technical Specification amendment request, particularly how it could not have been avoided and why an exigent or normal amendment request could not be processed.

Response:

In accordance with 10 CFR 50.91(a)(5) Entergy has requested a one-time allowance to increase a Technical Specification LCO 3.8.1 Required Action B.4 from "14 days AND 21 days from discovery of failure to meet LCO" to "17 days AND 21 days from discovery of failure to meet LCO."

LCO 3.8.1 Condition B was entered at 1015 on May 26, 2009, in order to perform scheduled maintenance on Emergency Diesel Generator (EDG) 93EDG-C. This EDG is paired with 93EDG-A to form one of two redundant EDG subsystems. At the time the LCO Condition was entered there was no indication of problem with 93EDG-C. The surveillance tests to demonstrate Operability were current and the last performance of the insulation resistance test (meggering) Preventive Maintenance (PM) task had results that were in the acceptable range with adequate margin.

At approximately 0100 on May 28, 2009, a low megger reading was identified during performance of the 2-year PM to perform insulation resistance testing on the 93EDG-C rotor. At that time the issue was entered into the corrective action program and efforts to define the problem and the scope of repair commenced.

With support from vendor personnel the 93EDG-C rotor was removed on May 29, 2009 and inspected. Based on the results of the inspection the rotor was transported to the vendor's repair facility for further testing and inspection. As a result of the activities at the vendor's facility on May 31, 2009 it was determined that one of the eight poles on the rotor was shorted and would have to be rewound. Once the scope of the repair was understood a preliminary schedule was prepared that indicated completion of the repair activity might challenge the ability of the plant staff to complete the restoration and testing within the 14 day completion time allowed by the LCO. On June 2, 2009 a draft amendment request was discussed with NRC Staff and a submittal formally requesting the extension was filed on June 4, 2009. During this time work on the repair of the 93EDG-C rotor has continued on a round-the-clock basis.

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Since Entergy had no reason to expect an emergent failure of the rotor, no Technical Specification amendment was requested in advance. As a consequence neither the routine amendment processing time, which includes a 30 day public comment period, nor the exigent amendment processing time, which includes a 14 day public comment period, support a decision prior to the expiration of the current Required Action B.4 Completion Time, on June 9, 2009.

Based on this review Entergy believes that the criteria in 10 CFR 50.91(a)(5) regarding an emergency that could not be avoided by the licensee is met and that processing the requested amendment on an emergency basis is warranted.

RAI Question:

- 2) With regard to staging a 1500 kilo-watt (kW), 4160 volt temporary diesel generator (DG)
 - a) Provide the basis for selecting a 1500 kW DG.
 - b) Describe the time and actions required for the temporary DG to power the safety bus. Document the time period and required actions as an additional compensatory measure.
 - c) Provide a detailed discussion on the procedures that will be available for connecting and operating the temporary DG. Also describe how the operations staff will be trained on these procedures.
 - d) Describe the fuel oil requirements for the temporary DG. 3. At a minimum, there must be adequate fuel oil available for the temporary DG to operate continuously at rated load for the duration of the extended allowed outage time (AOT).

Response:

- a) A 1500 kW diesel generator allows mitigation of a Station Blackout Event (SBO) following a total loss of offsite and onsite AC power by providing a pre-staged source of AC power that can be connected to one of the station's emergency buses. This power source is capable of powering the 125volt battery charger, a Residual Heat Removal (RHR) pump along with a Residual Heat Removal Service Water (RHRSW) pump and sufficient 600 V loads to support their operation. This complement of pumps is sufficient to provide core and containment cooling in the absence of large break loss-of-coolant-accidents affecting the Reactor Water Recirculation system. Connection of the 1500 kW diesel generator to an emergency bus effectively terminates the

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SBO by providing AC power for the station. Instructions for connection of the power source are contained with Technical Support Guidelines that support the Severe Accident Operating Guidelines. Connection of this power source can be accomplished within the 4 hour coping period for the SBO.

- b) Severe Accident Management Technical Support Guideline TSG-13, Temporary Installation Instruction for TSG Diesel Generator, has been developed to provide instructions for installation of the temporary diesel generator. The generator will be pre-staged near the Turbine Building Track bay. Electrical maintenance and operations personnel would be tasked with powering the 10500 bus using the TSG. The actions required to power the safety bus consist of the following:
- Route staged output cable from the diesel to the 10500 bus.
 - Open and rack out all breakers on the 10500 bus, except the feeder to the safety-related 600 volt switchgear.
 - Strip non-essential loads from the safety-related 600 volt switchgear by opening breakers at the switchgear.
 - De-energize 'A' residual heat removal logic to prevent inadvertent RHR pump start, by removing two 120VAC fuses.
 - Install pre-staged ground cart into 10500 bus breaker cubicle and connect cables to temporary diesel generator.
 - Start the temporary diesel generator per temporary operating procedure (TOP) 382.
 - Check phase rotation of temporary diesel by running an emergency pump room exhaust fan.

Temporary operating procedure TOP-382, TSG Diesel Generator, provides instructions to the operator for startup, refueling, and shutdown of the diesel generator. Startup consists of opening fuel supply valves, energizing self-contained control power, and placing the control switch to the manual start position. After engine start, the operator checks and adjusts generator voltage and frequency (engine speed) as necessary to establish nominal values. When ready to energize the 10500 bus, the operator closes the diesel generator's output breaker.

A walkthrough of TSG-13 and TOP-382 was performed by a qualified operator and electrician. Based on that walkthrough the time estimate to

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energize the 10500 bus from this power source is approximately 3 hours, well within the 4-hour SBO coping time for the JAF plant. During the period of the extended AOT sufficient electrical maintenance and operations personnel will be onsite to implement this contingency.

- c) Two procedures will be utilized for connecting and operating the temporary diesel generator. TSG-13, Temporary Installation of TSG Diesel Generator is a Severe Accident Management Technical Support Guideline that will be implemented to provide instructions for use of a non-safety related diesel generator to provide power to the 10500 bus. The procedural actions to accomplish this task are described above. For operation of the temporary diesel generator, TOP-382 will be implemented to provide instructions for startup, refueling, and shutdown of the diesel generator unit. Training on these procedures will be accomplished by review of a presentation and walkthrough of the procedures. Training will be completed prior to implementing the amendment or prior to the affected crews assuming the shift following implementation of the amendment.
- d) The temporary diesel consumes 109 gallons per hour of fuel at rated load with a fuel tank capacity 950 gallons providing approximately 8.5 hours of operation. Equipment has been pre-staged and instructions provided to the plant operators to transfer fuel from the existing emergency diesel fuel oil tanks (128,000 gallons minimum capacity) to the temporary diesel while the diesel is in operation. The on site fuel oil supply provides for extended operation of the temporary diesel beyond the three day period of the extended AOT.

RAI Question:

- 3) With regard to the failed rotor, provide a detailed discussion on how common mode failure was ruled out.

Response:

The 93EDG-C Generator Field winding megger reading was 39Kohms at 500 vDC. The field winding has 4 separate windings wired in parallel. Three of the four windings measured approximately 1 Gig Ohms. The fourth winding measured approximately 39Kohms.

The acceptance criterion for the EDG field winding is:

Minimum of 2.0 for the PI

OR

Minimum of 5.2 Megohms insulation resistance (temperature corrected)

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The following table provides the last three megger readings for each EDG.

EDG Generator Field Winding Megger readings							
93EDG-A		93EDG-B		93EDG-C		93EDG-D	
Date	Megohms	Date	Megohms	Date	Megohms	Date	Megohms
06/2003	3075	11/2005	2512	02/2004	4388	02/2004	3077
12/2005	2750	05/2007	1947	06/2005	500	10/2005	6944
04/2008	3316	05/2009	2558	09/2007	657	01/2008	1555

A review of the data, in the table above, indicates that while 93EDG-C megger readings were lower than the other EDGs, and had changed over time, they remained significantly above the minimum acceptance criteria. 93EDG-A, 93EDG-B and 93EDG-D have remained relatively stable and all above 1000 Megohms. 93EDG-B was tested 2 weeks ago.

Also, the Field Winding Polarization Index (PI) is measured during the preventive maintenance of the EDGs. The PI is used in conjunction with the insulation resistance reading to determine the condition of the field winding.

The following table provides the last three measurements of the PI for each EDG.

EDG Polarization Index							
93EDG-A		93EDG-B		93EDG-C		93EDG-D	
Date	PI	Date	PI	Date	PI	Date	PI
06/2003	3.17	11/2005	3.43	02/2004	3.46	02/2004	3.72
12/2005	3.64	05/2007	3.63	06/2005	1.72	10/2005	1.26
04/2008	3.59	05/2009	3.64	09/2007	1.00	01/2008	2.86

Based on a review this data, there is no reason to believe that there is a common failure mode.

RAI Question:

- 4) Consistent with previously NRC approved DG AOT extension requests; the staff the licensee must supplement its list of compensatory measures with the following:

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- a) The licensee must verify the capability of temporary DG to perform its intended function. The temporary DG shall be verified available every 8 hours and treated as protected equipment.
- b) The system load dispatcher will be contacted once per day to ensure no significant grid perturbations are expected during the extended AOT. Also, the system load dispatcher should inform the plant operator if conditions change during the extended AOT (e.g., when the predicted voltages would be unacceptable as a result of a trip of the nuclear unit).
- c) No elective switchyard maintenance will be allowed.

Response:

- a) As part of the receipt and staging of the temporary diesel generator the machine will be started and it will be verified that the engine comes up to speed and that the generator develops the required voltage. The operations department will periodically (every 8 hours) verify that the generator is properly staged and that the guidance necessary to connect it to the emergency bus is available at the machine. This requirement is identified in Attachment 3 as a commitment.
- b) Compensatory action 10 in Entergy's amendment request is amended by this response to include notification of changes in grid conditions. This is identified in Attachment 3 as a commitment.
- c) The list of protected equipment shown in compensatory action 1, in Entergy's amendment request, is amended by this response to include the 115 kV switchyard. This is identified in Attachment 3 as a commitment.

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**Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant**

**Responses to NRC Probabilistic Risk Assessment Branch
RAI Questions 1 – 7**

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RAI Question:

- 1) The licensee needs to justify that the risk results for internal events is not adversely impacted by any plant changes not yet incorporated into the model; i.e., modifications or relevant procedure changes.

Response:

The JAF PRA Model (Rev 4) includes plant configuration and procedure changes through refueling outage RFO-18 (September 2008). Additionally, the completed modifications and procedure changes since RFO-18 have been reviewed and do not adversely affect the JAF PRA model.

RAI Question:

- 2) The licensee needs to justify that no significant plant changes since the IPEEE would result in substantial change in the fire risk insights applicable to this proposed application.

Response:

Changes to the plant configuration and procedures since completion of the Individual Plant Examination of External Events (IPEEE) would tend to reduce the CDF associated with fire risk. This is evidenced by the major changes identified below and by the reduction in the internal events CDF since the original JAF IPEEE submittal.

Changes were made to the PRA model to reflect design and procedure modifications subsequent to the original JAF IPEEE submittal.

These changes include the following:

- Service, instrument, and breathing air compressors were replaced.
- Operators are directed to maximize Control Rod Drive flow in certain accident sequences.
- Installed a Safety Relief Valve (SRV) electric lift system, providing an alternate means of actuating the SRVs.
- A new procedure (EP-10) directs operators to align the fire protection system to the tube side of the RHR heat exchanger in loss of containment heat removal accident sequences.
- Station blackout procedures were revised to explicitly address bus recovery.

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- Provided a back-up battery charger that can be aligned to either station battery.
- Proceduralized RCIC operation without DC power.
- Proceduralized starting EDG without DC power, as well as field flashing without station batteries.

RAI Question:

- 3) The licensee needs to identify its assumptions regarding unavailability of other PRA modeled equipment in its risk calculations, and specifically identify if any credit is taken for the risk management actions, including the temporary diesel generator.

Response:

As discussed in the Entergy amendment application, the PRA results are based on the average maintenance unavailability model. No adjustments were made to the results. Therefore, cutsets involving 93EDG-C out of service concurrently with maintenance on other EDGs (or any other component) were retained in the results. The results are considered conservative because the other three remaining EDGs will remain in service until 93EDG-C is returned to service. In addition, no credit was taken for any compensatory measures, including use of the temporary diesel generator.

RAI Question:

- 4) The licensee needs to provide its assessment of the impact of dominant fire CDF sequences on LERF.

Response:

The original IPEEE did not require an estimate for LERF. Instead, the IPEEE examined potential containment bypass and containment isolation accident scenarios caused by plant fires. The associated impact on LERF from the dominant fire zones impacted by 93EDG-C out of service is evaluated below. The evaluated fire zones are: CT-2 (East Cable Tunnel), EG-6 (Emergency Diesel Switchgear Room, and BR-4 (Train B Battery Charger Room).

The potential large early release impact consisted of binning the top 95 percent cutsets for each of the dominant fire zones (CT-2, EG-6, and BR-4) into the

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appropriate core damage accident class (as defined in the JAF PRA revision 4 model). The binning was performed on the original cutsets (with 93EDG-C available) and the modified cutsets (with 93EDG-C out-of-service). The examination identified an increase in those core damage accident class associated with a station blackout. The corresponding increase in conditional large early release probability (CLERP) was estimated to be a 10 percent increase from the original value. The results are presented below:

Core Damage Accident Class	Core Damage Accident Class Description	CLERP with 93EDG-C Available	CLERP with 93EDG-C Out -of-Service
Class IA	Transients events with core damage at high reactor vessel pressure	8.12E-07	8.42E-07
Class IBE	Short-term plant station blackout	9.38E-06	7.42E-05
Class IBL	Long-term plant station blackout	9.23E-07	8.63E-06
Class ID	Transients events with core damage at low reactor vessel pressure	8.42E-04	8.53E-04
Class IIV	Transients with loss of containment decay heat removal	0.00E+00	0.00E+00
Class IVA	ATWS events	5.30E-06	5.29E-06
Total		8.58E-04	9.42E-04

RAI Question:

- 5) The licensee needs to be more specific in its commitment to availability of protected plant equipment during the extended EDG outage (risk management action #1). The prohibition on "non-routine work activities" is too vague - licensee should commit to not voluntarily remove this equipment from service.

Response:

Attachment 3 of this submittal formalizes the compensatory measures in Entergy's amendment application as licensee commitments. The first commitment specifies that no equipment in the protected equipment list will be voluntarily removed from service during the period of the extended AOT.

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RAI Question:

- 6) The licensee needs to provide a formal commitment for all its identified risk management actions.

Response:

Attachment 3 of this submittal formalizes the compensatory measures, identified in the Entergy amendment application, as licensee commitments. That list of commitments also includes those additional commitments and clarifications required by these RAIs.

RAI Question:

- 7) Please provide additional details on exactly how the licensee justifies that the gap assessment using RG 1.200 and the internal events PRA standard, conducted at other similar facilities, is directly applicable to the JAF PRA model.

Response:

The JAF PRA model (Rev. 4) was developed by the same team of Entergy PRA analysts that developed both the Vermont Yankee (VY) and Pilgrim (PNPS) PRA models. The same guidance and methodology used to develop the VY and PNPS PRA models were employed on the JAF PRA Model. The VY and PNPS PRA models were peer reviewed to Regulatory Guide 1.200 requirements under the BWROG program in November 2007 and June 2008. Given that the same methodology and personnel were used on all three PRA models, it is reasonable to expect that the Facts and Observations (F&Os) from both the VY and PNPS peer reviews would be relevant to the JAF model. As a result, those F&Os were reviewed and evaluated as potential gaps and applied to the JAF PRA model update, by entering them into the Entergy Model Change Request (MCR) data base. The responsible Entergy PRA analyst incorporated or resolved the potential gaps during the development of the JAF model update.

In addition to evaluating the VY and PNPS F&Os for applicability to JAF, an additional self-assessment was performed of the JAF PRA model against the Regulatory Guide 1.200 to identify any 'gaps' that remained after addressing the VY and PNPS RG 1.200 Peer Review team F&Os.

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**Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant**

List of Commitments

ATTACHMENT 3 to JAFP-09-0072

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

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
<p>The following equipment will be protected in accordance with the plant Protected Equipment Program AP-12.12, during the period of extended AOT for 93EDG-C. The Protected Equipment Program requirements include 1) posting the equipment with signs and barriers to prevent inadvertent operation; 2) no routine / elective work activities on protected equipment, this list of equipment will not be voluntarily removed from service; and 3) Operations Manager approval for any emergent work involving protected equipment.</p> <ul style="list-style-type: none"> ○ Emergency Diesel Generators 93EDG-A, 93EDG-B and 93EDG-D ○ Emergency Service Water Pumps 46P-2A and 46P-2B ○ 4160V Normal and Emergency Switchgear Buses 10300, 10400, 10500 and 10600 ○ Station Batteries 71SB-1 and 71SB-2 ○ Station Battery Chargers 71BC-1 and 71BC-2 ○ 125-Vdc Control boards 71BCB-2A and 71BCB-2B ○ Main Transformers 71T-1A, and 71T-1B ○ Normal Station Service Transformer 71T-4 ○ Reserve Station Service Transformers 71T-2, and 71T-3 ○ North and South 115 kV Bus Reserve Station Service Transformer Disconnect Switches 71EDSC-10015, 71EDSC-10017, and 71EDSC-10025 ○ RHR/RHRSW Loops "A" & "B" ○ HPCI pump 23P-1 ○ RCIC pump 13P-1 ○ Torus vent valves 27AOV-117 and 27AOV-118 ○ Diesel Driven Fire Pump 76P-1 ○ Diesel Driven Fire Pump 76P-4 ○ 115 kV Switchyard 	X		Prior to entering the period of extended AOT and maintained for the duration of the extended AOT.
Transfer non-vital loads from the "A" emergency bus to the "B" emergency bus to reduce the "A" bus loading to within the short time capacity of 93EDG-A.	X		Prior to entering the period of extended AOT and maintained for the duration of the extended AOT.

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COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Stage a 1500 kW, 4160v temporary diesel generator on-site as a back-up power supply. This power supply will be available to be connected to a vital bus in the event of a Station Blackout, should the plant AOP strategies for restoring power be unsuccessful. Appropriate guidance for using this equipment will be in place prior to entering the extended AOT period.	X		Prior to entering the period of extended AOT and maintained for the duration of the extended AOT.
Increased administrative control will be exercised for any proposed hot work in the vicinity of protected equipment and in the impacted fire zones (CT-2 (East Cable Tunnel), EG-6 (Emergency Diesel Switchgear Room), and BR-4 (Train B Battery Charger Room)).	X		Prior to entering the period of extended AOT and maintained for the duration of the extended AOT.
No planned maintenance on fire detection or fire suppression equipment that will cause the fire detection or fire suppression equipment in the impacted fire zones (CT-2 (East Cable Tunnel), EG-6 (Emergency Diesel Switchgear Room), and BR-4 (Train B Battery Charger Room)) to be inoperable.	X		For the duration of the extended AOT.
Transient combustible loading in these areas (CT-2 (East Cable Tunnel), EG-6 (Emergency Diesel Switchgear Room), and BR-4 (Train B Battery Charger Room) EDG Rooms) will be reviewed and any unnecessary transient combustibles will be removed.	X		Prior to entering the period of extended AOT and maintained for the duration of the extended AOT.
If an equipment failure occurs that affects the protected equipment noted above, the applicable Technical Specification Conditions will be entered, and Senior Plant management will be notified.	X		Prior to entering the period of extended AOT and maintained for the duration of the extended AOT.
Maintenance and surveillance activities which could lead to Main Turbine trip will be avoided.	X		For the duration of the extended AOT.
The plant Operations crew and Maintenance staff will be briefed on these risk management measures.	X		Prior to entering the period of extended AOT and maintained for the duration of the extended AOT.
The system load dispatcher will be contacted once per day to ensure no significant grid perturbations are expected during the extended AOT. Also, the system load dispatcher should inform the plant operator if conditions change during the extended AOT (e.g., when the predicted voltages would be unacceptable as a result of a trip of the nuclear unit).	X		For the duration of the extended AOT.

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COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Just-in-time training will be provided to the operating shifts to heighten their awareness of challenges to the electrical distribution system in this configuration. This will include review of electrical distribution related AOPs, AOP-28, TSG-8, and the guidance associated with the temporary diesel generator staged as a compensatory measure.	X		Prior to entering the period of extended AOT and prior to any individual assuming the shift.
Operations will monitor weather conditions to assess potential impacts on plant conditions due to adverse weather conditions.	X		For the duration of the extended AOT
These compensatory measures will be promulgated to the operating crews in an operations department standing order.	X		Prior to entering the period of extended AOT.
The operations department will periodically (every 8 hours) verify that the generator is properly staged and that the guidance necessary to connect it to the emergency bus is available at the machine.	X		Prior to entering the period of extended AOT and maintained for the duration of the extended AOT.