

**From:** Vaidya, Bhalchandra  
**Sent:** Monday, August 23, 2010 9:37 AM  
**To:** 'Dorman, Eugene'; 'Pechacek, Joseph'; 'pcullin@entergy.com'  
**Cc:** Wengert, Thomas; Singal, Balwant; Salgado, Nancy; Anderson, Joseph; Murray, Charles; Johnson, Don  
**Subject:** ME3787- DRAFT Request for Additional Information (RAIs) RE: EAL Scheme Changes

**SUBJECT:** James A. FitzPatrick Nuclear Power Plant (JAFNPP) – Emergency Action Level Scheme Changes - Request for NRC Review and Approval. (TAC NO. ME3787)

By letter dated April 8, 2010, Energy Nuclear Operations, Inc., the licensee, pursuant to 10 CFR Part 50, Appendix E (IV)(B)(1), submitted the proposed changes to JAFNPP EAL Scheme for the NRC Review and Approval.

The staff of NRC, the Office of Nuclear Security Incidence Response (NSIR), Division of Preparedness and Response, Operating Reactor Licensing and Outreach Branch has reviewed the information provided by Entergy Nuclear Operations Inc. and determined that additional information is needed to complete our review. The request for the DRAFT RAI is described below:

RAI #	EAL	Question
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RAI #	EAL	Question
1	GENERAL	<ol style="list-style-type: none"> <li>1. Due to recurring issues within the industry, please confirm that all stated values, set points, and indications provided are within the calibrated range of the applicable instrumentation and that the instrumentation is appropriate for the EAL.</li> <li>2. Provide justification for inconsistencies in Initiating Condition/EAL identification scheme on the JAFNPP-to-NEI 99-01 Cross-Reference Table with NEI guidance document, or revise identification scheme accordingly consistent with endorsed guidance: <ol style="list-style-type: none"> <li>a. AU1.2 (Licensee) is actually from AU1.2 (NEI).</li> <li>b. AA1.2 (licensee) is actually AA1.2 (NEI).</li> <li>c. AA2.1 (licensee) is actually AA2.2 (NEI).</li> <li>d. AA2.2 (licensee) is actually AA2.1 (NEI).</li> <li>e. There is no CU5 in NEI 99-01 Rev. 5.</li> <li>f. CA3.1 (licensee) references CA4.3 (NEI) yet there is no CA4.3 in NEI 99-01 Rev. 5.</li> <li>g. CS2.3 (licensee) references CS1.3 (NEI) yet there is no CS1.3 in NEI 99-01 Rev. 5.</li> <li>h. CG2.1 (licensee) is actually only from CG1.1 (NEI).</li> <li>i. CG2.2 (licensee) is actually only from CG1.2 (NEI)</li> <li>j. HU1.3 (licensee) is actually HU1.4 (NEI).</li> <li>k. HU1.4 (licensee) is actually HU1.3 (NEI).</li> <li>l. HU1.5 (licensee) is actually HU1.5 (NEI).</li> <li>m. HU2.2 (licensee) is actually HU2.2 (NEI).</li> <li>n. HA1.3 (licensee) is actually HA1.5 (NEI).</li> <li>o. HA1.5 (licensee) is actually HA1.3 (NEI).</li> <li>p. HA4.1 (licensee) is actually HA4.1 and HA4.2 (NEI).</li> <li>q. SU2.1 (licensee) is actually SU8.1 (NEI).</li> <li>r. SA4.1 (licensee) references SA4.1 and SA4.2 (NEI) yet there is no SA4.2 in NEI 99-01 Rev. 5.</li> </ol> </li> <li>3. Please provide a copy of EAL flowchart (user aid) for staff comparison against EAL document and technical basis to ensure consistency.</li> </ol>
2	AU1.2 AA1.2	Please provide documentation to support that the values "2 (200) X HIGH ALARM" are within the calibrated range of the applicable instrumentation.
3	AA1.1	Explain the resolution for the stated indicators to ensure ability to read accurately on a typical logarithmic scale for identified thresholds.

RAI #	EAL	Question
4	CU2.2 CU2.3 SU4.2	Initiating Condition lists “RCS Leakage,” which is inconsistent with endorsed guidance that lists Initiating Condition as “Unplanned Loss of RCS/RPV Inventory.” Please provide further justification for this inconsistency, or revise accordingly per endorsed guidance.
5	CU4.1 SU4.2	Please explain how the “Offsite Radio Systems” can be used to communicate with the NRC, or revise accordingly.
6	HA1.1	EAL requires either confirmation seismic event greater than an operating basis earthquake (OBE) by either Nine Mile Point (NMP) 2 seismic instrumentation or analysis of JAFNPP seismic instrumentation. Please provide further information supporting ability to perform analysis of JAFNPP seismic instrumentation in a timely manner using available shift staffing. In addition, what procedures are in place to ensure NMP-2 seismic instrumentation is available for event declaration?
7	HS5.1	Endorsed guidance states that the site-specific time for transfer of control should not exceed 15 minutes without additional justification. Please provide additional analysis or assessments as to how quickly control must be reestablished without core uncovering and/or core damage per to justify proposed site-specific value of 30 minutes, or revise accordingly per endorsed guidance.
8	FISSION BARRIER MATRIX	<ol style="list-style-type: none"> <li>1. Endorsed guidance states that site-specific thresholds may be included to indicate a loss or potential loss of fission product barriers. Provide documentation to support conclusion that there are not other site-specific thresholds or indicators for a loss or potential loss of any fission product barrier.</li> <li>2. FC Barrier – Loss 1: The inclusion of “Primary Containment Flooding is required due to any of the following:” is not from the approved guidance. Please justify the deviation or revise accordingly.</li> <li>3. RCS Barrier – Loss 3: The inclusion of “Release pathway exists outside primary containment resulting from isolation failure...” is not from the approved guidance. Please justify the deviation or revise accordingly.</li> </ol>

Please contact me to schedule a non-secured tele-conference to discuss your exemption request in general and these topics in particular and also to obtain a firm commitment for the response to this request.

Bhalchandra K. Vaidya  
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## E-mail Properties

### Mail Envelope Properties ()

Subject: ME3787- DRAFT Request for Additional Information (RAIs) RE: EAL Scheme Changes

Sent Date: 08/23/2010 8:53:10 AM

Received Date: 08/23/2010 9:36:00 AM

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Files	Size	Date & Time
MESSAGE	53139	08/23/2010

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Sensitivity: 0Normal  
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