



Entergy Operations, Inc.
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Jerry C. Roberts
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RBG-47221
RBF1-12-0037

March 22, 2012

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Subject: Response to Request for Additional Information Regarding
Proposed Emergency Plan Change
River Bend Station, Unit 1
Docket No. 50-458
License No. NPF-47

- References:
1. Entergy Letter to NRC dated September 12, 2011, Proposed Emergency Plan Change (RBG-47174)
 2. NRC email to Entergy dated September 28, 2011, Supplemental Information Needed For Acceptance of Requested Emergency Plan Change (TAC NO. ME7181)
 3. Entergy Letter to NRC dated October 13, 2011, Supplemental Information – Proposed Emergency Plan Change – Backup EOF Relocation (RBG-47183)
 4. NRC email to Entergy dated February 24, 2012, Request for Additional Information Regarding Proposed Emergency Plan Change (ME7181)

Dear Sir or Madam:

On September 12, 2011, Entergy Operations, Inc. (Entergy) submitted a request for a change to the Emergency Plan for River Bend Station (RBS), Unit 1. A change is proposed to the Emergency Plan to relocate the backup Emergency Operations Facility (EOF).

The NRC requested additional information on February 24, 2012. Entergy's response to this request is provided in Attachment 1.

There are no new commitments in this letter.

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If you have any questions or require additional information, please contact Joey Clark,
Licensing Manager, at (225) 381-4177.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this
22nd day of March 2012.

Sincerely,



JCR/JAC/KRH

Attachment: Response to Request for Additional Information Regarding Proposed
Emergency Plan Change

cc: U.S. Nuclear Regulatory Commission
Region IV
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Arlington, TX 76011-4511

NRC Resident Inspector
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St. Francisville, LA 70775

Ms. Tracie Lowrey
Public Utility Commission of Texas
1701 N. Congress Ave.
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Attachment 1

Response to Request for Additional Information Regarding
Proposed Emergency Plan Change

Response to Request for Additional Information Regarding Proposed Emergency Plan Change

1. What impact does the relocation of the back-up EOF to 28 miles have on the timeliness of facility staffing and activation, including effective direction and effective control during an emergency?

The River Bend Station (RBS) Emergency Plan defines four categories for an emergency. The discussion of the Alert classification requires the activation of all emergency response facilities; however, the discussion in the Emergency Plan also notes that "it is unlikely that an offsite hazard will be created". Based on the understanding of this classification, the potential need for offsite assistance to immediately contain and mitigate an accident is small. As a conservative position, RBS currently staffs all emergency response facilities at the Alert level which ensures proper staffing of the facilities should conditions degrade to a Site Area Emergency or General Emergency classification.

Staffing: River Bend Station maintains multiple Emergency Response Organization (ERO) teams with one team being on duty/on-call each week. When an emergency is declared, emergency response organization members who have pagers are paged and all ERO members are expected to report to their respective facilities. Personnel who do not carry pagers are called. It is management's expectation that individuals keep their pagers with them at all times and respond to emergencies even when they are not on duty to ensure facilities are staffed as soon as possible.

Command & Control: If circumstances require the relocation of the primary Emergency Operations Facility (EOF) to the backup EOF, the Emergency Plant Manager in the Technical Support Center (TSC) assumes classification and offsite notification responsibilities for the offsite protective action recommendations until the backup EOF is activated. If the TSC is not operational, those duties remain in the main control room with the Operation Shift Manager. During an off-hours hostile action event, all available EOF personnel are trained to proceed directly to the Backup EOF facility upon notification by the emergency response notification system.

Timeliness: The relocation of the backup facility to the proposed location adds 8 - 10 minutes additional travel time for ERO members traveling from the onsite EOF. For events which require ERO members to report directly to the Backup EOF, the additional travel time is about the same. Table 1 displays the local communities where the members of the emergency response organization reside and the distance to the current facility as well as the proposed facility. The augmentation times include 10 minutes for awaking and responding to the page, 15 minutes to dress and prepare, driving time based on adherence to posted speed limits and time to ingress from the parking lot to the facility. Based on this table, the proposed Backup EOF can become operational within the 90-minute goal set for the onsite Emergency Operations Facility. Therefore, the relocation of the Backup EOF will not adversely affect the timeliness of staffing the facility.

Table 1
Typical Response Time to Proposed Backup EOF

Community	% of EOF Personnel in Community*	Current Backup EOF Location**		Augmentation Time	Proposed Location**		Augmentation Time	Delta (min.)
		Distance	Travel Time		Distance	Travel Time		
St. Francisville	23	31 miles	39 min.	64 min	37 miles	45 min.	70 min	+6 min.
Jackson	2	35 miles	47 min.	72 min	40 miles	53 min.	78 min	+6 min.
Zachary	2	20 miles	28 min.	53 min	26 miles	34 min.	59 min	+6 min.
Baker	2	11 miles	21 min.	46 min	18 miles	26 min.	51 min	+5 min.
Slaughter	2	25 miles	33 min.	58 min	30 miles	39 min.	64 min	+6 min.
Port Allen	1	< 10 miles	10 min.	35 min	10 miles	13 min.	38 min	+3 min.
Baton Rouge	26	< 10 miles	15 min.	40 min	< 10 miles	15 min.	40 min	0 min.
New Roads	3	34 miles	45 min.	70 min	39 miles	51 min.	76 min	+6 min.
Denham Springs	6	17 miles	28 min.	53 min	14 miles	19 min.	44 min	-10 min.
Geismar	1	24 miles	30 min.	55 min	18 miles	27 min.	52 min	-3 min.
Other	2	> 50 miles	> 55 min.	> 80 min	> 55 miles	> 60 min.	> 85 min	+6 min.

*Information obtained from EverBridge.

**Information obtained from Mapquest.

2. Were any other facilities located within 25 miles of RBS evaluated as possible sites for the proposed back-up EOF? If so, why were they unsuitable as a back-up EOF?

There are currently 4 Entergy office sites that are closer to River Bend Station that were reviewed for potential use as the backup EOF besides the Essen Lane Facility. These are listed below:

- 446 North Blvd office (23.1 miles) (current backup JIC location)
- 5755 Choctaw Drive service center (22.8 miles)
- 2215 Church Street, Zachary service center (10.9 miles)
- Port Allen service center (west bank of Mississippi River) (22.4 miles)

While these sites are closer, our review determined that each of these sites do not have either the necessary conference and auditorium space that is required for the backup EOF nor do they have the supporting infrastructure such as telecom / data / computer that is required for the backup EOF that is found at the Essen Lane facility. Additionally there are concerns with cyber security, physical security and limited parking at each of these other facilities (the North Blvd location is already used by RBS as our backup Joint Information Center).

The selection of the Essen Lane facility was based upon the office space available to address the requirements for the Alt EOF, along with the infrastructure capabilities at that location (cyber security / telecom / computer data access / backup power / parking including overflow parking if necessary.) There is also additional auditorium and conference room space currently reserved for use by the Alt EOF at the Essen Lane facility in the event more space would be required.