



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
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Anthony J. Vitale
Site Vice President

PNP 2012-050

June 8, 2012

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

SUBJECT: 90-Day Response to the March 12, 2012, Information Request, Action Plan for Completing Emergency Communication and Staffing Assessments

Palisades Nuclear Plant
Docket 50-255
License No. DPR-20

- References:
1. NRC letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012 (ADAMS Accession Number ML12053A340)
 2. Entergy Nuclear Operations, Inc. letter to NRC, "Entergy Nuclear Operations, Inc. 60-Day Response to the March 12, 2012, Information Request, Action Plan for Completing Emergency Communication and Staffing Assessments, dated May 11, 2012

Dear Sir or Madam:

On March 12, 2012, the NRC issued Reference 1. Enclosure 5 of Reference 1 contains specific requested actions and requested information associated with Recommendation 9.3 for Emergency Preparedness programs. In accordance with 10 CFR 50.54, "Conditions of licenses," paragraph (f), addressees were requested to submit a written response to the information requests. The letter also provided requested due dates for written responses.

In accordance with the Reference 2 (60-day response) on May 11, 2012, Entergy Nuclear Operations, Inc. submitted an alternative course of action for providing the requested information. The alternative course of action included revised information due dates and the basis for those dates. As described in the alternative course of action, Attachment 1 to this letter transmits the responses to the following information

requests: Enclosure 5 communications request #2 and staffing requests #3, #4, and #5.

The new commitments contained in this submittal are summarized in Attachment 2.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 8, 2012.

Sincerely,



ajv/jse

- Attachments:
1. Request for Information 90-Day Emergency Preparedness Response
 2. List of Regulatory Commitments

cc: Director of Office of Nuclear Regulation
Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC

Attachment 1 to

PNP 2012-050

Request for Information 90-Day Emergency Preparedness Response

Request for Information (RFI) 90-Day Emergency Preparedness Response

Communications:

Nuclear Regulatory Commission (NRC) Request

2. Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

Entergy Nuclear Operations, Inc. (ENO) Response

2. Purchase orders have been submitted for two uninterruptible power supplies (UPSs) to be used at Palisades Nuclear Plant (PNP) to provide backup power upon loss of all alternating current power for radio communications systems for onsite response teams and offsite field monitoring teams. The schedule for installation of the UPSs will be provided with the communications assessment by October 31, 2012, as previously committed to in the 60-day response (Reference 2).

In addition to existing emergency response radios and B.5.b dedicated radios currently on site at PNP, ten additional portable digital radios, with extra batteries and chargers, to be used for communications with onsite response teams or offsite field monitoring teams, have been purchased, received, and deployed.

In addition to existing satellite phones currently on site at PNP, 11 additional battery-operated satellite phones, to be used for emergency onsite and offsite communications, have been purchased and received for deployment.

Staffing:

NRC Request

3. Identify how the augmented staff would be notified given degraded communications capabilities.

ENO Response

3. Initial expectations have been communicated to the Emergency Response Organization (ERO) to respond to their assigned emergency response facilities when made aware of an area-wide loss-of-grid that results in degraded communications capability. This will be included in the ERO annual requalification training program by December 12, 2012.
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NRC Request

4. Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.

ENO Response

4. Various types of transport to PNP are applicable including: walking, personal vehicle, helicopter, and watercraft.

Pursuant to Michigan Public Act 390 of 1976, known as the Michigan Emergency Management Act, the Michigan State Police Emergency Management Homeland Security Division (MSP/EMHSD) is required by state law to provide support, consistent with competing priorities, to PNP in the event of a large-scale natural disaster that inhibits site access. MSP/EMHSD is the central coordinating agency for mutual aid in Michigan for all state, local and federal resources. This support may include enabling plant emergency responders to gain access to the nuclear plant site by clearing roads, or coordinating air or water transportation, as needed.

The following Letters of Agreement for assistance and/or other services are also in place in accordance with the PNP Site Emergency Plan:

Covert Fire Department
South Haven Area Emergency Services Authority
Mutual Assistance Agreement

In support of these agreements, Entergy Nuclear Operations, Inc. (ENO) is evaluating additional potential staging areas to be used by the emergency responders, if they are available, as common locations for transport to the PNP site. This evaluation is scheduled for completion by October 30, 2012.

NRC Request

5. Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.
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ENO Response

5. ENO is assessing initial on-shift ERO staffing at PNP for design-basis event conditions in response to the requirements of changes to 10 CFR Part 50, Appendix E, Section IV(A)(9). This assessment is scheduled for completion by December 24, 2012. Although limited to the time following a design-basis event initiation until the on-shift ERO is augmented, this assessment is expected to provide an initial indication of the adequacy of staffing to respond to beyond design-basis events.

In addition, supplies including food and water to support extended presence of emergency workers at PNP have been purchased and are available on site.

References:

1. NRC letter to ENO, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012 (ML12053A340)
 2. ENO letter to NRC, "Entergy Nuclear Operations, Inc. 60-Day Response to the March 12, 2012, Information Request, Action Plan for Completing Emergency Communication and Staffing Assessments," dated May 11, 2012
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Attachment 2 to
PNP 2012-050
List of Regulatory Commitments

One Page Follows

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy Nuclear Operations, Inc. (ENO) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Include instructions for the Emergency Response Organization (ERO) to respond to their assigned emergency response facilities when made aware of an area-wide loss-of-grid in the ERO annual requalification training program.	X		December 12, 2012
ENO will evaluate additional potential staging areas to be used by the emergency responders, if they are available, as common locations for transport to the affected site.	X		October 30, 2012