



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 24, 2013

Vice President, Operations
Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3
17265 River Road
Killona, LA 70057-3093

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 – SAFETY ASSESSMENT
IN RESPONSE TO REQUEST FOR INFORMATION PURSUANT TO 10 CFR
50.54(f) - RECOMMENDATION 9.3 COMMUNICATIONS ASSESSMENT (TAC
NO. MF0043)

Dear Sir or Madam:

By letter dated March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued a request for information pursuant to Section 50.54(f) to Title 10 of the *Code of Federal Regulations* (henceforth referred to as the 50.54(f) letter). The request was issued as a part of implementing lessons learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 5 to the 50.54(f) letter contained specific requested information associated with the NRC's Near-Term Task Force Recommendation 9.3 for emergency preparedness communications. Specifically, the letter requested that licensees provide an assessment of the current communications systems and equipment used during an emergency event.

By letter dated October 31, 2012, Entergy Operations, Inc. (the licensee), responded to this request for Waterford Steam Electric Station, Unit 3. In response to NRC staff questions, the licensee provided additional information by letter dated February 21, 2013.

The NRC staff has reviewed the communications assessment for Waterford Steam Electric Station, Unit 3, and, as documented in the enclosed safety assessment, determined that the assessment for communications is reasonable, and the interim measures, analyzed existing systems, and proposed enhancements will help to ensure that communications are maintained. Further, in coordination with the Near-Term Task Force Recommendation 4.2 (mitigating strategies), the NRC staff plans to follow up with the licensee to confirm that upgrades to the site's communications systems have been completed.

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If you have any questions, please contact me at 301-415-1480 or via e-mail at kaly.kalyanam@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Kalyanam". The signature is fluid and cursive, with a horizontal line underlining the name.

N. Kalyanam, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure:
As stated

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY ASSESSMENT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REVIEW OF COMMUNICATIONS IN RESPONSE TO

REQUEST FOR INFORMATION DATED MARCH 12, 2012

ENTERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

1.0 INTRODUCTION

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340), the U.S. Nuclear Regulatory Commission (NRC) issued a request for information pursuant to Section 50.54(f) to Title 10 of the *Code of Federal Regulations* (10 CFR) (henceforth referred to as the 50.54(f) letter). The request was issued as a part of implementing lessons learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 5 to the 50.54(f) letter contained specific requested information associated with the NRC's Near-Term Task Force Recommendation 9.3 for emergency preparedness communications. Specifically, the letter requested that licensees provide an assessment of the current communications systems and equipment used during an emergency event.

By letter dated October 31, 2012 (ADAMS Accession No. ML12306A194), as supplemented by letter dated February 21, 2013 (ADAMS Accession No. ML13053A204), Entergy Operations, Inc. (Entergy), the licensee for Waterford Steam Electric Station, Unit 3 (Waterford 3), provided an assessment of its communications capabilities in response to the NRC's request for information.

Within the licensee response letter, an assessment of the current communications systems and equipment to be used during an emergency event was performed to identify any enhancements needed to ensure communications are maintained during and following a beyond design basis large-scale natural event. In this assessment, it was assumed that a large-scale natural event causes: (1) a loss of all alternating current (ac) power, and (2) extensive damage to normal and emergency communications systems both onsite and in the area surrounding the site (i.e., within 25 miles of the site, consistent with the guidance endorsed by the NRC's letter dated May 15, 2012¹). Additionally, interim actions were identified by the licensee during the period of implementation of the planned improvements to the communications systems or procedures.

¹ Skeen, D. L., U.S. Nuclear Regulatory Commission, letter to Susan Perkins-Grew, Nuclear Energy Institute, "U.S. Nuclear Regulatory Commission Review of NEI 12-01, 'Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities,' Revision 0," dated May 2012," dated May 15, 2012 (ADAMS Accession No. ML12131A043).

1.1 Background

On March 12, 2012, the NRC issued a letter entitled "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." In accordance with 10 CFR 50.54(f), addressees were requested to submit a written response to the information requests within 90 days.

The 50.54(f) letter stated that if an addressee cannot meet the requested response date, then the addressee must respond within 60 days of the date of the letter, and describe the alternative course of action that it proposes to take, including any estimated completion date. By letter dated May 10, 2012 (ADAMS Accession No. ML12135A087), the licensee committed to submitting its completed communications assessment and implementation schedule by October 31, 2012. By letter dated June 7, 2012 (ADAMS Accession No. ML12164A683), the licensee also provided a description of any interim actions (discussed in further detail in Section 3.0) 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. The NRC staff found the proposed schedule acceptable by letter dated July 26, 2012 (ADAMS Accession No. ML12200A106).

Enclosure 5 of the 50.54(f) letter contained specific requested information associated with NRC's Near-Term Task Force Recommendation 9.3 for emergency preparedness communications. Specifically, the letter requested that licensees provide an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a large-scale natural event and subsequent loss of ac power. The licensee's assessment should:

- identify any planned or potential improvements to existing onsite communications systems and their required normal and/or backup power supplies;
- identify any planned or potential improvements to existing offsite communications systems and their required normal and/or backup power supplies;
- provide a description of any new communications system(s) or technologies that will be deployed based upon a large-scale natural event and extensive damage to normal and emergency communications systems both onsite and offsite; and
- provide a description of how the new and/or improved systems and power supplies will be able to provide for communications during a loss of all ac power.

The 50.54(f) letter also requested the licensees to:

- 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; and

- provide an implementation schedule of the time needed to conduct and implement the results of the communications assessment.

2.0 REGULATORY EVALUATION

The NRC staff reviewed the licensee's responses to the 50.54(f) letter against the regulations and guidance described below.

2.1 Regulations

Section 50.47, "Emergency plans," of 10 CFR Part 50, sets forth emergency plan requirements for nuclear power plant facilities.

Section 50.47(b) establishes the standards that the onsite and offsite emergency response plans must meet for NRC staff to make a positive finding that there is reasonable assurance that the licensee can and will take adequate protective measures in the event of a radiological emergency. Planning Standard (6) of this section requires that a licensee's emergency response plan contain provisions for communications among principal response organizations to emergency personnel and to the public. Planning Standard (8) requires that adequate emergency facilities and equipment to support emergency response are provided and maintained.

Section IV.D, "Notification Procedures," of Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to 10 CFR Part 50, requires that a licensee have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency. The design objective of the prompt public alert and notification system shall be to have the capability to complete the initial alerting and initiate notification of the public within the plume exposure pathway within about 15 minutes. This alerting and notification capability will include a backup method of public alerting and notification.

Section IV.E, "Emergency Facilities and Equipment," of Appendix E to 10 CFR Part 50, states that adequate provisions shall be made and described for emergency facilities including at least one onsite and one offsite communications system; and each system shall have a backup power source. These arrangements will include:

- a. Provision for communications with contiguous State/local governments within the plume exposure pathway emergency planning zone.
- b. Provision for communications with Federal emergency response organizations.
- c. Provision for communications among the nuclear power reactor control room, the onsite technical support center, and the emergency operations facility; and among the nuclear facility, the principal State and local emergency operations centers, and the field assessment teams.
- d. Provisions for communications by the licensee with NRC Headquarters and the appropriate NRC Regional Office Operations Center from the nuclear power

reactor control room, the onsite technical support center, and the emergency operations facility.

2.2 Guidance

Nuclear Energy Institute (NEI) 12-01, Revision 0, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," dated May 2012, presents a methodology for licensees to analyze their ability to perform critical communications during and after a large-scale natural event. NRC staff has previously reviewed NEI 12-01 (ADAMS Accession No. ML12131A043), and determined that it was an acceptable method for licensees to use in responding to the 50.54(f) letter.

The NRC staff reviewed the licensee's analyses against the assumptions and guidance within NEI 12-01, Sections 2.2, 2.4, and 4. These sections provide a discussion on the assumptions and criteria to be used for a communications assessment.

2.0 TECHNICAL EVALUATION

In its October 31, 2012 letter, as supplemented by letter dated February 21, 2013, the licensee submitted its assessment of communications assuming a large-scale natural event, which would lead to an extended loss of all ac power. This letter included a discussion of required communications links, primary and backup methods of communications, and any identified improvements.

3.1 Communication Areas Reviewed

3.1.1 Communication Links

Waterford 3 currently has communications capabilities with offsite response organizations (OROs), the NRC, between licensee emergency response facilities (ERFs), with field and offsite monitoring teams, and with in-plant and offsite licensee emergency response organization staff. As part of its communications assessment, the licensee has determined that many of the communications equipment described in its emergency plan can be assumed to not be available. However, certain existing onsite communications system equipment such as the existing site radios,² would be available after implementation of planned enhancements, for the communication links listed above given a seismic, high wind, or flooding event.

As an interim measure prior to the implementation of all planned enhancements, the licensee has staged satellite phones at the ERFs. Additionally, the licensee has purchased additional radios and spare batteries for the site. This purchased equipment will be used in conjunction with existing site radios (capable of communications without repeaters) until the final implementation of all planned enhancements. Backup power is provided for the primary radio repeater. User aids for the satellite phones are located with the satellite phones; further, the licensee's staff will be familiarized with communications equipment use and associated limitations prior to the full implementation of all enhancements.

² Sound-powered telephones are expected to be available at the control room.

As the planned enhancement, the licensee plans to ensure that satellite telephones or radio communications are available for communication links outlined in Section 4 of NEI 12-01. Communications between licensee ERFs, and onsite response teams will also utilize radios in addition to portable satellite phones. The licensee has implemented planned improvements for communications with OROs, by ensuring each organization has satellite phone communications. The licensee will put these enhancements in place, with licensee-approved procedures by November 2015.

The NRC staff has reviewed the licensee's expected communications links within their communications assessment. In reviewing the licensee's submittal, the NRC staff considered whether it is reasonable that each communication link can be maintained, after the implementation of all planned enhancements, in accordance with the NRC-endorsed guidance of NEI 12-01. The satellite telephones, as well as the site radios are expected to help maintain communications offsite and onsite by their ability to function without infrastructure postulated to be damaged by a large-scale natural event.³ The NRC staff concludes that since the licensee's assessment for the availability of communications systems is reasonable, and planned enhancements are to be made for communications areas to help ensure reliability, the licensee's interim measures and proposed enhancements will help to ensure that communications are maintained consistent with the assumptions in NRC-endorsed guidance of NEI 12-01.

3.1.2 Equipment Location

The licensee has determined the survivability of its existing equipment for large-scale natural events by crediting equipment located in seismically analyzed buildings. The capacity of the new equipment in its current configuration was evaluated in its ability to withstand the external hazards as identified in the NEI 12-01 guidance. These hazards include seismic, flooding, and high winds. The licensee's evaluation was based on engineering judgment developed by a consensus of experienced engineers in structural design and construction using the guidance provided in Electric Power Research Institute (EPRI) NP-6041, "A Methodology for Assessment of Nuclear Power Plant Seismic Margin." The 50.54(f) letter states in part, that EPRI NP-6041 provides acceptable guidance for seismic protection walk downs.

The NRC staff reviewed the licensee's submittal and verified that the licensee has considered the equipment location and protection contained within the NRC's endorsed guidance of NEI 12-01. The NRC staff also verified that all equipment discussed in Section 3.1.1 of this document has been analyzed to be available after a large-scale natural event; actions will be taken for its protection; or would be stored in a reasonably protected area from seismic, flooding, and high-wind events as discussed in NEI 12-01. The NRC staff also ensured that ancillary equipment, such as power supplies would be protected from seismic, flooding, and high-wind events.

Based on this review, the NRC staff considers the licensee's analysis of communications assessment equipment survivability and proposed enhancements for equipment location is consistent with NRC-endorsed guidance NEI 12-01. This determination of equipment

³ Site radios are able to function without repeaters; however, the licensee is planning improvements to the protection and power supplies of the radio systems.

protection, support the conclusion that these measures will help to ensure communications equipment availability for a large-scale natural event.

3.1.3 Equipment Power and Fuel

Entergy has analyzed the availability of its communications system power supplies following the loss of all ac power. The licensee has proposed a combination of batteries and uninterruptible power supplies (UPSs) to power site communications equipment, including the satellite phones and radios. The site strategies will result in: (1) each satellite phone will be provided for a 24-hour power supply capability through batteries; (2) radios will be provided for a 24-hour power supply capability through batteries, and (3) UPS units will provide 24 hours of back-up power for radio repeater systems.

The NRC staff has reviewed the licensee's communications assessment for power supplies. In reviewing the submittal, the NRC staff concludes that it is reasonable that power for the existing equipment and proposed enhancement equipment, as listed in Section 3.1.1 of this document, would remain available for 24-hour duration, based on the availability of extra batteries. Additionally, the licensee's interim measures and proposed enhancements are in accordance with NRC-endorsed guidance of NEI 12-01.

Based on this review, the NRC staff considers the licensee's analysis of equipment power and proposed enhancements for equipment power is consistent with NRC-endorsed guidance NEI 12-01. This determination of available equipment power supports the conclusion that these measures will help to ensure communications equipment functionality for a large-scale natural event.

3.1.4 Proceduralization and Training

The licensee has confirmed that there are sufficient reserves of equipment to minimize the need of multi-use equipment for different communication functions. The licensee has plans to revise existing site procedures for inventory checks and testing of the portable satellite phones and the radios in the future. The licensee's staff will be trained on equipment location and use of this communications equipment by November 2015.

General employee training procedures will be updated to include direction regarding actions to be taken by plant employees following the observation of a large-scale natural event should the public address system be unavailable. The licensee has procedures in place for emergency response organization self-activation due to major disturbances in the power grid. These site capabilities will activate the offsite emergency response organization and notify plant staff.

The NRC staff reviewed the licensee's commitments on the planned quality assurance and maintenance of the equipment and licensee staff training on the use of this equipment. The NRC staff determined that the licensee's submittal is in accordance with the NRC-endorsed guidance of NEI 12-01.

Based on this review, the staff considers the licensee's planned proceduralization of equipment use and licensee staff training to be consistent with NRC-endorsed NEI 12-01. This determination of equipment availability and functionality supports the conclusion that these

measures will help to ensure communications equipment functionality for a large-scale natural event.

3.2 Regulatory Commitments

In response to the 50.54(f) letter, by letter dated October 31, 2012, the licensee made the following regulatory commitment, which is applicable to this assessment and will be implemented prior to start-up from Refueling Outage RF 20 in the fall of 2015:

Enhancements identified within the assessment (Attachment 1) will be further developed as implementation progresses. Alternate approaches will be utilized if prudent (e.g., alternate/new technology, improved capability, cost savings, etc.). These enhancement commitments are subject to change as a result of Diverse and Flexible Coping Strategies (FLEX) developments, advances in technology, and progress in the manner of addressing the need for these enhancements.

The NRC staff concludes that reasonable controls for the implementation and for the subsequent evaluation of the proposed changes pertaining to the above regulatory commitment is best provided by the licensee's administrative processes, including its commitment management program. The regulatory commitment above does not warrant the creation of regulatory requirements (items requiring prior NRC approval of subsequent changes).

3.0 CONCLUSION

The NRC staff has reviewed the licensee's communications assessment for communications with or among: OROs, the NRC, the licensee's ERFs, field and offsite monitoring teams, and on-site and in-plant response teams. In reviewing the licensee's submittal, the NRC staff considered the factors outlined above, and determined that its assessment of existing equipment, proposed enhancements, and interim actions was in accordance with the NRC-endorsed guidance of NEI 12-01. The NRC staff concludes that the licensee's assessment for communications is reasonable, and the licensee's interim measures, analyzed existing systems, and proposed enhancements will help to ensure that communications are maintained. Further, in coordination with the Near-Term Task Force Recommendation 4.2 (mitigating strategies), the NRC staff plans to follow up with the licensee to confirm that upgrades to the site's communications systems have been completed.

Principal Contributor: Richard Chang

Date: May 24, 2013

If you have any questions, please contact me at (301) 415-1480 or via e-mail at kaly.kalyanam@nrc.gov.

Sincerely,

/RA/

N. Kaly Kalyanam, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure:
As stated

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