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Lawrence M. Coyle
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JAFP-13-0089
June 27, 2013

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Capability to Perform Offsite Dose Assessment During an Event Involving
Multiple Release Sources

James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
License No. DPR-59

Reference NEI Letter, "Commitment for Implementation of Multi-Unit Dose Assessment
Capability," from J.E. Pollock (NEI) to J.T. Wiggins (NRC), dated March 14,
2013.

Dear Sir or Madam:

By letter dated March 14, 2013, the nuclear industry via the Nuclear Energy Institute (NEI) agreed that each licensee would provide a letter to the NRC staff that addresses the following subjects:

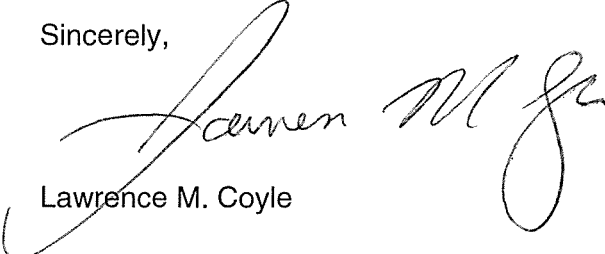
- A summary of the current capability to perform multi-unit/multi-source dose assessment,
- For those who do not have this capability, the anticipated schedule to establish it on an interim and/or permanent basis. It is expected that interim measures will be available to perform this function prior to implementation of a permanent solution,
- Due dates associated with each key schedule action or milestone, and
- A description of how the implementation schedule will be tracked and the associated tracking identifiers (e.g., a commitment tracking or corrective action system number).

In accordance with the referenced letter, Entergy Nuclear Operations, Inc. (ENO) hereby provides the following information regarding the capability to perform offsite dose assessment during an event involving multiple release sources (e.g., assess concurrent releases from a reactor containment and a spent fuel pool) at the James A. FitzPatrick Nuclear Power Plant (JAF) [Attachment 1].

There is one new commitment made in this letter [Attachment 2].

Should you have any questions concerning this report, please direct them to Mr. Pete Cullinan, Emergency Planning, at (315) 349-6859.

Sincerely,

A handwritten signature in cursive script that reads "Lawrence M. Coyle". The signature is written in black ink and is positioned above the printed name.

Lawrence M. Coyle

LC/CA/jo

Attachments: (1) James A. FitzPatrick Offsite Dose Assessment Capability
(2) List of Regulatory Commitments

cc: Mr. Bill Dean, Regional Administrator, Region 1, NRC
Mr. Edward Knutson, Senior Resident Inspector, NRC
Mr. Mohan Thadani, Senior Project Manager, NRC
Ms. Bridget Frymire, NYS PSC
Mr. Francis J. Murray, NYSERDA
Ms. Sue Perkins-Grew, NEI

Attachment 1

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(2 Pages)

James A. FitzPatrick

Offsite Dose Assessment Capability

**James A. FitzPatrick
Offsite Dose Assessment Capability**

1) Summary of current capability to perform multi-source dose assessment:

a) Control Room

JAF currently has the capability for multi-point release rate dose assessment from the Control Room for non-stack releases (i.e. monitored building vents) consistent with EAP-4 Attachment 1, but does not have a method which incorporates a stack release with one or more simultaneous building vent releases.

b) TSC/EOF

JAF currently has the capability for multi-point release rate dose assessment from the TSC/EOF through the use of RADDPOSE dose assessment modeling software consistent with procedure EAP-4.

c) Multi-Unit Dose Assessment including co-located NMP 1&2 units:

JAF does not currently have a method to perform multi-unit release dose assessment in combination with the Constellation Energy NMP 1&2 co-located plants for incidents that affect the combined JAF/NMP site.

2) Anticipated schedule to fully establish multi-unit/multi-source dose assessment on both an interim and/or permanent basis. Provide the due dates associated with key actions or milestones – no due date should exceed December 31, 2014.]

a) Interim Actions

- i) Implement a revision to EAP-4 Attachment 1 that accommodates a simultaneous elevated and ground release pathway for use by control room personnel. Due 12/13/2013. Alternate methods may be incorporated to meet this action – e.g. implement a dose assessment model rapid assessment tool for use by Control Room staff such as the URI/Rascal rapid assessment tool which incorporates multi-source release pathways from JAF.
- ii) Implement a process to integrate NMP dose assessment information with JAF dose assessment information from the affected Control Rooms when multiple units are having abnormal releases during approximately the first hour of classified emergencies – e.g. spreadsheet, common data server, hand form, communications protocols, etc. Due 03/31/2014.
- iii) Implement a process to integrate NMP dose assessment information with JAF dose assessment information from the affected EOF and/or TSCs as appropriate following emergency facilities becoming operational – e.g. - spreadsheet, common data server, hand form, communications protocols, etc. Due 03/31/2014.

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Offsite Dose Assessment Capability

b) Final Actions

- i) Implement a permanent dose assessment tool(s) with multi-source/multi-plant capability at JAF for the Control Room for use during approximately the first hour of the event. The tool(s) will need the capability to integrate NMP 1&2 plant dose assessment results to allow for protective action recommendation development, including a method to select areas to recommend for evacuation – e.g. by ERPA, Sector, or other defining geo-political delineation. 12/31/2014.
- ii) Implement a permanent process to integrate NMP dose assessment information with JAF dose assessment information from the affected EOF and/or TSCs as appropriate following emergency facilities becoming operational – e.g. - spreadsheet, common data server, hand form, communications protocols, etc. Due 03/31/2014.

3) Administrative process that will be used to track completion of the described key actions or milestones in item 2 above:

JAF will track actions identified in item 2 above through a Licensing Action Request within the stations corrective action program – LO-LAR-2013-00174.

Attachment 2

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(1 Page)

List of Regulatory Commitments

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The following table identifies those actions committed to by Entergy 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	
In response to NEI Letter, Commitment for Implementation of Multi-Unit Dose Assessment Capability, from NEI to the NRC, dated March 14, 2013; Entergy will implement a permanent process to integrate NMP dose assessment information with JAF dose assessment information as appropriate.	[✓]		December 31, 2014