



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

August 28, 2013

All Operating Reactor Licensees and
Holders of Construction Permits
(See Enclosure 1 for List of Facilities)

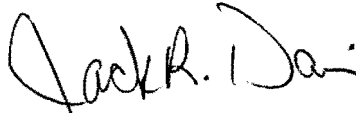
**SUBJECT: NUCLEAR REGULATORY COMMISSION AUDITS OF LICENSEE RESPONSES
TO MITIGATION STRATEGIES ORDER EA-12-049**

The U.S. Nuclear Regulatory Commission (NRC) staff is currently performing a review of licensee responses to Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML12054A736)." Due to the large volume and complexity of the material supporting this review, the NRC staff will be conducting audits of the respective plant submittals. This audit activity will promote the ability of the NRC staff to focus and streamline obtaining the information needed to conduct the EA-12-049 reviews and is intended to complement the ePortal system previously set up by licensees in this area. Audits of licensee's responses will be performed in accordance with NRC Office of Nuclear Reactor Regulation Office Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML082900195). Enclosure 2 provides the associated audit plan for this activity.

As part of the audit process, NRC staff members will be contacting licensees to discuss topics relevant to the existing docketed submittals, as well as information that may be contained in the ePortal system. The NRC staff considers licensee participation in the audit process for the EA-12-049 review to be voluntary. For those licensees who do not wish to participate in the Audit Process, the NRC staff will request the information needed to support the EA-12-049 order review by an alternate mechanism.

If you have any questions about this matter, please contact Jeremy Bowen at (301)415-3471 or Jeremy.Bowen@nrc.gov.

Sincerely,

A handwritten signature in black ink that reads "Jack R. Davis". The signature is written in a cursive style with a large, looping initial "J".

Jack R. Davis, Director
Mitigation Strategies Directorate
Office of Nuclear Reactor Regulation

Enclosures:

1. List of Operating Reactor Licensees and Holders of Construction Permits
2. Audit Plan

cc: Listserv
NEI

ENCLOSURE 1
OPERATING REACTOR LICENSEES AND
HOLDERS OF CONSTRUCTION PERMITS

Arkansas Nuclear One

Entergy Operations, Inc.
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6

Vice President, Operations
Entergy Operations, Inc.
Arkansas Nuclear One
1448 S.R. 333
Russellville, AR 72802

Beaver Valley Power Station

FirstEnergy Nuclear Operating Co.
Docket Nos. 50-334 and 50-412
License Nos. DPR-66 and NPF-73

Mr. Eric A. Larson
Site Vice President
FirstEnergy Nuclear Operating Company
P.O. Box 4, Route 168
Shippingport, PA 15077

Bellefonte Nuclear Power Station

Tennessee Valley Authority
Docket Nos. 50-438 and 50-439
Construction Permit Nos. CPPR No. 122 and
CPPR No. 123

Mr. Michael D. Skaggs
Senior Vice President, Nuclear Construction
Tennessee Valley Authority
Lookout Place 6A
1101 Market Street
Chattanooga, TN 37402-2801

Braidwood Station

Exelon Generation Co., LLC
Docket Nos. STN 50-456 and STN 50-457
License Nos. NPF-72 and NPF-77

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Browns Ferry Nuclear Plant

Tennessee Valley Authority
Docket Nos. 50-259, 50-260 and 50-296
License Nos. DPR-33, DPR-52 and DPR-68

Mr. Joseph W. Shea
Vice President, Nuclear Licensing
Tennessee Valley Authority
1101 Market Street, LP 3D-C
Chattanooga, TN 37402-2801

Brunswick Steam Electric Plant

Carolina Power & Light Co.
Docket Nos. 50-325 and 50-324
License Nos. DPR-71 and DPR-62

Mr. Michael J. Annacone
Vice President
Carolina Power & Light Company
Brunswick Steam Electric Plant
P. O. Box 10429
Southport, NC 28461

Byron Station

Exelon Generation Co., LLC
Docket Nos. STN 50-454 and STN 50-455
License Nos. NPF-37 and NPF-66

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Callaway Plant

Union Electric Company
Docket No. 50-483
License No. NPF-30

Mr. Adam C. Heflin
Senior Vice President and
Chief Nuclear Officer
Union Electric Company
Ameren Missouri
P.O. Box 620
Fulton, MO 65251

Calvert Cliffs Nuclear Power Plant

Calvert Cliffs Nuclear Power Plant, LLC
Docket Nos. 50-317 and 50-318
License Nos. DPR-53 and DPR-69

Mr. George H. Gellrich
Vice President
Calvert Cliffs Nuclear Power Plant, LLC
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

Catawba Nuclear Station

Duke Energy Carolinas, LLC
Docket Nos. 50-413 and 50-414
License Nos. NPF-35 and NPF-52

Mr. Kelvin Henderson
Site Vice President
Duke Energy Carolinas, LLC
Catawba Nuclear Station
4800 Concord Road
York, SC 29745

Clinton Power Station

Exelon Generation Co., LLC
Docket No. 50-461
License No. NPF-62

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Columbia Generating Station

Energy Northwest
Docket No. 50-397
License No. NPF-21

Mr. Mark E. Reddemann
Chief Executive Officer
Energy Northwest
MD 1023
North Power Plant Loop
P.O. Box 968
Richland, WA 99352

Comanche Peak Nuclear Power Plant

Luminant Generation Co., LLC
Docket Nos. 50-445 and 50-446
License Nos. NPF-87 and NPF-89

Mr. Rafael Flores
Senior Vice President and
Chief Nuclear Officer
Luminant Generation Company, LLC
Attn: Regulatory Affairs
P.O. Box 1002
Glen Rose, TX 76043

Cooper Nuclear Station

Nebraska Public Power District
Docket No. 50-298
License No. DPR-46

Mr. Oscar A. Limpas
Vice President Nuclear and
Chief Nuclear Officer
Nebraska Public Power District
Cooper Nuclear Station
72676 648A Avenue
P.O. Box 98
Brownville, NE 68321

Crystal River Nuclear Generating Plant

Florida Power Corp.
Docket No. 50-302
License No. DPR-72

Mr. Terry D. Hobbs
Crystal River Nuclear Plant (NA2C)
15760 West Power Line Street
Crystal River, FL 34428-6708

Davis-Besse Nuclear Power Station
FirstEnergy Nuclear Operating Co.
Docket No. 50-346
License No. NPF-3

Mr. Ray Lieb
Site Vice President
FirstEnergy Nuclear Operating Company
c/o Davis-Besse NPS
5501 N. State Route 2
Oak Harbor, OH 43449-9760

Diablo Canyon Power Plant
Pacific Gas & Electric Co.
Docket Nos. 50-275 and 50-323
License Nos. DPR-80 and DPR-82

Mr. Edward D. Halpin
Senior Vice President and Chief Nuclear
Officer
Pacific Gas and Electric Company
P.O. Box 56
Mail Code 104/6
Avila Beach, CA 93424

Donald C. Cook Nuclear Plant
Indiana Michigan Power Company
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74

Mr. Lawrence J. Weber
Senior Vice President and Chief Nuclear
Officer
Indiana Michigan Power Company
Nuclear Generation Group
One Cook Place
Bridgman, MI 49106

Dresden Nuclear Power Station
Exelon Generation Co., LLC
Docket Nos. 50-237 and 50-249
License Nos. DPR-19 and DPR-25

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC
Docket No. 50-331
License No. DPR-49

Mr. Rich Anderson
Site Vice President
NextEra Energy
Duane Arnold Energy Center
3277 DAEC Road
Palo, IA 52324-9785

Edwin I. Hatch Nuclear Plant
Southern Nuclear Operating Co.
Docket Nos. 50-321 and 50-366
License Nos. DPR-57 and NPF-5

Mr. C.R. Pierce
Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
P.O. Box 1295/BIN B038
Birmingham, AL 35201-1295

Fermi
Detroit Edison Co.
Docket No. 50-341
License No. NPF-43

Mr. Joseph H. Plona
Senior Vice President and Chief Nuclear
Officer
Detroit Edison Company
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6400 North Dixie Highway
Newport, MI 48166

Fort Calhoun Station
Omaha Public Power District
Docket No. 50-285
License No. DPR-40

Mr. Louis Cortopassi
Vice President and Chief Nuclear Officer
Omaha Public Power District
Fort Calhoun Station
Mail Stop FC-2-4
9610 Power Lane
Blair, NE 68008

Grand Gulf Nuclear Station
Entergy Operations, Inc.
Docket No. 50-416
License No. NPF-29

Vice President, Operations
Entergy Operations, Inc.
Grand Gulf Nuclear Station
P.O. Box 756
Port Gibson, MS 39150

H. B. Robinson Steam Electric Plant
Carolina Power & Light Co.
Docket No. 50-261
License No. DPR-23

Mr. William R. Gideon
Vice President
H.B. Robinson Steam Electric Plant
Carolina Power & Light Company
3581 West Entrance Road
Hartsville, SC 29550

Hope Creek Generating Station
PSEG Nuclear, LLC
Docket No. 50-354
License No. NPF-57

Mr. Thomas Joyce
President and Chief Nuclear Officer
PSEG Nuclear LLC - N09
P. O. Box 236
Hancocks Bridge, NJ 08038

Indian Point Energy Center
Entergy Nuclear Operations, Inc.
Docket Nos. 50-247 and 50-286
License Nos. DPR-26 and DPR-64

Vice President, Operations
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
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Buchanan, NY 10511-0249

James A. FitzPatrick Nuclear Power Plant
Entergy Nuclear Operations, Inc.
Docket No. 50-333
License No. DPR-59

Chris Adner, Licensing Manager
Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
P.O. Box 110
Lycoming, NY 13093

Joseph M. Farley Nuclear Plant
Southern Nuclear Operating Co.
Docket Nos. 50-348 and 50-364
License Nos. NPF-2 and NPF-8

Mr. C.R. Pierce
Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
P.O. Box 1295/Bin 038
Birmingham, AL 35201-1295

Kewaunee Power Station
Dominion Energy Kewaunee, Inc.
Docket No. 50-305
License No. DPR-43

Mr. David A. Heacock
President and Chief Nuclear Officer
Dominion Energy Kewaunee, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

LaSalle County Station
Exelon Generation Co., LLC
Docket Nos. 50-373 and 50-374
License Nos. NPF-11 and NPF-18

Mr. Michael J. Pacilio
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Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Limerick Generating Station

Exelon Generation Co., LLC
Docket Nos. 50-352 and 50-353
License Nos. NPF-39 and NPF-85

Mr. Michael J. Pacilio
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Exelon Nuclear
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Warrenville, IL 60555

Millstone Nuclear Power Station

Dominion Nuclear Connecticut, Inc.
Docket Nos. 50-336 and 50-423
License Nos. DPR-65 and NPF-49

Mr. David A. Heacock
President and Chief Nuclear Officer
Virginia Electric & Power Company
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

Monticello Nuclear Generating Plant

Northern States Power Company
Docket No. 50-263
License No. DPR-22

Mr. Mark A. Schimmel
Site Vice President
Northern States Power Company –
Minnesota
Monticello Nuclear Generating Plant
2807 West County Road 75
Monticello, MN 55362-9637

Nine Mile Point Nuclear Station

Nine Mile Point Nuclear Station, LLC
Docket Nos. 50-220 and 50-410
License Nos. DPR-63 and NPF-69

Mr. Christopher Costanzo
Vice President Nine Mile Point
Nine Mile Point Nuclear Station, LLC
P. O. Box 63
Lycoming, NY 13093

North Anna Power Station

Virginia Electric & Power Co.
Docket Nos. 50-338 and 50-339
License Nos. NPF-4 and NPF-7

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Virginia Electric & Power Company
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

Oconee Nuclear Station

Duke Energy Carolinas, LLC
Docket Nos. 50-269, 50-270 and 50-287
License Nos. DPR-38, DPR-47 and DPR-55

Mr. Scott Batson
Vice President, Oconee Nuclear Station
Duke Energy Carolinas, LLC
7800 Rochester Highway
Seneca, SC 29672

Oyster Creek Nuclear Generating Station

Exelon Generation Co., LLC
Docket No. 50-219
License No. DPR-16

Mr. Michael J. Pacilio
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Palisades Nuclear Plant

Entergy Nuclear Operations, Inc.
Docket No. 50-255
License No. DPR-20

Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

Palo Verde Nuclear Generating Station

Arizona Public Service Company
Docket Nos. STN 50-528, STN 50-529 and
STN 50-530
License Nos. NPF-41, NPF-51 and NPF-74

Mr. Randall K. Edington
Executive Vice President Nuclear and Chief
Nuclear Officer
Arizona Public Service Co.
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Phoenix, AZ 85072-2034

Peach Bottom Atomic Power Station

Exelon Generation Co., LLC
Docket Nos. 50-277 and 50-278
License Nos. DPR-44 and DPR-56

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Warrenville, IL 60555

Perry Nuclear Power Plant

FirstEnergy Nuclear Operating Co.
Docket No. 50-440
License No. NPF-58

Mr. Vito A. Kaminskis
Site Vice President - Nuclear - Perry
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
10 Center Road, A290
Perry, OH 44081

Pilgrim Nuclear Power Station Unit No. 1

Entergy Nuclear Operations, Inc.
Docket No. 50-293
License No. DPR-35

Mr. John Dent, Jr.
Vice President and Site Vice President
Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360-5508

Point Beach Nuclear Plant

NextEra Energy Point Beach, LLC
Docket Nos. 50-266 and 50-301
License Nos. DPR-24 and DPR-27

Mr. Larry Meyer
Site Vice President
NextEra Energy Point Beach, LLC
Point Beach Nuclear Plant, Units 1 & 2
6610 Nuclear Road
Two Rivers, WI 54241-9516

Prairie Island Nuclear Generating Plant

Northern States Power Co. Minnesota
Docket Nos. 50-282 and 50-306
License Nos. DPR-42 and DPR-60

Mr. James E. Lynch
Site Vice President
Northern States Power Company –
Minnesota
Prairie Island Nuclear Generating Plant
1717 Wakonade Drive East
Welch, MN 55089-9642

Quad Cities Nuclear Power Station

Exelon Generation Co., LLC
Docket Nos. 50-254 and 50-265
License Nos. DPR-29 and DPR-30

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

R. E. Ginna Nuclear Power Plant

R.E. Ginna Nuclear Power Plant, LLC
Docket No. 50-244
License No. DPR-18

Mr. Joseph E. Pacher
Vice President
R.E. Ginna Nuclear Power Plant, LLC
R.E. Ginna Nuclear Power Plant
1503 Lake Road
Ontario, NY 14519

River Bend Station

Entergy Operations, Inc.
Docket No. 50-458
License No. NPF-47

Vice President, Operations
Entergy Operations, Inc.
River Bend Station
5485 U.S. Highway 61N
St. Francisville, LA 70775

Salem Nuclear Generating Station

PSEG Nuclear, LLC.
Docket Nos. 50-272 & 50-311
License Nos. DPR-70 and DPR-75

Mr. Thomas Joyce
President and Chief Nuclear Officer
PSEG Nuclear LLC - N09
P. O. Box 236
Hancocks Bridge, NJ 08038

San Onofre Nuclear Generating Station

Southern California Edison Company
Docket Nos. 50-361 and 50-362
License Nos. NFP-10 and NFP-15

Mr. Peter T. Dietrich
Senior Vice President and
Chief Nuclear Officer
Southern California Edison Company
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674-0128

Seabrook Nuclear Plant

NextEra Energy Seabrook, LLC
Docket No 50-443
License No. NFP-86

Mr. Kevin Walsh
Vice President, Seabrook Nuclear Plant
c/o Mr. Michael Ossing
NextEra Energy Seabrook, LLC
P.O. Box 300
Seabrook, NH 03874

Sequoyah Nuclear Plant

Tennessee Valley Authority
Docket Nos. 50-327 and 50-328
License Nos. DPR-77 and DPR-79

Mr. Joseph W. Shea
Vice President, Nuclear Licensing
Tennessee Valley Authority
1101 Market Street LP 3D-C
Chattanooga, TN 37402-2801

Shearon Harris Nuclear Power Plant

Carolina Power & Light Co.
Docket No. 50-400
License No. NPF-63

Mr. George T. Hamrick
Vice President
Carolina Power and Light Company
Shearon Harris Nuclear Power Plant
P. O. Box 165, Mail Zone 1
New Hill, NC 27562-0165

South Texas Project

STP Nuclear Operating Co.
Docket Nos. 50-498 and 50-499
License Nos. NPF-76 and NPF-80

Mr. Dennis L. Koehl
President and CEO/CNO
STP Nuclear Operating Company
South Texas Project Electric Generating
Station
P.O. Box 289
Wadsworth, TX 77483

St. Lucie Plant

Florida Power & Light Co.
Docket Nos. 50-335 and 50-389
License Nos. DPR-67 and NPF-16

Mr. Mano Nazar
Executive Vice President and
Chief Nuclear Officer
NextEra Energy
700 Universe Boulevard
P. O. Box 14000
Juno Beach, FL 33408-0420

Surry Power Station

Virginia Electric & Power Co.
Docket Nos. 50-280 and 50-281
License Nos. DPR-32 and DPR-37

Mr. David A. Heacock
President and Chief Nuclear Officer
Dominion Nuclear
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

Susquehanna Steam Electric Station

PPL Susquehanna, LLC
Docket Nos. 50-387 and 50-388
License Nos. NPF-14 and NPF-22

Mr. Timothy S. Rausch
Senior Vice President and Chief Nuclear
Officer
PPL Susquehanna, LLC
769 Salem Boulevard
NUCSB3
Berwick, PA 18603-0467

Three Mile Island, Unit 1

Exelon Nuclear
Docket No. 50-289
License No. DPR-50

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Turkey Point

Florida Power and Light Co.
Docket Nos. 50-250 and 50-251
License Nos. DPR-31 and DPR-41

Mr. Mano Nazar
Executive Vice President and
Chief Nuclear Officer
NextEra Energy
700 Universe Boulevard
P.O. Box 14000
Juno Beach, FL 33408-0420

Vermont Yankee Nuclear Power Station

Entergy Nuclear Operations, Inc.
Docket No. 50-271
License No. DPR-28

Site Vice President
Entergy Nuclear Operations, Inc.
Vermont Yankee Nuclear Power Station
P.O. Box 250, Governor Hunt Road
Vernon, VT 05354

Virgil C. Summer Nuclear Station

South Carolina Electric & Gas Co.
Docket No. 50-395
License No. NPF-12

Mr. Thomas D. Gatlin
Vice President Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
P.O. Box 88, Mail Code 800
Jenkinsville, SC 29065

Vogtle Electric Generating Plant

Southern Nuclear Operating Co.
Docket Nos. 50-424 and 50-425
License Nos. NPF-68 and NPF-81

Mr. C.R. Pierce
Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
P.O. Box 1295/Bin 038
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Waterford Steam Electric Station

Entergy Operations, Inc.
Docket No. 50-382
License No. NPF-38

Vice President, Operations
Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3
17265 River Road
Killona, LA 70057-0751

Watts Bar Nuclear Plant, Unit 1

Tennessee Valley Authority
Docket No. 50-390
License No. NPF-9

Mr. Joseph W. Shea
Vice President, Nuclear Licensing
Tennessee Valley Authority
1101 Market Street, LP 3D-C
Chattanooga, TN 37402-2801

Watts Bar Nuclear Plant, Unit 2

Tennessee Valley Authority
Docket No. 50-391
Construction Permit No. CPPR No. 092

Mr. Michael D. Skaggs
Senior Vice President, Nuclear Construction
Tennessee Valley Authority
Lookout Place 6A
1101 Market Street
Chattanooga, TN 37402-2801

William B. McGuire Nuclear Station

Duke Energy Carolinas, LLC
Docket Nos. 50-369 and 50-370
License Nos. NPF-9 and NPF-17

Mr. Steven D. Capps
Vice President
Duke Energy Carolinas, LLC
McGuire Nuclear Station
12700 Hagers Ferry Road
Huntersville, NC 28078-8985

Wolf Creek Generating Station

Wolf Creek Nuclear Operating Corp.
Docket No. 50-482
License No. NPF-42

Mr. Matthew W. Sunseri
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, KS 66839

Enclosure 2 – Audit Plan

NRC OFFICE OF NUCLEAR REACTOR REGULATION

MITIGATING STRATEGIES DIRECTORATE

AUDIT PLAN TO REVIEW LICENSEE SUBMITTALS IN RESPONSE TO ORDER EA-12-049

"ORDER MODIFYING LICENSES WITH REGARD TO REQUIREMENTS FOR

MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS"

BACKGROUND

In accordance with Order EA-12-049 "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (Agencywide Documents Access Management System (ADAMS) Package Accession No. ML12054A736), holders of operating licenses and construction permits issued under Title 10 of the *Code of Federal Regulations* Part 50, have submitted to the U.S. Nuclear Regulatory Commission (NRC, or Commission), for review, Overall Integrated Plans (OIPs) including descriptions of how compliance with the requirements of Attachment 2 of the order will be achieved. Also in accordance with the order, licensees have begun implementation of the ordered requirements, and are required to complete full implementation no later than two (2) refueling cycles after submittal of the OIPs or by December 31, 2016, whichever comes first.

During the time the licensees are proceeding towards compliance with the order, the NRC staff will audit the OIPs to determine the extent to which the licensees are proceeding on a path towards successful implementation. The NRC staff plans to provide feedback to licensees on their submittals, understanding that periodic licensee updates to these individual plans will be made regularly along each licensee's path to compliance.

AUDIT BASIS

NRC staff will evaluate licensee submittals based on the requirements in Order EA-12-049.

The Nuclear Energy Institute (NEI) developed NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide" in August, 2012 (ADAMS Accession No. ML12242A378) to outline a process, by which, individual licensees would define and implement site-specific diverse and flexible mitigation strategies that reduce the risk associated with beyond-design-basis conditions. This guide was endorsed, with clarifications, by NRC staff guidance JLD-ISG-2012-01 "Compliance with Order EA-12-049, 'Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events'" (ADAMS Accession No. ML12229A174) as providing one acceptable means of meeting the order requirements. Other methods that deviate from the guidance may be found acceptable, but will require additional staff review and attention.

AUDIT SCOPE

The memorandum from Jack Davis dated August 28, 2013, "Supplemental Staff Guidance for Addressing Order EA-12-049 on Mitigation Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML13238A263), provides further guidance on the scope of the NRC staff review of licensee's OIPs.

INFORMATION NECESSARY FOR THE AUDIT

NRC staff and contractors will review the information contained in licensee's submittals in response to Order EA-12-049, as well as the information contained in ePortals established previously in the Order EA-12-049 review effort.

STAFF ASSIGNMENTS

Staff in the Office of Nuclear Reactor Regulation's Mitigating Strategies Directorate will perform this audit.

LOGISTICS

Initial review and development of questions:

The submitted OIPs will be reviewed in batches, using a combination of internal NRC resources and contractor resources. Priority is determined by when a plant needs to be in compliance with Order EA-12-049. During these reviews, staff will develop questions to address any portions of the OIPs that appear to not fully comply with the order or that deviate from the associated guidance documents.

After review and categorization (see below), questions will be provided by e-mail to licensees. Because these questions may not be fully reflective of information that is necessary for the staff to make a determination regarding the OIPs, they should be considered pre-decisional.

Categorization of Questions:

1. Audit questions – information provided by the licensee that appears to be incomplete or non-responsive to acceptable guidance documents, or fails to address an area important to the requirements
2. Clarifications to acceptable guidance documents – information may be complete and responsive, but clarification is required to determine if this is the case
3. Planned Activity – licensee has indicated that information will be provided, or action taken at some point to address a requirement; information about the planned activity's scope or timing may be needed
4. Open Item – areas required by the order or identified in the associated guidance have not been addressed in the submittal; information about the scope and timing for the open item may be needed
5. Generic Concern – questions relating to broader, generic concerns that are to be addressed outside the scope of this audit; additional information may be needed once a generic resolution is identified

Teleconferences with Licensees:

Audit questions (items in category 1) and clarifications (items in category 2) will be discussed in telephone conferences with licensees, supported by management and staff from the Mitigating Strategies Directorate. The purpose of these calls is for the NRC staff and the licensees to have a common understanding of the issue raised by the reviewers. Many of the issues are complex, and the goal is to ensure that the NRC staff understands what the licensee submitted, and, if necessary, for the licensee to understand what supplemental information may be necessary to explain how the requirements of the order are met.

Subsequently, licensees should provide the NRC with the necessary supplemental information that was agreed upon during the teleconference. To facilitate the audit schedule, this information should be provided to the NRC via the ePortal.

Periodic Updates

Due to the iterative and ongoing nature of the development of the licensee OIPs, the NRC staff evaluation of these plans will be based on the information available at the time of review. This will include information contained in the ePortals, information submitted under oath or affirmation as part of the formal periodic status report updates required by the order or as a supplement to the licensee's OIP.

DELIVERABLES

The staff will consider the information reviewed during the audit as part of its overall review of licensees OIPs. The staff's evaluations and audit reports will be issued in batches to support licensees' compliance schedules, as discussed above.

The NRC plans to hold public meetings to discuss the results of the staff's reviews.

REFERENCES

- NRC Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events"
- NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide"
- JLD-ISG-2012-01 "Compliance with Order EA-12-049, 'Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events'"
- Memorandum from Jack Davis dated August 28, 2013, "Supplemental Staff Guidance for Addressing Order EA-12-049 on Mitigation Strategies for Beyond-Design-Basis External Events"
- Individual licensee submittals in response to NRC Order EA-12-049

If you have any questions about this matter, please contact Jeremy Bowen at (301)415-3471 or Jeremy.Bowen@nrc.gov.

Sincerely,

/RA/

Jack R. Davis, Director
Mitigation Strategies Directorate
Office of Nuclear Reactor Regulation

Enclosures:

1. List of Operating Reactor Licensees and Holders of Construction Permits
2. Audit Plan

cc: Listserv
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DATE		08/27/13	08/28/13			

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