



**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)

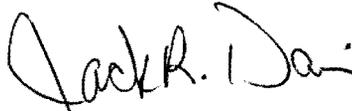
**SUBJECT: NUCLEAR REGULATORY COMMISSION AUDITS OF LICENSEE RESPONSES  
TO MITIGATION STRATEGIES ORDER EA-12-049**

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](mailto: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  
Fermi 2 – 210 NOC  
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  
450 Broadway, GSB  
P.O. Box 249  
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  
President and Chief Nuclear Officer  
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  
President and Chief Nuclear Officer  
Exelon Nuclear  
4300 Winfield Road  
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

Mr. David A. Heacock  
President and Chief Nuclear Officer  
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  
President and Chief Nuclear Officer  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

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.  
P.O. Box 52034, MS 7602  
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

Mr. Michael J. Pacilio  
President and Chief Nuclear Officer  
Exelon Nuclear  
4300 Winfield Road  
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  
Birmingham, AL 35201-1295

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  
NEI

DISTRIBUTION: See next page

**ADAMS Accession No.: ML13234A503** \*via email

OFFICE	NRR/MSD/PM	NRR/JLD/LA		NRR/MSD/BC	NRR/MSD/BC	NRR/MSD/BC
NAME	PBamford	SLent		SWhaley	SBailey	JBowen
DATE	08/26/13	08/26 /13		08/27/13	08/27 /13	08/27/13
OFFICE		NRR/MSD/SA	NRR/MSD/D			
NAME		EBowman*	JDavis			
DATE		08/27/13	08/28/13			

OFFICIAL RECORD COPY