



**Entergy Nuclear Northeast  
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**Lawrence M. Coyle**  
Site Vice President – JAF

JAFP-14-0023  
February 28, 2014

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

**Subject:** Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design Basis External Events (Order Number EA-12-049)

James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
License No. DPR-059

- Reference:**
1. NRC Order Number, EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012
  2. NRC Interim 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, Revision 0, dated August 29, 2012
  3. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012
  4. Entergy to NRC, JAFP-12-0124, Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated October 29, 2012
  5. Entergy to NRC, JAFP-13-0025, Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013
  6. Entergy to NRC, JAFP-13-0112, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design Basis External Events (Order Number EA-12-049), dated August 28, 2013

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission (“NRC” or “Commission”) issued an order [Reference 1] to James A. FitzPatrick Nuclear Power Plant (JAF). Reference 1 was immediately effective and directs JAF to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

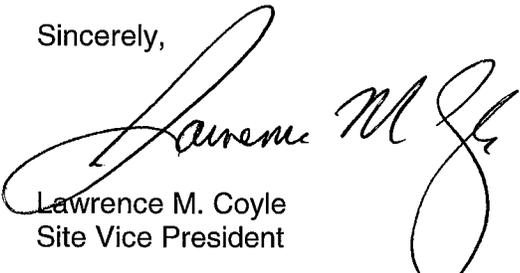
Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance [Reference 2] and an overall integrated plan pursuant to Section IV, Condition C.2. Reference 2 endorses industry guidance document NEI 12-06, Revision 0 [Reference 3] with clarifications and exceptions identified in Reference 2. Reference 4 provided the JAF initial status report regarding mitigation strategies. Reference 5 provided the JAF overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. Reference 6 provided the first six-month status report. The purpose of this letter is to provide the second six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact Chris M. Adner, Regulatory Assurance Manager, at 315-349-6766.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 28<sup>th</sup> day of February, 2014.

Sincerely,



Lawrence M. Coyle  
Site Vice President

LMC/CMA/mh

Attachment: James A. FitzPatrick Nuclear Power Plant’s (JAF) Second Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

cc: Director, Office of Nuclear Reactor Regulation  
NRC Regional Administrator  
NRC Resident Inspector  
Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC  
Mr. Mohan Thadani, Senior Project Manager  
Ms. Bridget Frymire, NYSPSC  
Mr. Francis J. Murray Jr., President NYSERDA

**JAFP-14-0023**

**Attachment**

**James A. FitzPatrick Nuclear Power Plant's (JAF) Second Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events**

**(5 Pages)**

**James A. FitzPatrick Nuclear Power Plant's (JAF) Second Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events**

**1. Introduction**

JAF developed an Overall Integrated Plan (Reference 1 in Section 8), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

**2. Milestone Accomplishments**

The following milestone(s) have been completed since July 31, 2013, and are current as of January 31, 2014.

- First Six-Month Status Report — August 2013 (JAFP-13-0112)

**3. Milestone Schedule Status**

The following provides an update to Attachment 2 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

- Validation/Demonstration

A target completion date was added to the milestone listing for completion of the FLEX Strategy Validation/Demonstration. The validation/demonstration will be completed during the JAF modification implementation outage. This new milestone target date does not impact the Order implementation date.

- Perform Staffing Analysis

The target date for Perform Staffing Analysis has been revised to June 2015. While the activity is in progress it will not be completed until the implementation of modifications (non-outage) has been completed. This revised milestone target date does not impact the Order implementation date.

<b>Milestone</b>	<b>Target Completion Date*</b>	<b>Activity Status</b>	<b>Revised Target Completion Date</b>
60-day Status Update	October 29, 2012	Complete	
Submit Overall Integrated Plan	February 28, 2013	Complete	
Six-Month Status Report	August 2013	Complete	
Refine Strategies	December 2014	Started	
Perform Staffing Analysis	December 2013	In progress	June 2015
Develop Strategies / Contract with RRC	May 2015	Started	
Six-Month Status Report	February 2014	Complete	

**James A. FitzPatrick Nuclear Power Plant's (JAF) Second Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events**

<b>Milestone</b>	<b>Target Completion Date*</b>	<b>Activity Status</b>	<b>Revised Target Completion Date</b>
Develop Mods	June 2015	Not Started	
Draft Implementing Procedures	June 2016	Not Started	
Regional Response Center Operational	July 2015	Started	
Develop Storage Plan	June 2015	Started	
Purchase FLEX Equipment	Fall 2016	Not Started	
Issue Maintenance Procedures (for FLEX equipment)	Fall 2016	Not Started	
Six-Month Status Report	August 2014	Not Started	
Develop Training Plan	October 2014	Not Started	
Refueling Outage 1	Fall 2014	Not Started	
Six-Month Status Report	February 2015	Not Started	
Implement Training	May 2015	Not Started	
Implement Mods (non-outage)	June 2015	Not Started	
Six-Month Status Report	August 2015	Not Started	
Six-Month Status Report	February 2016	Not Started	
Issue Implementing Procedures	May 2016	Not Started	
Six-Month Status Report	August 2016	Not Started	
Implement Mods (outage)	Fall 2016	Not Started	
Implement Training Updates	Fall 2016	Not Started	
Refueling Outage 2 (full implementation)	Fall 2016	Not Started	
Validation / Demonstration	Fall 2016	Not Started	

\*Target Completion Date is the last submitted date from either the overall integrated plan or a previous six-month status report.

**James A. FitzPatrick Nuclear Power Plant's (JAF) Second Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events**

**4. Changes to Compliance Method**

There are no changes to the compliance method as documented in the Overall Integrated Plan [Reference 1 and 3].

**5. Need for Relief/Relaxation and Basis for the Relief/Relaxation**

JAF expects to comply with the order implementation date and no relief/relaxation is required at this time.

**6. Open Items from Overall Integrated Plan and Interim Staff Evaluation**

The following tables provide a summary and status of any open items documented in the Overall Integrated Plan and any open items or confirmatory items documented in the Interim Staff Evaluation (ISE). A fourth table includes the status of each FitzPatrick Audit Question for the Mitigation Strategies (FLEX) Order.

<b>Overall Integrated Plan Open Items</b>	<b>Status</b>
OI-1: Beyond-design-basis external event impact on requirements in existing licensing documents will be determined based on input from the industry groups and direction from the NRC.	Not Started
OI-2: The structure, content and details of the Regional Response Center playbook will be determined.	Started

<b>Interim Staff Evaluation Open Items</b>	<b>Status</b>
The U.S. Nuclear Regulatory Commission (NRC) has not issued an Interim Staff Evaluation for JAF; therefore, there are no open items for the Interim Staff Evaluation identified at this time.	N/A

<b>Interim Staff Evaluation Confirmatory Items</b>	<b>Status</b>
The U.S. Nuclear Regulatory Commission (NRC) has not issued an Interim Staff Evaluation for JAF; therefore, there are no confirmatory items for the Interim Staff Evaluation identified at this time.	N/A

<b>Audit Questions</b>	<b>Status</b>	<b>Completion or Target Date</b>
JAF-001	In progress	August 2015
JAF-002	In progress	August 2015
JAF-003	In progress	August 2015

**James A. FitzPatrick Nuclear Power Plant's (JAF) Second Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events**

<b>Audit Questions</b>	<b>Status</b>	<b>Completion or Target Date</b>
JAF-004	In progress	August 2015
JAF-005	In progress	August 2015
JAF-006	In progress	August 2015
JAF-008	In progress	August 2015
JAF-009	In progress	August 2015
JAF-010	In progress	August 2015
JAF-011	In progress	August 2015
JAF-012	In progress	August 2015
JAF-013	In progress	August 2015
JAF-014	In progress	August 2015
JAF-015	Closed	
JAF-016	Closed	
JAF-017	In progress	August 2015
JAF-018	Closed	
JAF-019	In progress	August 2015
JAF-021	Closed	
JAF-022	In progress	August 2015
JAF-023	In progress	August 2015
JAF-026	Closed	
JAF-027	In progress	August 2015
JAF-028	In progress	August 2015
JAF-029	Closed	
JAF-031	In progress	August 2015
JAF-032	Closed	
JAF-033	In progress	August 2015
JAF-034	Closed	
JAF-035	In progress	August 2015
JAF-036	Closed	
JAF-037	Closed	
JAF-038	Closed	
JAF-040	In progress	August 2015
JAF-043	Closed	
JAF-046	Closed	
JAF-049	Closed	
JAF-050	In progress	August 2015
JAF-052	Closed	
JAF-053	Closed	
JAF-055	Closed	
JAF-056	In progress	August 2015
JAF-057	Closed	

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<b>Audit Questions</b>	<b>Status</b>	<b>Completion or Target Date</b>
JAF-058	Closed	
JAF-059	Closed	
JAF-060	In progress	August 2015
JAF-061	In progress	August 2015
JAF-062	In progress	August 2015
JAF-063	Closed	
JAF-064	In progress	August 2015
JAF-065	In progress	August 2015
JAF-066	In progress	August 2015
JAF-068	Closed	
JAF-069	In progress	August 2015
JAF-071	Closed	
JAF-072	Closed	
JAF-073	Closed	

**7. Potential Interim Staff Evaluation Impacts**

The NRC has not yet issued an interim staff evaluation for JAF; therefore, there are no potential impacts to the Interim Staff Evaluation identified at this time.

**8. References**

1. Entergy to NRC, JAFP-13-0025, Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013.
2. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012.
3. Entergy to NRC, JAFP-13-0112, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design Basis External Events (Order Number EA-12-049), dated August 28, 2013.