



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

March 26, 2014

All Operating Reactor Licensees and
Holders of Construction Permits on the
Enclosed List

**SUBJECT: NUCLEAR REGULATORY COMMISSION AUDITS OF LICENSEE RESPONSES
TO RELIABLE SPENT FUEL POOL INSTRUMENTATION ORDER EA-12-051**

The U.S. Nuclear Regulatory Commission (NRC) staff is currently performing a review of licensee responses to Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A679). To synchronize this review with other NRC staff activities following the events at Fukushima Dai-ichi, the NRC staff will complete the ongoing review by 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 Order EA-12-051 reviews by utilizing the ePortal system previously set up by licensees in this area. If necessary, onsite audits will be conducted in conjunction with the Mitigation Strategies onsite audits related to order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML12054A736). 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 to this document 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 Order EA-12-051 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 Order EA-12-051 review by an alternate mechanism.

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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, appearing to read "Jack R. Davis". The signature is fluid and cursive, with the first name "Jack" being the most prominent.

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: Distribution via listserv
NEI

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. George T. Hamrick
Vice President
Duke Energy Progress, Inc
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. Fadi Diya
Senior Vice President and
Chief Nuclear Officer
Union Electric Company
Ameren Missouri
Callaway Plant
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. Raymond A. Lieb
Site Vice President-Nuclear Davis Besse
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

Duke Energy Progress, Inc.
Docket No. 50-261
License No. DPR-23

Mr. William R. Gideon, Vice President
H.B. Robinson Steam Electric Plant
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 Nuclear Generating

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
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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
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Dominion Nuclear Connecticut, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

Monticello Nuclear Generating Plant

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

Mrs. Karen D. Fili
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
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Exelon Nuclear
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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

Mr. Michael J. Pacilio
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Perry Nuclear Power Plant

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

Mr. Ernest J. Harkness
Site Vice President - Nuclear - Perry
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
P.O. Box 97, 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. Eric McCartney
Site Vice President
NextEra Energy Point Beach, LLC

6610 Nuclear Road
Two Rivers, WI 54241-9516

Prairie Island Nuclear Generating Plant

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

Mr. Kevin
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. Thomas J. Palmisano
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
Duke Energy Progress, Inc
Docket No. 50-400
License No. NPF-63

Mr. Ernest J. Kapopoulos Jr.
Vice President
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
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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. Adam C. Heflin
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-12-051

"ISSUANCE OF ORDER TO MODIFY LICENSES WITH REGARD TO

RELIABLE SPENT FUEL POOL INSTRUMENTATION"

BACKGROUND

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A679), to all power reactor licensees and holders of construction permits in active or deferred status. This order requires, in part, that all operating reactor sites have a reliable means of remotely monitoring wide-range Spent Fuel Pool (SFP) levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event (BDBEE). The order required all holders of operating licenses issued under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," to submit to the NRC an Overall Integrated Plan (OIP) by February 28, 2013.

While licensees were proceeding towards compliance with the order, the NRC staff reviewed the OIPs, as supplemented, to determine the extent to which the licensees were proceeding on a path towards successful implementation. As a result, the NRC staff issued interim staff evaluations (ISEs) to each licensee, which provided preliminary NRC staff evaluations that the licensee has provided a reasonable path for compliance with the order and identified areas where additional information is needed. The ISEs identified a specific date for each licensee to provide its responses to the request for additional information (RAI), which corresponded to six months prior to the site's compliance date.

To synchronize this review with other NRC staff activities following the events at Fukushima Dai-ichi, the NRC staff will conduct audits of licensee OIP submittals, as supplemented, per NRC Office of Nuclear Reactor Regulation Office Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML082900195). This audit activity will promote the ability of the NRC staff to focus and streamline obtaining the information needed to conduct the Order EA-12-051 reviews by utilizing the ePortal system previously set up by licensees in this area. If necessary, onsite audits will be conducted in conjunction with the Mitigation Strategies onsite audits related to Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML12054A736). In conducting these audits, the NRC staff gains a better understanding of submitted information, identifies additional information necessary for the licensee to supplement its plan, and identifies

Enclosure 2

any staff potential concerns. The ongoing audit process allows the staff to assess whether it has enough information to make an Integrated Plan safety evaluation.

In addition to announcing the transition to this audit based review process, this audit plan also notifies each licensee participating in the audit not to formally submit their RAI responses on the docket but instead, put their responses and any other supporting information on their ePortals by the date identified in their ISE to support the staff's review process.

AUDIT BASIS

NRC staff will review the information contained in licensee's submittals in response to Commission Order dated March 12, 2012, modifying licenses with regard to requirements for Reliable Spent Fuel Pool (SFP) Instrumentation (Order Number EA-12-051).

By letter dated August 24, 2012, the Nuclear Energy Institute (NEI) developed NEI 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (ADAMS Accession No. ML12240A307) to outline a process, by which, individual licensees would define and implement reliable and available SFP level indication. This guide was endorsed, with exceptions and clarifications, by NRC interim staff guidance (ISG) JLD-ISG-2012-03 "Compliance with Order EA-12-051, 'Reliable Spent Fuel Pool Instrumentation'" (ADAMS Accession No. ML12221A339) 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 audit's purpose and scope is to review the OIP audit questions, responses, and supporting information via the ePortal and/or onsite audit visits that address requested information identified in the ISEs and the ongoing audit process. The purpose of the audits is to obtain and review information responsive to NRC staff questions, and to observe and gain a better understanding of the basis for the site's overall program to ensure the licensee is on the correct path for compliance with the Spent Fuel Instrumentation order.

INFORMATION NECESSARY FOR THE AUDIT AND PROCESS

NRC staff will review the information contained in licensees' OIPs in response to order EA-12-051, as supplemented, and the information provided via this audit review process using the respective licensee ePortals in-office and/or from onsite audit visits.

STAFF ASSIGNMENTS

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

LOGISTICS

Continuing Review and Development of Further Questions:

The submitted OIPs will be reviewed in batches by NRC staff. Priority is determined by when a plant needs to be in compliance with Order EA-12-051. During these reviews, staff will develop questions to address any portions of the OIPs that appear to not fully comply with the order.

After review, 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.

Teleconferences with Licensees:

Audit questions 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.

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

REFERENCES

- NRC Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (ADAMS Accession No. ML12054A679)
- NEI 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation'" issued in August, 2012 (ADAMS Accession No. ML12240A307)
- JLD-ISG-2012-03 "Compliance with Order EA-12-051, 'Reliable Spent Fuel Pool Instrumentation'" (ADAMS Accession No. ML12221A339)
- Individual licensee submittals in response to NRC Order EA-12-051
- Individual NRC interim staff evaluations in response to NRC Order EA-12-051

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

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ADAMS Accession No.: ML14083A620

OFFICE	NRR/MSD/PM	NRR/MSD/LA	NRR/MSD/BC	NRR/MSD/BC	NRR/MSD/BC
NAME	JPaige	SLent	SWhaley	SBailey	JBowen
DATE	3/25/14	3/25/14	3/25/14	3/25/14	3/26/14
OFFICE	NRR/MSD/D				
NAME	JDavis				
DATE	3/26/14				

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Letter to All Operating Reactor Licensees and Holders of Construction Permits from Jack Davis dated March 26, 2014.

SUBJECT: NUCLEAR REGULATORY COMMISSION AUDITS OF LICENSEE RESPONSES TO RELIABLE SPENT FUEL POOL INSTRUMENTATION ORDER EA-12-051

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