



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

April 28, 2014

Vice President, Operations
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, NY 10511-0249

SUBJECT: INDIAN POINT NUCLEAR GENERATING, UNIT NOS. 2 AND 3 -
RESPONSE REGARDING PHASE 1 STAFFING SUBMITTALS
ASSOCIATED WITH NEAR-TERM TASK FORCE RECOMMENDATION
9.3 RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER
PLANT ACCIDENT

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340), the U.S. Nuclear Regulatory Commission (NRC) issued a request for information (RFI) pursuant to Section 50.54, paragraph (f), of Title 10 of the *Code of Federal Regulations* (10 CFR), regarding Recommendations 2.1 (seismic and flooding evaluations), 2.3 (seismic and flooding walk downs), and 9.3 (emergency preparedness communication and staffing) of the Near Term Task Force (NTTF) review of insights from the Fukushima Dai-ichi accident. With respect to Recommendation 9.3, Enclosure 5 to the NRC's letter requested licensees to assess their means to power communications equipment onsite and offsite during a prolonged station blackout (SBO) event and to perform a staffing assessment to determine the staff required to fill all necessary positions in response to a multi-unit event.

The RFI, in part, requested responses pursuant to the provisions of 10 CFR 50.54(f) pertaining to onsite and augmented staff availability to implement the strategies discussed in the emergency plan and/or plant operating procedures including: new staff or functions resulting from the assessment, any identified collateral duties, an implementation schedule to perform the assessments, any identified modifications, and any changes that have been made or will be made to the emergency plan regarding on-shift or augmented staffing. In addition, NTTF Recommendation 9.3 has a dependency on the implementation of NTTF Recommendation 4.2 (mitigating strategies). As a result of this dependency, licensees are responding to the RFI in phases. The Phase 1 staffing assessment had licensees evaluate their ability to respond to a multi-unit SBO event utilizing existing processes and procedures.

By letter dated April 30, 2013 (ADAMS Accession No. ML13246A077), Entergy Nuclear Operations, Inc. provided a submittal to the NRC in response to the RFI for the Phase 1 staffing assessment for Indian Point Nuclear Generating, Unit Nos. 2 and 3 (Indian Point). By letter dated October 1, 2013 (ADAMS Accession No. ML13268A095), the NRC staff issued a request for additional information (RAI) regarding 10 CFR 50.54(f) Recommendation 9.3, Staffing Assessment to Indian Point. This RAI was issued to provide clarification on the method

described in the submittal for alternate air transportation to the site following a beyond-design basis external event. By letters dated October 25, 2013 and March 17, 2014 (ADAMS Accession Nos. ML13304A714 and ML14085A422, respectively), Indian Point provided initial and supplemental responses to the RAI, which included additional information and clarification on the alternate transportation methods described in the initial submittal.

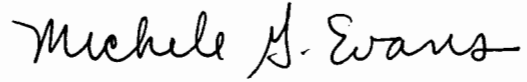
Indian Point assessed their current onsite staffing levels to respond to an event following a beyond-design basis large-scale natural event to identify any needed enhancements to ensure the strategies contained in the existing emergency plan and/or plant operating procedures (SBO procedures) can be performed by the site staff. The assessment assumed that a large scale natural event causes: (1) all units on the site to be affected; (2) an extended loss of all alternating current (ac) power; and (3) access to the site to be impeded for a minimum of 6 hours. Indian Point conducted independent reviews and concluded that based on the site's staffing assessment, the existing on-shift staff is sufficient to implement the existing loss of all ac power and multi-unit event response strategies, while supporting performance of the required emergency planning duties without unacceptable collateral duties.

In accordance with the NRC-endorsed guidance and assumptions of Nuclear Energy Institute (NEI) 12-01 "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Sections 2.2, 2.3, and 3 (ADAMS Accession No. ML12131A043), the NRC staff has reviewed your Phase 1 staffing assessment. The NRC staff reviewed the Phase 1 submittal, initial and supplemental RAI responses, and verified that the onsite minimum staff, as described in the emergency plan, is sufficient to support required plant actions and emergency plan functions, without the assignment of collateral duties that would impact the performance of assigned emergency plan functions. As a result, the NRC staff concludes that Indian Point's Phase 1 staffing submittals adequately address the response strategies needed to respond to an event that results in a SBO using your plant's current procedures.

The NRC staff recognizes that licensees, in coordination with NTF Recommendation 4.2 (mitigating strategies), will submit for NRC staff review a Phase 2 staffing assessment which will provide an assessment of the staffing necessary to perform the functions related to the strategies developed in response to NTF Recommendation 4.2.

Should you have any questions regarding this letter, please contact Brian K. Harris at (301) 415-2277.

Sincerely,

A handwritten signature in black ink that reads "Michele G. Evans". The signature is written in a cursive style with a large initial "M" and a long horizontal stroke at the end.

Michele G. Evans, Director
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

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Should you have any questions regarding this letter, please contact Brian K. Harris at (301) 415-2277.

Sincerely,

/RA/

Michele G. Evans, Director
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-247 and 50-286

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