

PMLevyCOLPEm Resource

From: Habib, Donald
Sent: Tuesday, June 03, 2014 4:37 PM
To: Kitchen, Robert (Robert.Kitchen@duke-energy.com); Waters, David (David.Waters2@duke-energy.com); Wilkins, Tillie (Tillie.Wilkins@duke-energy.com); larry.taylor@duke-energy.com
Cc: Galletta, Thomas
Subject: Fukushima License Conditions

All –

The staff is planning on revising the license condition language from that stated in the Advanced SER Chapter 20 for the Levy COL (see ML12108A197). The license conditions relate to Fukushima Recommendation 4.2 for mitigative strategies and Recommendation 9.3 for emergency preparedness communications and staffing

If you have questions about the language, the staff can discuss it with you at a future, previously scheduled, public meeting or teleconference on either 6/5 or 6/10. Please contact me if you would like to discuss the revised language.

Below is the revised language.

Fukushima Recommendation 4.2 Mitigative Strategies (see Advanced SER Section 20.2)

- At least one (1) year before the latest date set forth in the schedule for completing the inspections, tests, and analyses in the ITAAC submitted in accordance with 10 CFR 52.99(a), DEF shall use the guidance contained in 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:
 - a. DEF shall develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment and spent fuel pool cooling capabilities following a beyond-design-basis external event.
 - b. These strategies must be capable of mitigating a simultaneous loss of all ac power and loss of normal access to the normal heat sink and have adequate capacity to address challenges to core cooling, containment, and spent fuel pool cooling capabilities at all units on the LNP site.
 - c. DEF must provide reasonable protection for the associated equipment from external events. Such protection must demonstrate that there is adequate capacity to address challenges to core cooling, containment, and spent fuel pool cooling capabilities at all units on the LNP site.
 - d. DEF must be capable of implementing the strategies in all modes.
 - e. Full compliance shall include procedures, guidance, training, and acquisition, staging, or installing of equipment needed for the strategies.

DEF shall, at least one (1) year before the latest date set forth in the schedule for completing the inspections, tests, and analyses in the ITAAC submitted in accordance with 10 CFR 52.99(a), develop an overall integrated plan, including a description of how compliance with the requirements described in this license condition will be achieved.

Fukushima Recommendation 9.3 Emergency Preparedness Communications and Staffing (see Advanced SER Section 20.4)

- License Condition (20-3) – DEF will fully implement the following requirements for emergency planning actions related to communications and staffing.

Communications:

At least two (2) years before the latest date set forth in the schedule for completing the inspections, tests, and analyses in the ITAAC submitted in accordance with 10 CFR 52.99(a), DEF shall have performed an assessment of on-site and off-site communications systems and equipment required during an emergency event to ensure communications capabilities can be maintained during prolonged station blackout conditions. The communications capability assessment will be performed in accordance with NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Revision 0.

At least one hundred eighty (180) days before the latest date set forth in the schedule for completing the inspections, tests, and analyses in the ITAAC submitted in accordance with 10 CFR 52.99(a), DEF shall complete implementation of corrective actions identified in the communications capability assessment described above, including any related emergency plan and implementing procedure changes and associated training.

Staffing:

At least two (2) years before the latest date set forth in the schedule for completing the inspections, tests, and analyses in the ITAAC submitted in accordance with 10 CFR 52.99(a), DEF shall have performed assessments of the on-site and augmented staffing capability to satisfy the regulatory requirements for response to a multi-unit event. The staffing assessments will be performed in accordance with NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," Revision 0.

At least one hundred eighty (180) days before the latest date set forth in the schedule for completing the inspections, tests, and analyses in the ITAAC submitted in accordance with 10 CFR 52.99(a), DEF shall revise the LNP Emergency Plan to include the following:

- Incorporation of corrective actions identified in the staffing assessments described above.
- Identification of how the augmented staff will be notified given degraded communications capabilities.

Donald C. Habib
Levy COL Review Lead Project Manager
U.S. Nuclear Regulatory Commission
Office of New Reactors, DNRL/LB4
Room T-6D14
Washington, DC 20555
301-415-1035
Donald.Habib@nrc.gov

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From: Habib, Donald

Created By: Donald.Habib@nrc.gov

Recipients:

"Galletta, Thomas" <Thomas.Galletta@nrc.gov>

Tracking Status: None

"Kitchen, Robert (Robert.Kitchen@duke-energy.com)" <Robert.Kitchen@duke-energy.com>

Tracking Status: None

"Waters, David (David.Waters2@duke-energy.com)" <David.Waters2@duke-energy.com>

Tracking Status: None

"Wilkins, Tillie (Tillie.Wilkins@duke-energy.com)" <Tillie.Wilkins@duke-energy.com>

Tracking Status: None

"larry.taylor@duke-energy.com" <larry.taylor@duke-energy.com>

Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

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