



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

September 29, 2014

The Operating Power Reactors
on the Enclosed List

SUBJECT: RESPONSE REGARDING LICENSEE PHASE 2 STAFFING SUBMITTALS ASSOCIATED WITH NEAR-TERM TASK FORCE RECOMMENDATION 9.3 RELATED TO THE FUKUSHIMA DAI-ICHI NUCLEAR POWER PLANT ACCIDENT (TAC NOS. MF4310, MF4311, MF4312, MF4313, MF4321, MF4322, MF4323, MF4324, MF4325, MF4326, AND MF4327)

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 pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 50.54(f) (hereafter referred to as the 50.54(f) letter), regarding Recommendations 2.1 (seismic and flooding evaluations), 2.3 (seismic and flooding walkdowns), 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 an extended loss of alternating current (ac) power (ELAP) 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 50.54(f) letter in part, required licensee 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 responded to the 50.54(f) letter in phases. The Phase 1 staffing assessment requested licensees to evaluate their ability to respond to a multi-unit ELAP event utilizing existing processes and procedures. The licensee responses to the 50.54(f) letter for the Phase 1 staffing assessments were received and evaluated by the NRC by April 30, 2013. The NRC staff issued acknowledgement letters to all licensees with multi-unit sites, with the exception of San Onofre Nuclear Generating Station, Units 2 and 3, by April 28, 2014.

Licensees were to submit for NRC staff review a Phase 2 staffing assessment which provides an assessment of the staffing necessary to perform the functions related to the strategies developed in response to NTTF Recommendation 4.2 and the resulting Order EA-12-049, "Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML12054A736). Licensees were requested to provide their Phase 2 Staffing Assessments to the NRC no later than four months prior to the beginning of their second refueling outage (as used in the context of NRC Order EA-12-049).

In accordance with the NRC-endorsed guidance, (ADAMS Accession No. ML12131A043) and assumptions of the Nuclear Energy Institute (NEI) 12-01 "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities," (ADAMS Accession No. ML12125A412) Sections 2.2, 2.3, and 3, the NRC staff reviewed your Phase 2 assessment for staffing. The NRC staff noted that you assessed your current onsite minimum staffing levels to identify any enhancements needed to ensure that the strategies contained in the existing emergency plan and/or plant operating procedures, such as an ELAP, can be performed by the site staff. Your assessment assumed that a large-scale natural event causes: (1) all units on the site to be affected, (2) there is an ELAP, and (3) access to the site is impeded for a minimum of six hours. You also assessed your capability to perform the site specific functions related to the strategies developed in response to NTF Recommendation 4.2 and the resulting Order EA-12-049. You conducted independent reviews and concluded, based on your staffing assessment, that the existing on-shift minimum staff is sufficient to implement the existing loss of all ac power, multi-unit event response strategies, including those strategies developed to support the requirements of NRC Order EA-12-049, while supporting performance of the required emergency planning duties without unacceptable collateral duties.

The NRC staff reviewed your Phase 2 staffing submittal and confirmed that your existing emergency response resources, as described in your emergency plan, are sufficient to perform the required plant actions and emergency plan functions, and implement the multi-unit event response strategies that were developed in response to NRC Order EA-12-049 without the assignment of collateral duties that would impact the performance of assigned emergency plan functions.

As a result, the NRC staff concludes that your Phase 2 staffing submittal adequately addresses the response strategies needed to respond to a beyond-design basis external event using your procedures and guidelines. The NRC staff will verify the implementation of your staffing capabilities through the inspection program.

Should you have any questions regarding this letter, please contact Brian K. Harris at (301) 415-2277 or via email at Brian.Harris2@nrc.gov.

Sincerely,

A handwritten signature in black ink that reads "Mandy K. Halter". The signature is written in a cursive style with a large, looping initial "M".

Mandy Halter, Acting Branch Chief
Orders Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Enclosure:
List of Addressees

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List of Addressees

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
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Nuclear Generation Group
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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

Palo Verde Nuclear Generating Station
Arizona Public Service Company
Docket Nos. 50-528, 50-529 and 50-530
License Nos. NPF-41, NPF-51 and NPF-74

Mr. Randall K. Edington
Executive Vice President Nuclear/
Chief Nuclear Officer
Arizona Public Service Company
P.O. Box 52034, MS 7602
Phoenix, AZ 85072-2034

Salem Nuclear Generating Station
PSEG Nuclear, LLC.
Docket Nos. 50-272 and 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

Vogtle Electric Generating Plant
Southern Nuclear Operating Co., Inc.
Docket Nos. 50-424 and 50-425
License Nos. NPF-68 and NPF-81

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Enclosure

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Sincerely,

/RA/

Mandy Halter, Acting Branch Chief
Orders Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Enclosure:
List of Addressees

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ADAMS Accession No.: ML14262A296

***via email**

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