



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

November 13, 2014

Mr. Anthony Vitale
Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR PLANT
BASELINE EMERGENCY PREPAREDNESS BIENNIAL EXERCISE INSPECTION
REPORT 05000255/2014502

Dear Mr. Vitale:

On October 31, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Palisades Nuclear Plant. The enclosed report documents the results of this inspection, which were discussed on October 31, 2014, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures, records, observed activities, and interviewed personnel. No findings were identified during this inspection.

In accordance with Title 10, *Code of Federal Regulations* (CFR), Section 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any), will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Richard A. Skokowski, Chief
Plant Support Branch
Division of Reactor Safety

Docket No. 50-255
License No. DPR-20

Enclosure:
Inspection Report 05000255/2014502
w/Attachment: Supplemental Information

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-255
License No: DPR-20

Report No: 05000255/2014502

Licensee: Entergy Nuclear Operations, Inc.

Facility: Palisades Nuclear Plant

Location: Covert, MI

Dates: October 27 – 31, 2014

Inspectors: R. Jickling, Senior Emergency Preparedness Inspector
J. Lennartz, Acting Senior Resident Inspector
J. Beavers, Emergency Preparedness Inspector
K. Anderson, Physical Security Inspector
R. Baker, Operations Engineer

Approved by: R. Skokowski, Chief
Plant Support Branch
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000255/2014502, 10/27/2014 – 10/31/2014; Palisades Nuclear Plant; Baseline Emergency Preparedness Exercise Evaluation – Hostile Action Event; Exercise Evaluation Scenario Review; and Performance Indicator Verification.

This report covers a one-week period of announced baseline inspection by four regional inspectors, one resident inspector, and one emergency preparedness specialist. The significance of most findings is indicated by their color (i.e., Green, White, Yellow, and Red) using Inspection Manual Chapter 0609, "Significance Determination Process (SDP)." Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 5, dated February 2014.

A. NRC-Identified and Self-Revealed Findings

Cornerstone: Emergency Preparedness

No findings were identified.

B. Licensee-Identified Violations

None

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP7 Exercise Evaluation – Hostile Action Event (71114.07)

.1 Exercise Evaluation

a. Inspection Scope

Title 10, *Code of Federal Regulations* (CFR), Part 50, Appendix E, Section IV.F.2.j, requires, in part, that nuclear power reactor licensees, in each eight calendar year exercise cycle, provide the opportunity for their Emergency Response Organization (ERO) to demonstrate proficiency in the key skills necessary to respond to a Hostile Action (HA) Event directed at the plant site. Palisades Nuclear Plant designed the October 28, 2014, exercise to satisfy this requirement and the NRC inspected the Palisades Nuclear Plant HA Event exercise to assess the licensee's ability to effectively implement their Emergency Plan during a HA Event and adequately protect public health and safety.

The exercise evaluation consisted of the following reviews and assessments:

- The adequacy of the licensee's performance in the biennial exercise conducted on October 28, 2014, regarding the implementation of the Risk-Significant Planning Standards in 10 CFR 50.47 (b)(4), (5), (9), and (10), which address emergency classification, offsite notification, radiological assessment, and Protective Action Recommendations (PARs), respectively.
- The overall adequacy of the licensee's emergency response facilities with regard to NUREG-0696, "Functional Criteria for Emergency Response Facilities," and Emergency Plan commitments. The facilities assessed were the Control Room Simulator, Alternative Emergency Response Facility, Incident Command Post, Central Alarm Station, and the Emergency Operations Facility.
- A review of other performance areas such as the licensee ERO's recognition of abnormal plant conditions; command and control, including interactions with site security staff; intra and inter-facility communications; prioritization of mitigating activities; utilization of repair and field monitoring teams; interface with offsite agencies, including local law enforcement agencies; staffing and procedure adequacy; and the overall implementation of the Emergency Plan and its implementing procedures.
- Past performance issues from NRC inspection reports to determine the effectiveness of corrective actions, as demonstrated during this exercise, to ensure compliance with 10 CFR 50.47(b)(14).
- The adequacy of the licensee's post-exercise critiques, to evaluate Palisades Nuclear Plant's self-assessment of its ERO performance during the October 28, 2014, exercise and to ensure compliance with 10 CFR Part 50, Appendix E, Section IV.F.2.g.

The inspectors reviewed various documents that are listed in the Attachment to this report.

This exercise evaluation inspection constituted one sample as defined in Inspection Procedure (IP) 71114.07-06.

b. Findings

No findings were identified.

1EP8 Exercise Evaluation – Scenario Review (71114.08)

a. Inspection Scope

Prior to the inspection activity, the inspectors conducted an in-office review of the exercise objectives and scenarios submitted to the NRC using IP 71114.08, "Exercise Evaluation – Scenario Review," to determine if the exercise would test major elements of the Emergency Plan as required by 10 CFR 50.47(b)(14). This inspection activity represents one sample on a biennial cycle. The inspectors reviewed various documents that are listed in the Attachment to this report.

This review of the exercise objectives and scenario constituted one sample as defined in IP 71114.08-06.

b. Findings

No findings were identified.

4. OTHER ACTIVITIES

Cornerstone: Emergency Preparedness

4OA1 Performance Indicator Verification (71151)

.1 Drill/Exercise Performance

a. Inspection Scope

The inspectors sampled licensee submittals for the Drill/Exercise Performance (DEP) Performance Indicator (PI) for the period from the third quarter 2013 through the third quarter 2014. Performance Indicator definitions and guidance contained in Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7, were used to determine the accuracy of the PI data reported during those periods. The inspectors reviewed the licensee's records associated with the performance indicator to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI, assessments of PI opportunities during pre-designated control room simulator training sessions, and performance during other drills. The inspectors also reviewed the Corrective Action Program (CAP) to determine if problems had been identified and corrected. Specific documents reviewed are listed in the Attachment to this report.

This inspection constituted one DEP sample as defined in IP 71151-05.

b. Findings

No findings were identified.

.2 Emergency Response Organization Drill Participation

a. Inspection Scope

The inspectors sampled licensee submittals for the ERO Drill Participation PI for the period from the third quarter 2013 through the third quarter 2014. The PI data reported during those periods, PI definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7, were used to determine the accuracy. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI; performance during the 2013 and 2014 drills; and revisions of the roster of personnel assigned to key emergency response organization positions. The inspectors also reviewed the CAP to determine if problems had been identified and corrected. Specific documents reviewed are listed in the Attachment to this report.

This inspection constituted one ERO Drill Participation sample as defined in IP 71151-05.

b. Findings

No findings were identified.

.3 Alert and Notification System

a. Inspection Scope

The inspectors sampled licensee submittals for the Alert and Notification System (ANS) PI for the period from the third quarter 2013 through the third quarter 2014. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7, were used. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI and results of periodic scheduled ANS operability tests. The inspectors also reviewed the CAP to determine if problems had been identified and corrected. Specific documents reviewed are listed in the Attachment to this report.

This inspection constituted one ANS sample as defined in IP 71151-05.

b. Findings

No findings were identified.

4OA6 Management Meetings

.1 Exit Meeting Summary

On October 31, 2014, the inspectors presented the biennial exercise inspection results to Mr. A. Vitale and other members of the licensee staff. The licensee acknowledged the issues presented.

The inspectors confirmed that none of the potential report input discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

A. Vitale, Site Vice President
A. Williams, General Manager, Plant Operations
D. Corbin, Senior Operations Manager
R. Craven, Production Senior Manager
T. Davis, Regulatory Assurance
M. Fields, Senior Emergency Planner
O. Gustafson, Performance Improvement & Regulatory Assurance Director
J. Hardy, Regulatory Assurance Manager
J. Haumersen, Projects Manager
T. Higinbotham, Emergency Planner
D. Lucy, Outage Manager
D. Malone, Emergency Preparedness Manager
T. Mulford, Operations Manager
W. Nelson, Training Manager
A. Notbohm, Performance Improvement Manager
C. Plachta, Quality Assurance Manager
N. Pope, Corporate Emergency Preparedness
J. Ridley, Senior Emergency Planner
D. Rogers, Site Vice President Coordinator
J. Standridge, Corporate Projects
J. Tharp, Security Manager

Nuclear Regulatory Commission

J. Lennartz, Acting Senior Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened, Closed, and Discussed

None

LIST OF DOCUMENTS REVIEWED

The following is a partial list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

1EP7 Exercise Evaluation (71114.07)

- Palisades Nuclear Plant Site Emergency Plan; Revision 25
- EI-1; Emergency Classification and Actions; Revision 56
- EI-3; Communications and Notifications; Revision 31
- EI-4.3; Emergency Operations Facility Activation; revision 27
- EI-6.13; Protective Action Recommendations for Offsite Populations; Revision 23
- EI-11; Determination of Extent of Core Damage; Revision 7
- EI-12.1; Personnel Accountability and Assembly; Revision 18
- EI-14; Medical Care/Treatment of Contaminated, Injured Personnel; Revision 5
- AOP-42; Response to Aircraft Threats; Revision 1
- AOP-43; Response to Non-Aircraft Threats; Revision 1
- AOP-44; Response to Attack on Palisades; Revision 1
- Two Years of Drill and Exercise Scenario Timelines; October 2012 – October 2014
- Two Years of Drill and Exercise Corrective Action Program Issues; October 2012 – October 2014
- CR-PLP-2014-05220; Exercise-Did Not Implement Formal Guidance to Reduce Onsite Protective Actions; October 30, 2014
- CR-PLP-2014-05218; Exercise-Confusion Concerning Lack of 10 CFR 54(x) Communications to Licensee ERFs and Notification of the NRC; October 30, 2014
- CR-PLP-2014-05196; Exercise-Control Room Simulator Failed to Provide Accelerated Notifications to the NRC; October 29, 2014
- CR-PLP-2014-05195; Exercise-Simulated Fire Truck Delayed Due To Lack in Pre-Planning; October 29, 2014
- CR-PLP-2014-05194; Exercise-Alternative ERF Delayed Dispatch of a Response Team Due to Problems with Briefings, Team Selection, and Coordination with ICP/LLEA; October 29, 2014
- CR-PLP-2014-05192; Exercise-JIC Spokesperson Provided Inaccurate Information during the Simulated Media Briefing; October 29, 2014
- CR-PLPL-2014-05191; Exercise-AOP-44 Does Not Provide Recovery Section for Measures after an Event; October 29, 2014

1EP8 Exercise Evaluation – Scenario Review (71114.08)

- Palisades HAB Exercise 60 Day Scenario Submittal; August 26, 2014

4OA1 Performance Indicator Verification (71151)

- NRC Performance Indicator Data; Emergency Preparedness – Drill/Exercise Performance; July 2013 - September 2014
- NRC Performance Indicator Data; Emergency Preparedness – ERO Participation; September 2013 - September 2014
- NRC Performance Indicator Data; Emergency Preparedness – Alert and Notification System Reliability; July 2013 - September 2014

LIST OF ACRONYMS USED

| | |
|-------|---|
| ADAMS | Agencywide Documents Access and Management System |
| ANS | Alert and Notification System |
| CAP | Corrective Action Program |
| CFR | Code of Federal Regulations |
| DEP | Drill/Exercise Performance |
| DRS | Division of Reactor Safety |
| ERO | Emergency Response Organization |
| HA | Hostile Action |
| IP | Inspection Procedure |
| NEI | Nuclear Energy Institute |
| NRC | U.S. Nuclear Regulatory Commission |
| PAR | Protective Action Recommendation |
| PARS | Publicly Available Records System |
| PI | Performance Indicator |
| SDP | Significance Determination Process |

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Richard A. Skokowski, Chief
Plant Support Branch
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w/Attachment: Supplemental Information

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| DATE | 11/10/14 | 11/12/14 | 11/13/14 | |

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Letter to Anthony Vitale from Richard A. Skokowski dated November 13, 2014

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