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Eric W. Olson
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RBG-47546

February 25, 2015

U.S. Nuclear Regulatory Commission
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SUBJECT: Entergy's Fourth Six-Month Status Report in Response to March 12, 2012
Commission Order Modifying Licenses with Regard to Requirements
for Mitigation Strategies for Beyond-Design-Basis External Events
(Order Number EA-12-049)
River Bend Station – Unit 1
Docket No. 50-458
License No. NPF-47

- REFERENCES:
1. NRC Order Number EA-12-049, Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012 (ADAMS Accession No. ML12054A736) (RBC-51013)
 2. NRC Interim Staff Guidance 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, dated August 29, 2012 (ML12229A174)
 3. Nuclear Energy Institute (NEI) 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, August 2012
 4. Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), RBG-47302, dated October 24, 2012
 5. Overall Integrated Plan in Response to March 12, 2012 Commission Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), RBG-47329, dated February 28, 2013
 6. Entergy's Six-Month Status Report In Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), RBG-47389, dated August 28, 2013.
 7. Entergy's Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), RBG-47445, dated February 26, 2014.

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8. Entergy's Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), RBG-47502, dated August 28, 2014.

Dear Sir or Madam:

On March 12, 2012, the NRC issued an order (Reference 1) to Entergy Operations, Inc. (Entergy). Reference 1 was immediately effective and directs River Bend Station (RBS) to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the RBS initial status report regarding mitigation strategies. Reference 5 provided the RBS overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. References 6, 7 and 8 provided the first, second and third six-month status report, respectively. The purpose of this letter is to provide the fourth six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments. Should you have any questions regarding this submittal, please contact Mr. Joseph Clark, Manager – Regulatory Assurance, at 225-381-4177.

I declare under penalty of perjury that the foregoing is true and correct; executed on February 25, 2015.

Sincerely,



EWO/JAC/dhw

Attachment: River Bend Station's Fourth Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

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Attachment to

RBG-47546
(10 pages)

River Bend Station's Fourth Six-Month Status Report for the Implementation of Order
EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation
Strategies for Beyond-Design-Basis External Events

River Bend Station's Fourth Six-Month Status Report for the Implementation of
 Order EA-12-049, Order Modifying Licenses with Regard to Requirements for
 Mitigation Strategies for Beyond-Design-Basis External Events

1. Introduction

Entergy Nuclear Operations, Inc. (Entergy) developed an Overall Integrated Plan for River Bend Station (RBS) in Reference 1, which documented the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the last status report (Reference 5), including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2. Milestone Accomplishments

The following milestone(s) have been completed since August 1, 2014, and are current as of January 31, 2015:

- Third Six-Month Status Report — August 2014.
- Fourth Six-Month Status Report — complete with submission of this document in February 2015

3. Milestone Schedule Status

The following provides an update to Attachment 2 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

Milestone	Target Completion Date*	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct. 2012	Complete	
Submit Overall Integrated Implementation Plan	Feb. 2013	Complete	
Submit Six-Month Status Report	Aug. 2013	Complete	
Develop Mods	Dec. 2013	Complete	
Develop Strategies (Playbook) with National SAFER Response Center	Oct. 2014	Started	Feb. 2015
Purchase/Procure Equipment	Oct. 2014	Started	Feb. 2015
Submit Six-Month Status Report	Feb. 2014	Complete	
Develop FLEX Procedures	May 2014	Complete	
Create Maintenance Procedures	Dec. 2014	Started	March 2015
Submit Six-Month Status Report	Aug. 2014	Complete	

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Procedure Changes Training Material Complete	June 2014	Complete	
Develop Training Plan	June 2014	Complete	
Submit Six-Month Status Report	Feb. 2015	Complete	
Implement Training	Dec. 2014	Started	
Submit Six-Month Status Report	Aug. 2015	Not Started	
Submit Six-Month Status Report	Feb. 2016	Not Started	
Submit Six-Month Status Report	Aug. 2016	Not Started	
Implement Outage Mods	March 2015	Started	
Validation / Demonstration	Dec. 2016	Not Started	
Submit Completion Report	Dec. 2016	Not Started	

*Target Completion Date is the last submitted date from either the overall integrated plan or previous six-month status report.

4. Changes to Compliance Method

During the design phase of the RBS FLEX project, changes were identified to the compliance strategies as described in the Overall Integrated Plan (Reference 1). The changes are summarized below. The changes will be incorporated into a future update.

- The RBS strategy for core cooling has been modified to include an alternate injection path and connection point to the reactor pressure vessel (RPV) for Phase 2. The primary path is from the SPC pump and heat exchanger through the RHR (LPCI) C injection line to the vessel. An alternate path can be established by utilizing a normally closed, cross-tie line between the RHR B pump discharge line and the RHR C pump discharge line. When the cross-tie is opened the SPC pump flow will pass from the RHR C discharge line through the cross-tie to the RHR B discharge line and on to the RPV through the RHR B injection valve. A review and walkdown of cross-tie path concluded that the piping is seismically robust. Incorporation of the cross-tie into the FLEX strategy provides an alternate core cooling path through a different connection point to the vessel.

5. Need for Relief/Relaxation and Basis for the Relief/Relaxation

RBS expects to comply with the order implementation date and no relief/relaxation is required at this time.

6. Open Items from Overall Integrated Plan and Interim Staff Evaluation

The following tables provide a summary and status of any open items documented in the Overall Integrated Plan and any open items or confirmatory items documented in the Interim Staff Evaluation (ISE). A fourth table includes the NRC FLEX Audit Open Items, which includes open items on previously issued Audit Questions and new Safety Evaluation (SE) Open Items that were not closed during the October 2014 NRC Audit. A fifth table includes a listing of all Audit Questions and the status of each item.

Overall Integrated Plan Open Items		Status
1. Beyond-design-basis external event impact on requirements in existing licensing documents will be determined based on input from the industry groups and direction from the NRC.		Entergy has determined that no FSAR changes are required to reflect FLEX. This item was closed during the October 2014 NRC Audit
2. Structure, content and details of the Regional Response Center playbook will be determined.		This item was closed during the October 2014 NRC Audit

Interim Staff Evaluation Open Items		Status
None	N/A	N/A

Interim Staff Evaluation Confirmatory Items		Status
3.1.3.1.A	Confirm that the 2,700 foot separation distance between FLEX storage facilities will be sufficient to ensure that a single tornado would not impact both locations when considering the local tornado data, the actual separation distance and axis.	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-001)
3.2.1.1.A	Confirm that benchmarks are identified and discussed which demonstrate that Modular Accident Analysis Program (MAAP) is an appropriate code for the simulation of an ELAP event at RBS, consistent with the NRC endorsement (ADAMS Accession No. ML13275A318) of the industry position paper on MAAP.	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-009)
3.2.1.1.B	Confirm that the collapsed RPV level remains above Top of Active Fuel and the reactor coolant system cool down rate is within technical specifications limits.	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-012)

Interim Staff Evaluation Confirmatory Items		Status
3.2.1.1.C	Confirm that MAAP is used in accordance with Sections 4.1, 4.2, 4.3, 4.4, and 4.5 of the June 2013 position paper (ADAMS Accession No. ML13190A201).	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-010)
3.2.1.1.D	Confirm that, in using MAAP, the subset of key modeling parameters cited from Tables 4-1 through 4-6 of the "MAAP Application Guidance, Desktop Reference for Using MAAP Software, Revision 2" (Electric Power Research Institute Report 1020236, available at www.epri.com). This should include response at a plant-specific level regarding specific modeling options and parameter choices for key models that would be expected to substantially affect the ELAP analysis performed for RBS.	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-011)
3.2.1.2.A	Confirm that the details of the seal qualification tests, the seal leakage rate models, and supporting test data and any conservative margin support the 66 gallons per minute recirculation pump seal leakage assumed in the ELAP analysis.	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-013)
3.2.1.4.A	Confirm that the seismic evaluation of SPC system components, the spent fuel pool cooling piping, and the battery bus crosstie electrical cabinet used to support FLEX coping strategies, are completed with acceptable results.	This item was closed during the October 2014 NRC Audit (associated with AQs RBS-003 and RBS-056)
3.2.1.4.B	Confirm that the allowable minimum system pressure required to open the SRVs in relation to the RPV pressure, during the depressurization and the RPV fill evolution, is adequately determined.	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-061)
3.2.1.4.C	Confirm that the stresses associated with passing liquid phase water through the SRV tail pipe, including those on the tail pipe, the tail pipe supports, the quencher and the quencher supports are evaluated with acceptable results.	This item was closed during the October 2014 NRC Audit
3.2.1.7.A	Confirm the ability to supply cooling water to the upper containment pool when it is being used for fuel storage during refueling. This capability should be consistent with the NEI paper entitled "Shutdown/Refueling Modes" (ADAMS Accession No. ML13273A514), which has been endorsed by the NRC in a letter dated September 30, 2013 (ADAMS Accession No. ML13267A382), and which the licensee has indicated will be followed.	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-064)

Interim Staff Evaluation Confirmatory Items		Status
3.2.1.8.A	Confirm the acceptability of the alternate approach for use of the installed SPC pumps for RPV makeup. Specifically, confirm the ability of the backup portable pump's capacity to provide both RPV injection and makeup water to the SFP concurrently.	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-061)
3.2.3.A	Confirm that the licensee completes an acceptable MAAP analysis to demonstrate that containment functions are maintained in all phases of an ELAP, with particular regard to the qualification of drywell penetrations and seals at elevated temperatures.	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-013)
3.2.3.B	Confirm that the 209 degrees Fahrenheit suppression pool temperature reached in the ELAP event (which is over the 185 degrees Fahrenheit design limit) does not adversely impact the structural integrity of the containment.	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-054)
3.2.4.4.A	Confirm that any planned changes described in the NRC's communications assessment (ADAMS Accession No. ML13130A068) are completed.	This item was closed during the October 2014 NRC Audit
3.2.4.8.A	Confirm that supporting analyses related to the final size/loading of FLEX generators is completed with acceptable results.	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-049)
3.2.4.10.A	Confirm that the final minimum dc bus voltage is determined as part of the evaluation of an acceptable battery and dc loading profile for the ELAP event.	This item was closed during the October 2014 NRC Audit (associated with AQ RBS-047)
3.4.A	Confirm that the licensee has fully addressed the provisions of NEI 12-06, Sections 5.3.4, 6.2.3.4, 7.3.4, 8.3.4, and 12.2, regarding considerations in using offsite resources.	This item was closed during the October 2014 NRC Audit

October 2014 NRC Audit FLEX Related Open Items (Ref. 7)			
Audit Item Reference	Item Description	Licensee Input Needed	Status
11-C	The need for evaluation of the seismic robustness of non-safety related class 4 piping located in RBS piping tunnels utilized in the FLEX strategy is identified on pages 20 and 21 of the OIP. The completed evaluation has	Provide justification that FLEX 1 pump is not subject to design basis induced internal flooding.	Information uploaded to the ePortal on 12/12/2014

October 2014 NRC Audit FLEX Related Open Items (Ref. 7)			
Audit Item Reference	Item Description	Licensee Input Needed	Status
	confirmed that there are a number of pipe lines in the tunnels, including sections that are not considered seismically robust. The evaluation also identified that these piping sections can be isolated by closing five individual valves if the ELAP is initiated by a seismic event. RBS FLEX procedures will include directions to isolate the valves following a seismic event		
13-C	While the following is not a change in the compliance strategy described in the OIP, it is a clarification with regard to the RBS FLEX strategy and the guidance of NEI 12-06. NEI 12-06 Section 3.2.2, Consideration 13 states that regardless of installed coping capability, all plants will include the ability to use portable pumps to provide RPV/RCS/SG makeup as a means to provide a diverse capability beyond installed equipment. The RBS FLEX strategy does not include this capability, and thus, the crediting of installed SPC pumps for the RBS FLEX Phase 2 strategy is alternative method for satisfying the NEI 12-06 guidance. The use of the installed SPC pumps to provide RPV makeup is an acceptable alternative to a portable FLEX pump for the transitional phase of FLEX. The guidance states that the ELAP response is to be addressed with a combination of three categories of equipment: installed plant capability, portable on-site equipment, and off-site equipment resources. Only one phase of the response is limited to utilizing equipment from just one of the equipment categories. To ensure that there is enough time to deploy		Information uploaded to the ePortal on 12/12/2014

October 2014 NRC Audit FLEX Related Open Items (Ref. 7)			
Audit Item Reference	Item Description	Licensee Input Needed	Status
	and implement portable equipment, Phase 1 can only use installed plant equipment. Even though Phase 2 and Phase 3 will utilize portable equipment (onsite for Phase 2 and offsite from RRC for Phase 3), there is no prohibition against the use of permanently installed equipment in those two phases, as long as it is robust with respect to design basis external events.		
3-E	Discuss strategy for swapping RCIC suction from SP to the UCP and justify that the strategy will be effective under ELAP conditions.		Information uploaded to the ePortal on 1/22/2015
RBS-62-B	In the OIP the licensee states that as heated water is returned to the UHS from the plant and the fans are repowered, evaporation of the basin water will increase. Makeup to the basin will eventually be required and that this will be done via hauling of water from the Mississippi River using trucks provided by the RRC. Provide information on how this will be accomplished.	Justification for not evaluating the primary water haul path for liquefaction	Item closed subsequent to the October 2014 NRC Audit by email dated 1/24/2015 from J. Hughey to D. Williamson (Reference 6)

Audit Questions	Status	Completion or Target Date
RBS-001	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Item 3.1.3.1.A).	
RBS-002	This item was closed during the October 2014 NRC Audit	
RBS-003	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Item 3.2.1.4.A)	
RBS-004	This item was closed during the October 2014 NRC Audit	
RBS-005	This item was closed during the October 2014 NRC Audit	
RBS-006	This item was closed during the October 2014 NRC Audit	

Audit Questions	Status	Completion or Target Date
RBS-008	This item was closed during the October 2014 NRC Audit	
RBS-009	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Item 3.2.1.1.A)	
RBS-010	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Item 3.2.1.1.C)	
RBS-011	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Item 3.2.1.1.D)	
RBS-012	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Item 3.2.1.1.B)	
RBS-013	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Item 3.2.1.2.A and ISE Confirmatory Item 3.2.3.A)	
RBS-015	This item was closed during the October 2014 NRC Audit	
RBS-016	This item was closed during the October 2014 NRC Audit	
RBS-018	This item was closed during the October 2014 NRC Audit	
RBS-019	This item was closed during the October 2014 NRC Audit	
RBS-020	This item was closed during the October 2014 NRC Audit	
RBS-021	This item was closed during the October 2014 NRC Audit	
RBS-022	This item was closed during the October 2014 NRC Audit	
RBS-024	This item was closed during the October 2014 NRC Audit	
RBS-027	This item was closed during the October 2014 NRC Audit	
RBS-028	This item was closed during the October 2014 NRC Audit	
RBS-030	This item was closed during the October 2014 NRC Audit	
RBS-031	This item was closed during the October 2014 NRC Audit	
RBS-032	This item was closed during the October 2014 NRC Audit	
RBS-033	This item was closed during the October 2014 NRC Audit	
RBS-034	This item was closed during the October 2014 NRC Audit	
RBS-035	This item was closed during the October 2014 NRC Audit	
RBS-037	This item was closed during the October 2014 NRC Audit	
RBS-038	This item was closed during the October 2014 NRC Audit	
RBS-045	This item was closed during the October 2014 NRC Audit	
RBS-046	This item was closed during the October 2014 NRC Audit	
RBS-047	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Item 3.2.4.10.A)	

Audit Questions	Status	Completion or Target Date
RBS-049	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Item 3.2.4.8.A)	
RBS-051	This item was closed during the October 2014 NRC Audit	
RBS-052	This item was closed during the October 2014 NRC Audit	
RBS-053	This item was closed during the October 2014 NRC Audit	
RBS-054	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Item 3.2.3.B)	
RBS-055	This item was closed during the October 2014 NRC Audit	
RBS-056	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Item 3.2.1.4.A)	
RBS-057	This item was closed during the October 2014 NRC Audit	
RBS-058	This item was closed during the October 2014 NRC Audit	
RBS-059	This item was closed during the October 2014 NRC Audit	
RBS-060	This item was closed during the October 2014 NRC Audit	
RBS-061	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Items 3.2.1.4.B and 3.2.1.8.A)	
RBS-062	This item was closed subsequent to the NRC Audit by email dated 1/24/2015 (from John Hughey to D.H. Williamson)	
RBS-063	This item was closed during the October 2014 NRC Audit	
RBS-064	This item was closed during the October 2014 NRC Audit (associated with ISE Confirmatory Item 3.2.1.7.A)	

7. Potential Interim Staff Evaluation Impacts

The following item has been identified which has potential impact to the Interim Staff Evaluation (ISE). Items identified in Section 4 of this report and the previous six month status report (Reference 5) also have potential to impact the ISE.

1. The River Bend OIP stated in multiple locations that the RPV pressure would be manually reduced to a range between 100 and 200 psig and maintained in that band during the time that RCIC is providing core cooling and makeup. Entergy has revised the RPV pressure range to between 200 and 400 psig. The preferred method of operating RCIC is to manually control flow by varying the speed of the turbine and pump. The lower pressure band required the turbine/pump speed to be reduced below recommended speeds for the turbine and pump when providing the lower, required makeup late in the scenario. The higher pressure band allows RCIC to provide the lower required makeup while operating at the lowest allowable speed. This revision is not a change in the RBS strategy, but is a change in the parameters for RCIC operation.

8. References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. River Bend Station Overall Integrated Plan In Response To March 12, 2012 Commission Order To Modify Licenses With Regard To Requirements For Mitigation Strategies For Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013.
2. NRC Order Number EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012.
3. Entergy's Six-Month Status Report In Response To March 12, 2012 Commission Order Modifying Licenses With Regard To Requirements For Mitigation Strategies For Beyond-Design-Basis External Events (Order Number EA-12-049), RBG-47389, dated August 28, 2013.
4. NRC Letter, "River Bend Station - Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC No. MF0952)," dated February 25, 2014 (ML13365A281).
5. Entergy's Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), RBG-47502, dated August 28, 2014.
6. NRC Email, "Closure of RBS Audit Item 62-B" from J. Hughey (NRC) to D. Williamson (Entergy), dated January 24, 2015.
7. "River Bend Station Unit 1 - Report for the Audit Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Pool Instrumentation Related to Orders EA-12-049 and EA-12-051," dated Feb. 18, 2015 (ML15026A645)