

ATTACHMENT 2

ORDER EA-12-049 COMPLIANCE ELEMENTS SUMMARY

The elements identified below are included in the PNP Final Integrated Plan (FIP) (Attachment 5), and demonstrate compliance with Order EA-12-049.

Strategies – Complete

PNP strategies are in compliance with Order EA-12-049 and are documented in the FIP. There are no strategy-related items, confirmatory items, audit questions, or audit report items that remain open.

Modifications – Complete

The modifications required to support the FLEX strategies for PNP have been implemented in accordance with the site design control process, and are described in the FIP.

Equipment – Procured and Maintenance & Testing – Complete

The equipment required to implement the FLEX strategies for PNP was procured in accordance with NEI 12-06, “Diverse and Flexible Coping Strategies (FLEX) Implementation Guide” (Reference 12), Sections 11.1, “Quality Attributes,” and 11.2, “Equipment Design,” received at PNP, initially tested/performance verified in accordance with NEI 12-06, Section 11.5, “Maintenance and Testing,” and is available for use.

As discussed in the FIP, maintenance and testing will be conducted through the use of the PNP preventive maintenance program such that equipment reliability is achieved.

Protected Storage – Complete

The storage facilities required to implement the FLEX strategies for PNP have been completed and provide protection from the applicable site hazards, as discussed in the FIP. The equipment required to implement the FLEX strategies for PNP is stored in its protected configurations.

Procedures - Complete

FLEX Support Guidelines (FSGs) and Implementation Guidelines (FIGs) for PNP have been developed, and integrated with existing procedures, such as Emergency Operating Procedure EOP-3.0, “Station Blackout Recovery.” The FSGs, FIGs, and procedures have been validated per NEI 12-06, “Diverse and Flexible Coping Strategies (FLEX) Implementation Guide,” Section 11.4.3, “Development Guidance for FSGs,” and have been issued for use in accordance with the site procedure control program.

Training - Complete

Training has been completed in accordance with an accepted training process as recommended in NEI 12-06, Section 11.6, “Training.”

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Staffing - Complete

The staffing study for PNP has been completed in accordance with 10 CFR 50.54(f), "Request for Information Pursuant to Title 10 of the Code of Federal Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force review of Insights from the Fukushima Dai-ichi Accident," Recommendation 9.3, dated March 12, 2012 (Reference 9). The staffing study was submitted on May 19, 2015 (Reference 10).

National SAFER Response Centers - Complete

ENO has established a contract with Pooled Equipment Inventory Company (PEICo) and has joined the Strategic Alliance for FLEX Emergency Response (SAFER) Team Equipment Committee for off-site facility coordination. PEICo is ready to support PNP with Phase 3 equipment stored in the National SAFER Response Centers in accordance with the site specific SAFER Response Plan.

Validation - Complete

ENO has completed performance of validation activities in accordance with industry developed guidance to assure required tasks, manual actions and decisions for FLEX strategies are feasible and may be executed within the constraints identified in the Overall Integrated Plan and the Final Integrated Plan for Order EA-12-049.

FLEX Program Document – Established

The PNP FLEX program document (EN-OP-201-05, "Palisades FLEX Program Document") has been developed in accordance with the requirements of NEI 12-06.

References:

The following references support the PNP FLEX compliance elements summary:

1. NRC Order Number EA-12-049, *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events*, dated March 12, 2012 (ADAMS Accession No. 12054A736).
2. Entergy Nuclear Operations, Inc. letter to NRC, PNP 2013-010, *Overall Integrated Plan 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)*, dated February 28, 2013 (ADAMS Accession No. ML13246A399).
3. Entergy Nuclear Operation, Inc. letter to NRC, PNP 2013-064, *Palisades Nuclear Plant First 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)*, dated August 28, 2013 (ADAMS Accession No. ML13241A234).

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4. NRC letter, *Palisades Nuclear Plant – Interim Staff Evaluation Regarding Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC No. MF0768)*, dated February 10, 2014 (ADAMS Accession No. ML13365A264).
5. Entergy Nuclear Operation, Inc. letter to NRC, PNP 2014-011, *Palisades Nuclear Plant 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)*, dated February 28, 2014 (ADAMS Accession No. ML14059A078).
6. Entergy Nuclear Operation, Inc. letter to NRC, PNP 2014-085, *Palisades Nuclear Plant 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)*, dated August 28, 2014 (ADAMS Accession No. ML14240A279).
7. Entergy Nuclear Operation, Inc. letter to NRC, PNP 2015-007, *Palisades Nuclear Plant 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)*, dated February 27, 2015 (ADAMS Accession No. ML15062A011).
8. Entergy Nuclear Operation, Inc. letter to NRC, PNP 2015-061, *Palisades Nuclear Plant Fifth 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)*, dated August 28, 2015 (ADAMS Accession No. ML15240A053).
9. NRC letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 12, 2012 (ADAMS Accession No. ML12056A046).
10. Entergy Nuclear Operation, Inc. letter to NRC, PNP 2015-036, *Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding Recommendation 9.3, Emergency Preparedness - Staffing, Requested Information Items 1, 2, and 6 - Phase 2 Staffing Assessment*, dated May 19, 2015 (ADAMS Accession No. ML15142A546).
11. NRC letter, *Palisades Nuclear Plant – 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 (TAC Nos. MF0768 AND MF0769)*, dated October 13, 2015 (ADAMS Accession No. ML15272A324).
12. NEI 12-06, *Diverse and Flexible Coping Strategies (FLEX) Implementation Guide*, Revision 0, August 2012.