

## **NRR-PMDAPem Resource**

---

**From:** Wengert, Thomas  
**Sent:** Wednesday, August 03, 2016 4:52 PM  
**To:** Couture III, Philip; Drews, William  
**Cc:** mhawes@entergy.com; Anderson, Shaun; Anderson, Joseph; Norris, Michael; Hoffman, Raymond  
**Subject:** MF7347 - Supplemental Draft RAI Concerning LAR to Revise Permanently Defueled Emergency Plan for the James A FitzPatrick Nuclear Power Plant

**SUPPLEMENTAL DRAFT REQUEST FOR ADDITIONAL INFORMATION  
REGARDING REQUEST FOR LICENSE AMENDMENT TO REVISE PERMANENTLY DEFUELED  
EMERGENCY PLAN**

**ENERGY NUCLEAR OPERATIONS, INC  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT  
DOCKET NO. 50-333  
RENEWED FACILITY OPERATING LICENSE NO. DPR-59**

By letter dated February 4, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16043A427), as supplemented by letter dated July 6, 2016 (ADAMS Accession No. ML16188A388), Entergy Nuclear Operations, Inc. (ENOI or the licensee) submitted a request for U. S. Nuclear Regulatory Commission (NRC) approval of a license amendment request for the James A. FitzPatrick (JAF) Nuclear Power Plant concerning proposed changes to the Emergency Plan for the permanently defueled condition. On March 16, 2016, pursuant to 10 CFR 50.82(a)(1)(i), ENOI provided a formal notification to the NRC of its intention to permanently cease power operations of JAF on January 27, 2017 (ADAMS Accession No. ML16076A391). The proposed changes would revise the on-shift staffing and Emergency Response Organization staffing levels.

On August 3, 2016, the NRC staff conducted a clarification call with ENOI to clarify the licensee's July 6, 2016, RAI responses. The clarification call participants included:

Entergy  
Bill Drews  
James Jones  
David Daigle  
Pete Cullinan

NRC  
Joe Anderson, Chief, NSIR/DPR/ORLOB  
Shaun Anderson, Acting Chief, NRR/DORL/LPL4-2  
Tom Wengert – Fitzpatrick Project Manager, NRR/DORL/LPL4-2

As discussed in the clarification call, supplemental information is needed by the NRC staff to complete its evaluation. These RAIs are identified as draft at this time to confirm your understanding and of the information needed to complete our evaluation. If the request for information is understood, please respond to this request for additional information within 7 days of the date of this request, as discussed during the conference call.

Please call me at 301-415-4037 if you would like to set up a conference call to clarify the request for information.

The NRC will make this e-mail documenting the RAI clarification call and supplemental draft RAI publicly available by placing it in ADAMS via the NRC e-capture process.

1. Attachment 1 (Description and Evaluation of Proposed Changes) of ENO's February 4, 2016, submittal letter (page 11 of 36) under Section 3.2.1, Analysis of Proposed Changes / ERO Staffing, states:

*To validate the results of the analysis, drills will be developed and conducted prior to implementation of the changes described within. The drills will be conducted to confirm the ability of the post-shutdown ERO to perform the necessary functions of each emergency response facility and will utilize the post-shutdown procedures that will be developed depicting the revised assignment of duties. The drills will be used to train and qualify post-shutdown ERO members, evaluate and validate the ability to accomplish the stated mission of each emergency response facility, and ensure that the planning standard functions are preserved with no degradation in time sensitive activities or in the ability to communicate with offsite response organizations. The drills will also validate that the post-shutdown ERO continues to address the risks to public health and safety and comply with the JAF Emergency Plan, site commitments, and applicable regulations.*

To support NRC and FEMA's evaluation that proposed ERO staffing changes on the ability of the licensee to effectively implement the emergency plan, as revised, and to verify that changes pose no impact to offsite REP plans as currently approved by FEMA:

- a. Discuss whether a drill will be conducted involving a spent fuel pool event that tests the major elements of the licensee's emergency plan and communications/ coordination with offsite response organizations, including the at the Joint Information Center, prior to implementation, and
  - b. Discuss whether State and local response organizations will be offered the opportunity to participate, and the NRC and FEMA be provided advance notice and the opportunity to observe drill activities.
2. Attachment 1 of ENO's February 4, 2016, submittal letter (page 16 of 36) under Section 3.2.1.2, Analysis of Proposed Changes / ERO Staffing / Operations Support Center, states in part:

*The primary events of concern in the immediate post-shut-down and defueled condition will be a fuel handling accident and a loss of SFP cooling and/or water inventory. During fuel handling activities there will be extra personnel on site that will, were a fuel handling accident to occur, be able to respond to the event. Events involving a loss of SFP cooling and/or water inventory can be addressed by implementation of SFP inventory makeup strategies required under 10 CFR 50.54(hh)(2). These strategies also continue to be required as a license condition.*

The JAF analysis of proposed post-shutdown on-shift staffing only appears to address a fuel handling accident, which the licensee appears to define as mechanical damage to the spent fuel during handling or by impact with a heavy object as the only credible scenario for a gaseous release. Has an analysis been performed to verify that sufficient on-shift staffing would be available to promptly implement SFP inventory makeup strategies required under 10 CFR 50.54(hh)(2) if required without impacting the performance of designated EP functions?

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 2993

**Mail Envelope Properties** (Thomas.Wengert@nrc.gov20160803165200)

**Subject:** MF7347 - Supplemental Draft RAI Concerning LAR to Revise Permanently  
Defueled Emergency Plan for the James A FitzPatrick Nuclear Power Plant  
**Sent Date:** 8/3/2016 4:52:10 PM  
**Received Date:** 8/3/2016 4:52:00 PM  
**From:** Wengert, Thomas

**Created By:** Thomas.Wengert@nrc.gov

**Recipients:**

"mhawes@entergy.com" <mhawes@entergy.com>  
Tracking Status: None  
"Anderson, Shaun" <Shaun.Anderson@nrc.gov>  
Tracking Status: None  
"Anderson, Joseph" <Joseph.Anderson@nrc.gov>  
Tracking Status: None  
"Norris, Michael" <Michael.Norris@nrc.gov>  
Tracking Status: None  
"Hoffman, Raymond" <Raymond.Hoffman@nrc.gov>  
Tracking Status: None  
"Couture III, Philip" <pcoutur@entergy.com>  
Tracking Status: None  
"Drews, William" <WDrews1@entergy.com>  
Tracking Status: None

**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	5502	8/3/2016 4:52:00 PM

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**