



**Entergy Nuclear Northeast
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Brian R. Sullivan
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JAFP-16-0139
August 25, 2016

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Seventh 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)

James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
License No. DPR-059

- Reference:**
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
 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
 3. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012
 4. ENOI letter, JAFP-12-0124, 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), dated October 29, 2012
 5. ENOI letter, JAFP-13-0025, 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
 6. ENOI letter, JAFP-16-0045, Certification of Permanent Cessation of Power Operations, dated March 16, 2016

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order [Reference 1] to James A. FitzPatrick Nuclear Power Plant (JAF). Reference 1 was immediately effective and directed JAF 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.2. Reference 2 endorsed industry guidance document NEI 12-06, Revision 0 [Reference 3] with clarifications and exceptions identified in Reference 2. Reference 4 provided the JAF initial status report regarding mitigation strategies. Reference 5 provided the JAF overall integrated plan.

Reference 6 notified the NRC that Entergy had decided to permanently cease power operations of JAF in January 2017. This six-month status report reflects that decision. Entergy is evaluating its responses to Reference 1 in order to determine the appropriate actions in alignment with the decision to permanently cease power operations. The immediate impact to the six-month update report was to suspend all scheduled actions to allow the evaluation of what specific activities related to FLEX will be required. This is reflected in the milestone schedule by revising dates by inserting "to be determined" (TBD).

Recently the possible option to sell JAF in lieu of permanent cessation of power operation has transpired. Initial review and planning is underway to determine what actions are needed along with completion dates for compliance with NRC Order EA-12-049. However at this point, given no final decision has occurred, no significant changes to this six-month status report are currently warranted.

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. The purpose of this letter is to provide the seventh 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 attached 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.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact William Drews, Regulatory Assurance Manager, at 315-349-6562.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 25th day of August, 2016.

Sincerely,



Brian R. Sullivan
Site Vice President

BRS/WCD/mh

Attachment: James A. FitzPatrick Nuclear Power Plant's (JAF) Seventh 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

cc: Director, Office of Nuclear Reactor Regulation
NRC Region I Administrator
NRC Resident Inspector
NRC Project Manager
NYSPSC
NYSERDA

JAFP-16-0139

Attachment

James A. FitzPatrick Nuclear Power Plant's (JAF) Seventh 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

(11 Pages)

James A. FitzPatrick Nuclear Power Plant's (JAF) Seventh 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

James A. FitzPatrick Nuclear Power Plant (JAF) developed an Overall Integrated Plan (Reference 1 in Section 8), documenting 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 11), 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 January 31, 2016, and are current as of July 31, 2016.

- Sixth Six-Month Status Report – February 2016 (JAFP-16-0027)

3. Milestone Schedule Status

Following is 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
60-day Status Update	October 29, 2012	Complete	
Submit Overall Integrated Plan	February 28, 2013	Complete	
Six-Month Status Report	August 2013	Complete	
Refine Strategies	December 2014	Complete	
Perform Staffing Analysis	TBD**	In progress	
Develop Strategies / Contract with RRC	TBD**	Started	
Six-Month Status Report	February 2014	Complete	
Develop Mods	TBD**	Started	
Draft Implementing Procedures	TBD**	Not Started	
Regional Response Center Operational	July 2015	Complete	
Develop Storage Plan	TBD**	Started	
Purchase FLEX Equipment	TBD**	Not Started	
Issue Maintenance Procedures (for FLEX equipment)	TBD**	Not Started	
Six-Month Status Report	August 2014	Complete	
Develop Training Plan	TBD**	Not Started	

James A. FitzPatrick Nuclear Power Plant's (JAF) Seventh 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

Milestone	Target Completion Date*	Activity Status	Revised Target Completion Date
Refueling Outage 1	Fall 2014	Complete	
Six-Month Status Report	February 2015	Complete	
Implement Training	TBD**	Not Started	
Implement Mods (non-outage)	TBD**	Not Started	
Six-Month Status Report	August 2015	Complete	
Six-Month Status Report	February 2016	Complete	
Issue Implementing Procedures	TBD**	Not Started	
Six-Month Status Report	August 2016	Complete	
Implement Mods (outage)	TBD**	Not Started	
Implement Training Updates	TBD**	Not Started	
Refueling Outage 2 (full implementation)	TBD**	Not Started	
Validation / Demonstration	TBD**	Not Started	

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

**These milestones are being reassessed and revised target completion dates will be determined and included in a future six-month update (see Section 4).

4. Changes to Compliance Method

On March 16, 2016, Entergy notified the NRC that it had decided to permanently cease power operations of JAF in January 2017. Entergy is evaluating its responses to Reference 2 in order to determine the appropriate actions in alignment with the decision to permanently cease power operations.

Recently the possible option to sell JAF in lieu of permanent cessation of power operation has transpired. Initial review and planning is underway to determine what actions are needed along with completion dates for compliance with NRC Order EA-12-049. However at this point, given no final decision has occurred, no significant changes to this six-month status report are currently warranted.

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

JAF will submit a plan that resolves any issues relative to order implementation. This plan may include a relief/relaxation request.

James A. FitzPatrick Nuclear Power Plant's (JAF) Seventh 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

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

Note: The following tables are included for completeness. The 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) (Reference 4). A fourth table includes the status of each FitzPatrick Audit Question (AQ) for the Mitigation Strategies (FLEX) Order.

Table 1: Overall Integrated Plan Open Items	
Overall Integrated Plan Open Items	Status
OI-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.	Complete/Closed Entergy has determined that update to existing licensing basis documents are not required to reflect BDBEEs.
OI-2: The structure, content and details of the Regional Response Center playbook will be determined.	Started

Table 2: Interim Staff Evaluation Open Items		
Interim Staff Evaluation Open Items		Status
3.1.1.3.A	Procedural Interface (Seismic Hazard) - Evaluate the impacts from large internal flooding sources.	Complete (Associated with AQ JAF-005 response).
3.1.3.1.A	Protection of FLEX Equipment (High Wind Hazard) - Evaluate the separation distance and the axis of separation considering the predominant path of tornados in the geographic area to demonstrate that at least N sets of FLEX equipment would remain deployable in the context of a tornado missile hazard.	Open. (Associated with AQ JAF-001)
3.1.4.2.B	Deployment of FLEX Equipment (Snow, Ice and Extreme Cold) - Evaluate the potential impact on the UHS due to ice blockage or formation of frazil ice as a result of extreme cold.	Complete. This item is addressed on the updated AQ response spreadsheet on the ePortal.

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Table 2: Interim Staff Evaluation Open Items		
Interim Staff Evaluation Open Items		Status
3.2.3.A	Containment- Verify that the implementation of Boiling Water Reactor Owners Group (BWROG) Emergency Procedure Guideline (EPG)/Severe Accident Guideline (SAG), Revision 3, including any associated plant-specific evaluations, has been completed in accordance with the provisions of NRC letter dated January 9, 2014 (Reference 23 of ISE - Letter from Jack R. Davis (NRC) to Joseph E. Pollock (NEI) dated January 9, 2014, regarding Boiling Water Reactor Containment Venting (ADAMS Accession No. ML 13358A206))	Open. (Associated with AQ JAF-017)

Table 3: Interim Staff Evaluation Confirmatory Items		
Interim Staff Evaluation Confirmatory Items		Status
3.1.1.2.A	Deployment of FLEX Equipment- Confirm that soil liquefaction will not impede vehicle movement following a seismic event.	Open. (Associated with AQ JAF-002)
3.1.1.2.B	Deployment of FLEX Equipment- Confirm final design features of the new storage building including the susceptibility to the loss of ac power to deploy equipment.	Open. (Associated with AQ JAF-001)
3.1.1.2.C	Deployment of FLEX Equipment - Confirm the storage locations and means of protection against the seismic hazard of the super duty pickup trucks and the two flatbed trailers used for deployment of FLEX equipment.	Open. (Associated with AQ JAF-001)
3.1.1.4.A	Offsite Resources- Confirm location of offsite staging area(s), access routes and methods of delivery of equipment to the site considering the seismic, flood, high wind, snow, ice and extreme cold hazards.	Open. (Associated with AQ JAF-043)
3.1.3.2.A	Deployment of FLEX Equipment (High Wind Hazard) - Confirm availability of debris removal equipment to facilitate deployment of FLEX equipment.	Complete This item is addressed on the AQ response spreadsheet on the ePortal.
3.1.3.2.B	Deployment of FLEX Equipment (High Wind Hazard) - Confirm protection of the means to move FLEX equipment.	Open. (Associated with AQ JAF-001)

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Table 3: Interim Staff Evaluation Confirmatory Items		
Interim Staff Evaluation Confirmatory Items		Status
3.1.4.2.A	Deployment of FLEX Equipment (Snow, Ice and Extreme Cold) - Confirm availability of snow removal equipment to facilitate deployment of FLEX equipment.	Open. (Associated with AQ JAF-001)
3.2.1.1.A	Computer Code Used for Extended Loss of AC Power (ELAP) Analysis - Benchmarks need to be identified and discussed which demonstrate that Modular Accident Analysis Program (MAAP) is an appropriate code for the simulation of an ELAP event at JAF.	Complete. (Associated with AQ JAF-009 response)
3.2.1.1.B	Computer Code Used for ELAP Analysis - Confirm that the collapsed level remains above Top of Active Fuel (TAF) and the cool down rate is within technical specifications limits.	Complete. (Associated with AQ JAF-012 response)
3.2.1.1.C	Computer Code Used for ELAP Analysis - Confirm that MAAP was 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. ML 13190A201).	Complete. (Associated with AQ JAF-010 response)
3.2.1.1.D	Computer Code Used for ELAP Analysis - Confirm that the licensee, in using MAAP, identified and justified 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 1 020236).	Complete. (Associated with AQ JAF-011 response)
3.2.1.1.E	Computer Code Used for ELAP Analysis - Confirm that the specific MAAP analysis case that was used to validate the timing of mitigating strategies in the Integrated Plan has been identified and is available for NRC staff to review. Alternately, a comparable level of information has been included in the supplemental response. In either case, the analysis should include a plot of the collapsed vessel level to confirm that TAF is not reached (the elevation of the TAF should be provided) and a plot of the temperature cool down to confirm that the cool down is within technical specifications limits.	Complete. (Associated with AQ JAF-009 response)
3.2.1.2.A	Recirculation Pump Seal Leakage Models - Confirm the seal leakage model used in the updated MAAP analysis (which will address the MAAP code limitations when used for ELAP analysis). Evaluate the seal leakage rate model used, the details of the seal qualification tests and supporting test data, and leakage rate pressure-dependence.	Complete. (Associated with AQ JAF-014 response)

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Table 3: Interim Staff Evaluation Confirmatory Items		
Interim Staff Evaluation Confirmatory Items		Status
3.2.1.3.A	Sequence of Events (SOE) - Confirm the SOE timeline after reanalysis using the MAAP code which will address the limitations when used for the ELAP analysis.	Complete. (Associated with AQ JAF-012 response)
3.2.1.4.A	Systems and Components for Consequence Mitigation - Confirm sizing of the FLEX pumps and 600 Vac FLEX diesel generator (DG) and the 4160 Vac generator to be obtained from the RRC.	Open. (Associated with AQ JAF-022)
3.2.1.5.A	Monitoring Instrumentation and Controls- Confirm ac powered torus temperature, pressure and level and drywell temperature and pressure instrumentation is modified to remain powered during an ELAP.	Complete. (Associated with AQ JAF-006 response)
3.2.1.8.A	Use of Portable Pumps - Confirm that the use of raw water from Lake Ontario for long term core and spent fuel pool cooling strategies is acceptable.	Complete. (Associated with AQ JAF-023 response)
3.2.2.A	Spent Fuel Pool Cooling - Confirm the method of ventilation and power requirements, if any, of the spent fuel pool area.	Complete. (Associated with AQ JAF-028 response)
3.2.4.2.A	Ventilation (Equipment Cooling) - Confirm that additional evaluations of the RCIC room temperature demonstrate that an acceptable environment is maintained during the transition phase both for equipment in the room and habitability for operators who may need to enter the room.	Complete. (Associated with AQ JAF-031 response)
3.2.4.2.B	Ventilation (Equipment Cooling) - Confirm that evaluations of the battery room temperature demonstrate that an acceptable environment, during both high ambient temperature and during extreme cold ambient temperature, is maintained during Phases 2 and 3.	Complete. (Associated with AQ JAF-069 response)
3.2.4.2.C	Ventilation (Equipment Cooling) - Confirm the required ventilation flow or the size of the portable fans to maintain acceptable environmental conditions in the DC equipment room.	Complete. (Associated with AQ JAF-061 response)
3.2.4.3.A	Heat Tracing - Confirm completion of walkdowns and evaluation of where heat tracing may be needed for freeze protection of equipment or instruments used in the ELAP mitigation strategies.	Open. (Associated with AQ JAF-035)

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Table 3: Interim Staff Evaluation Confirmatory Items		
Interim Staff Evaluation Confirmatory Items		Status
3.2.4.4.A	Lighting - Confirm need for additional portable lighting, such as dc powered lights.	Open. (Associated with AQ JAF-036)
3.2.4.4.B	Communications - Confirm that upgrades to the site's communication system have been completed.	NRC Confirmatory Action
3.2.4.8.A	Electrical Power Sources - Confirm the technical basis for the selection and size of the FLEX generators to be used in support of the coping strategies.	Open. (Associated with AQ JAF-050)
3.2.4.10.A	Load Reduction to Conserve DC Power - Confirm final load shed list and the evaluation of any potential adverse effects of shedding those loads.	Open. (Associated with AQ JAF-052)
3.2.4.10.B	Load Reduction to Conserve DC Power - Confirm the final dc load profile with the required loads and the finalized minimum battery voltage.	Open. (Associated with AQ JAF-066)
3.2.4.10.C	Load Reduction to Conserve DC Power- Confirm time after the ELAP for connecting the FLEX DG to the battery chargers.	Open. (Associated with AQ JAF-052)
3.4.A	Off-site Resources- Confirm that NEI 12-06, Section 12.2 guidelines 2 through 10 are addressed, or that an appropriate alternative is justified.	Open. (Associated with AQ JAF-043)

James A. FitzPatrick Nuclear Power Plant's (JAF) Seventh 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

Table 4: Audit Question Status

Audit Questions	Status	Completion or Target Date
JAF-001	Open - This AQ response will be updated when information is available (associated with ISE Open Item 3.1.3.1.A and ISE Confirmatory Items 3.1.1.2.B, 3.1.1.2.C, 3.1.3.2.B, 3.1.4.2.A)	TBD
JAF-002	Open - This AQ response will be updated when information is available (associated with ISE Confirmatory Item 3.1.1.2.A)	TBD
JAF-003	Open	TBD
JAF-004	Open	TBD
JAF-005	Closed* Response available on the ePortal (associated with ISE Open Item 3.1.1.3.A)	Closed
JAF-006	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.5.A)	Closed
JAF-008	Open	TBD
JAF-009	Closed* Response available on the ePortal (associated with ISE Confirmatory Items 3.2.1.1.A, 3.2.1.1.E)	Closed
JAF-010	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.1.C)	Closed
JAF-011	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.1.D)	Closed
JAF-012	Closed* Response available on the ePortal (associated with ISE Confirmatory Items 3.2.1.1.B, 3.2.1.3.A)	Closed
JAF-013	Closed* Response available on the ePortal	Closed
JAF-014	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.2.A)	Closed
JAF-015	Closed* Response available on the ePortal	Closed
JAF-016	Closed* Response available on the ePortal	Closed
JAF-017	Open (associated with ISE Open Item 3.2.3.A)	TBD
JAF-018	Closed* Response available on the ePortal	Closed
JAF-019	Closed* Response available on the ePortal	Closed
JAF-021	Closed* response available on the ePortal	Closed
JAF-022	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.4.A)	Closed
JAF-023	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.8.A)	Closed

James A. FitzPatrick Nuclear Power Plant's (JAF) Seventh 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

Table 4: Audit Question Status

Audit Questions	Status	Completion or Target Date
JAF-026	Closed* Response available on the ePortal	Closed
JAF-027	Closed* Response available on the ePortal	Closed
JAF-028	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.2.A)	Closed
JAF-029	Closed* Response available on the ePortal	Closed
JAF-031	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.4.2.A)	Closed
JAF-032	Closed* Response available on the ePortal	Closed
JAF-033	Closed* Response available on the ePortal	Closed
JAF-034	Closed* Response available on the ePortal	Closed
JAF-035	Open (associated with ISE Confirmatory Item 3.2.4.3.A)	TBD
JAF-036	Open (associated with ISE Confirmatory Item 3.2.4.4.A)	TBD
JAF-037	Closed* Response available on the ePortal	Closed
JAF-038	Closed* Response available on the ePortal	Closed
JAF-040	Closed* Response available on the ePortal	Closed
JAF-043	Open (associated with ISE Confirmatory Items 3.1.1.4.A, 3.4.A)	TBD
JAF-046	Closed* Response available on the ePortal	Closed
JAF-049	Closed* Response available on the ePortal	Closed
JAF-050	Open (associated with ISE Confirmatory Item 3.2.4.8.A)	TBD
JAF-052	Open (associated with ISE Confirmatory Items 3.2.4.10.A, 3.2.4.10.C)	TBD
JAF-053	Closed* Response available on the ePortal	Closed
JAF-055	Closed* Response available on the ePortal	Closed
JAF-056	Open	TBD
JAF-057	Closed* Response available on the ePortal	Closed
JAF-058	Open	TBD
JAF-059	Closed* Response available on the ePortal	Closed
JAF-060	Open	TBD
JAF-061	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.4.2.C)	Closed

James A. FitzPatrick Nuclear Power Plant's (JAF) Seventh 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

Table 4: Audit Question Status		
Audit Questions	Status	Completion or Target Date
JAF-062	Open	TBD
JAF-063	Closed* Response available on the ePortal	Closed
JAF-064	Open	TBD
JAF-065	Open	TBD
JAF-066	Open (associated with ISE Confirmatory Item 3.2.4.10.B)	TBD
JAF-068	Closed* Response available on the ePortal	Closed
JAF-069	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.4.2.B)	Closed
JAF-071	Closed* Response available on the ePortal	Closed
JAF-072	Closed* Response available on the ePortal	Closed
JAF-073	Closed* Response available on the ePortal	Closed

*Closed indicates that Entergy's response is complete.

7. Potential Interim Staff Evaluation Impacts

Entergy is currently evaluating its responses to Reference 2 in order to determine the appropriate actions in alignment with the decision to permanently cease power operations (Reference 9). Therefore, Entergy has not yet identified any additional potential impacts to the Interim Staff Evaluation since the previous six month status report (Reference 11).

James A. FitzPatrick Nuclear Power Plant's (JAF) Seventh 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

8. References

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

1. Entergy to NRC, JAFP-13-0025, 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
2. 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
3. Entergy to NRC, JAFP-13-0112, 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
4. NRC letter, James A. FitzPatrick Nuclear Power Plant – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC No. MF1077), dated February 21, 2014
5. Entergy to NRC, JAFP-14-0023, 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
6. Entergy to NRC, JAFP-14-0105, 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
7. Entergy to NRC, JAFP-15-0026, 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
8. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012
9. Entergy to NRC, JAFP-16-0045, Certification of Permanent Cessation of Power Operations, dated March 16, 2016
10. Entergy to NRC, JAFP-15-0104, 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
11. Entergy to NRC, JAFP-16-0027, Sixth 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 26, 2016