



September 15, 2016

NG-16-0178
10 CFR 2.202

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

Duane Arnold Energy Center
Docket No. 50-331
Renewed Op. License No. DPR-49

Subject: Response to Request for Additional Information Relating to Beyond Design Bases External Event Staffing Study

References:

1. Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (ML12056A045)
2. 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, (ML12073A348)
3. NEI 12-01, Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities (ML12125A412)
4. Letter, T.A. Vehec (NextEra Energy Duane Arnold, LLC) to U. S. NRC, "FLEX Strategies Phase 2 Staffing Assessment," NG-16-0120, dated June 3, 2016 (ML16159A235)

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Reference 1, an immediately effective Order to all licensees including NextEra Energy Duane Arnold, LLC (hereafter NextEra Energy Duane Arnold). In Reference 2, the NRC requested information on staffing requirements necessary to mitigate a beyond design bases natural event consistent with Reference 1. In Reference 3, the nuclear industry provided guidelines for how to assess these capabilities. In Reference 4, NextEra Energy Duane Arnold provided the information requested in Reference 2 developed consistent with Reference 3.

In a conference call on August 17, 2016, the NRC staff requested clarification of several items contained in Reference 4. The enclosure to this letter provides the clarifying details requested by the NRC staff.

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If you have any questions regarding this matter, please contact Mr. Mike Davis,
Licensing Manager at (319) 851-7032.



T. A. Vehec
Vice President, Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC

Enclosure

cc: Regional Administrator, USNRC, Region III
Resident Inspector, USNRC, Duane Arnold Energy Center
Project Manager, USNRC, Duane Arnold Energy Center

Enclosure to NG-16-0178

NextEra Energy Duane Arnold, LLC's Clarifying Information Related to Beyond
Design Bases External Event Staffing Study

1 page follows

Clarification Item 1: What is the normal security role of the “Auxiliary Responder” individuals listed on page 19 of the staffing study?

DAEC Response: The normal security role of the “Auxiliary Responder” is a security Watchperson.

Clarification Item 2: On page 16 of the staffing study, what is being referred to as the “alternative” approach?

DAEC Response: The “alternative” approach referenced is NextEra fleet procedure SY-AA-102-1038, “Alternative Security Approach For Beyond-Design-Basis External Events”. This procedure provides administrative guidance for security personnel under Beyond-Design-Basis events.

Clarification Item 3: On page 16 of the staffing study, DAEC made reference to “relaxed” security postures and security functions. Are actions beyond 10 CFR 73.55(g)(5)(ii) planned as part of the FLEX implementing strategies?

DAEC Response: No relaxation of security postures and security functions beyond 10CFR73.55(g)(5)(ii) is planned as part of the FLEX implementing strategies.