



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 18, 2017

Operating Reactor Licensees on
the enclosed list

SUBJECT: NUCLEAR REGULATORY COMMISSION PLAN FOR THE AUDIT OF LICENSEES' RESPONSES CONCERNING FLOODING HAZARD REEVALUATIONS RELATED TO REQUEST FOR INFORMATION PURSUANT TO TITLE 10 OF THE CODE OF FEDERAL REGULATIONS SECTION 50.54(f) REGARDING RECOMMENDATION 2.1 OF THE NEAR-TERM TASK FORCE REVIEW OF INSIGHTS FROM THE FUKUSHIMA DAI-ICHI ACCIDENT

This letter documents the U.S. Nuclear Regulatory Commission (NRC) staff's plan to perform regulatory audits of licensees' responses concerning flooding hazard reevaluations (including focused evaluations (FEs) and integrated assessments (IAs)), which are being completed as part of implementing lessons learned from the 2011 accident at the Fukushima Dai-ichi plant in Japan. These audits will be conducted on an as-needed basis to support the NRC staff's review of licensees' FEs and IAs associated with their reevaluated flood hazard information.

BACKGROUND

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340), the NRC issued a request for information pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) (hereafter referred to as the 50.54(f) letter). Enclosure 2 to the 50.54(f) letter requested that licensees reevaluate the flood hazards for their sites using present-day methods and regulatory guidance used by the NRC staff when reviewing applications for early site permits and combined licenses. If the reevaluated hazard for any flood-causing mechanism is not bounded by the plant's current design basis (CDB) flood hazard, an additional assessment of plant response would be necessary. Specifically, the 50.54(f) letter states that an IA should be submitted, and described the information that the IA should contain. By letter dated November 30, 2012 (ADAMS Accession No. ML12311A214), the NRC staff issued Japan Lessons-Learned Division (JLD) interim staff guidance (ISG) JLD-ISG-12-05, "Guidance for Performing the Integrated Assessment for External Flooding," to facilitate the conduct of the IAs.

On June 30, 2015, the NRC staff issued COMSECY-15-0019, "Closure Plan for the Reevaluation of Flooding Hazards for Operating Nuclear Power Plants," describing the closure plan for the reevaluation of flooding hazards for operating nuclear power plants (ADAMS Accession No. ML15153A104). The Commission approved the closure plan on July 28, 2015 (ADAMS Accession No. ML15209A682). COMSECY-15-0019 outlines a revised process for addressing cases in which the reevaluated flood hazard is not bounded by the plant's CDB. The revised process describes a graded approach in which licensees with hazards exceeding their CDB flood will not be required to complete an IA, but instead will perform an FE.

Nuclear Energy Institute (NEI) 16-05, Revision 1, "External Flooding Assessment Guidelines" (ADAMS Accession No. ML16165A178), has been endorsed by the NRC as an appropriate methodology for licensees to perform the FE and IA in response to the 50.54(f) letter consistent with the process outlined in COMSECY-15-0019. The NRC's endorsement of NEI 16-05, including

exceptions, clarifications, and additions, is described in NRC JLD-ISG-2016-01, "Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flood Hazard Reevaluation" (ADAMS Accession No. ML16090A140).

AUDIT PLAN

The audit plan outlines the process that the NRC staff will use to request and review additional information that is necessary to supplement the flood hazard reevaluation FE and IA submittals and resolve potential technical questions consistent with the guidance found in NEI 16-05, Revision 1, and JLD-ISG-2016-01. Audits will be performed on a plant-specific basis and only if it is necessary to support the NRC staff's review of the submitted information. As part of the audit process, NRC staff members may be contacting licensees to discuss topics relevant to the existing docketed submittals, as well as information that may be contained in the ePortal system. This audit process will provide the NRC staff with a better understanding of the submitted flood information and the potential effects on the site. Specifically, the audits will be used to confirm that the information submitted by the licensee has adequately addressed the reevaluated flood hazards with respect to the scope and intent of the 50.54(f) letter request.

The audits will be performed consistent with NRC Office of Nuclear Reactor Regulation Office Instruction LIC-111, "Regulatory Audits," dated December 29, 2008 (ADAMS Accession No. ML082900195), and may be conducted over multiple sessions, as needed.

REGULATORY AUDIT SCOPE AND METHODOLOGY

The areas of focus for the regulatory audit are the information contained in the flooding FE and IA submittals, as applicable, and associated and relevant supporting documentation used in the development of the aforementioned documents including, but not limited to, methodology, process information, calculations, computer models, etc.

NRC AUDIT TEAM:

Title	Team Member	Affiliation
Team Leader, NRR/JLD	Various Staff Members	NRC
Branch Chief, NRR/JLD/JHMB	Nathan Sanfilippo	NRC
Technical Staff, NRR/JLD	Various Staff Members	NRC

LOGISTICS:

The audit meetings will be coordinated with each licensee contact.

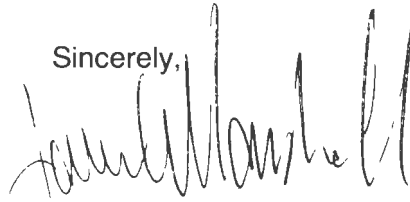
DELIVERABLES:

The NRC team will develop an audit summary report. The report will be placed in ADAMS within 90 days of the completion of the final audit session, and will be publicly available.

The information discussed in the audit may be included, fully or in part, in the development of the NRC staff's evaluation of the licensees' reevaluated flood hazard FE and IA submittals.

If you have any questions, please contact Nathan Sanfilippo at (301) 415 - 8744 or by e-mail at Nathan.Sanfilippo@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jane E. Marshall". The signature is fluid and cursive, with a large initial "J" and "M".

Jane E. Marshall, Director
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Enclosure: List of Operating Reactor Licensees

cc w/encl: Distribution via Listserv
NEI

LIST OF OPERATING REACTOR LICENSEES

Arkansas Nuclear One, Units 1 and 2

Entergy Operations, Inc.
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6

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Entergy Operations, Inc.
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Beaver Valley Power Station, Units 1 and 2

FirstEnergy Nuclear Operating Company
Docket Nos. 50-334 and 50-412
License Nos. DPR-66 and NPF-73

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Browns Ferry Nuclear Plant, Units 1, 2, and 3

Tennessee Valley Authority
Docket Nos. 50-259, 50-260, and 50-296
License Nos. DPR-33, DPR-52, and DPR-68

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Brunswick Steam Electric Plant, Units 1 and 2

Duke Energy Progress, LLC
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License Nos. DPR-71 and DPR-62

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Calvert Cliffs Nuclear Power Plant, Units 1 and 2

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License Nos. DPR-53 and DPR-69

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President and Chief Nuclear Officer
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Catawba Nuclear Station, Units 1 and 2

Duke Energy Carolinas, LLC
Docket Nos. 50-413 and 50-414
License Nos. NPF-35 and NPF-52

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Columbia Generating Station

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Comanche Peak Nuclear Power Plant, Units 1 and 2

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Diablo Canyon Power Plant, Units 1 and 2

Pacific Gas and Electric Company
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Donald C. Cook Nuclear Plant, Units 1 and 2

Indiana Michigan Power Company
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74

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Dresden Nuclear Power Station, Units 2 and 3

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License Nos. DPR-57 and NPF-5

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Indian Point Nuclear Generating Units 2, and 3

Entergy Nuclear Operations, Inc.
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License Nos. DPR-26 and DPR-64

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License Nos. NPF-2 and NPF-8

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License Nos. NPF-9 and NPF-17

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Millstone Power Station, Units 2 and 3

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Nine Mile Point Nuclear Station, Units 1 and 2

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License Nos. DPR-63 and NPF-69

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North Anna Power Station, Units 1 and 2

Virginia Electric and Power Company
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License Nos. NPF-4 and NPF-7

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Palisades Nuclear Plant

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License No. DPR-20

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Palo Verde Nuclear Generating Station, Units
1, 2, and 3

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Docket Nos. STN 50-528, STN 50-529,
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License Nos. NPF-41, NPF-51, and NPF-74

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Peach Bottom Atomic Power Station, Units 2 and 3

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License Nos. DPR-44 and DPR-56

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License Nos. DPR-24 and DPR-27

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Prairie Island Nuclear Generating Plant, Units 1 and 2

Northern States Power Company - Minnesota
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St. Lucie Plant, Units 1 and 2

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Surry Power Station, Units 1 and 2

Virginia Electric and Power Company
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Three Mile Island Nuclear Station, Unit 1

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License No. DPR-50

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Turkey Point Nuclear Generating Units 3 and 4

Florida Power and Light Company
Docket Nos. 50-250 and 50-251
License Nos. DPR-31 and DPR-41

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Virgil C. Summer Nuclear Station, Unit 1
South Carolina Electric & Gas Company
Docket No. 50-395
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Waterford Steam Electric Station, Unit 3
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Watts Bar Nuclear Plant, Units 1 and 2
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NUCLEAR REGULATORY COMMISSION PLAN FOR THE AUDIT OF LICENSEES' RESPONSES CONCERNING FLOODING HAZARD REEVALUATIONS RELATED TO REQUEST FOR INFORMATION PURSUANT TO TITLE 10 OF THE CODE OF FEDERAL REGULATIONS SECTION 50.54(f) REGARDING RECOMMENDATION 2.1 OF THE NEAR-TERM TASK FORCE REVIEW OF INSIGHTS FROM THE FUKUSHIMA DAI-ICHI ACCIDENT DATED July 18, 2017

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RidsNrrJLDResource	RidsNrrPMMillstone	FVega, NRR
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RidsNrrLAIBetts	RidsNrrPMPeachBottom	
RidsNrrPMANO	RidsNrrPMPerry	
RidsNrrPMBeaverValley	RidsNrrPMPilgrim	
RidsNrrPMBrownsFerry	RidsNrrPMPPointBeach	
RidsNrrPMBrunswick	RidsNrrPMPrairieIsland	
RidsNrrPMCalvertCliffs	RidsNrrPMQuadCities	
RidsNrrPMCatawba	RidsNrrPMREGinna	
RidsNrrPMColumbia	RidsNrrPMRiverBend	
RidsNrrPMComanchePeak	RidsNrrPMRobinson	
RidsNrrPMCooper	RidsNrrPMSalem	
RidsNrrPMDCCook	RidsNrrPMSeabrook	

ADAMS Accession No.: ML17192A452

*via email

OFFICE	NRR/JLD/JHMB/PM	NRR/JLD//LA	NRR/JLD/JHMS/B	NRR/JLD/D	NRR/JLD/D
NAME	JSebrosky	Slent	NSanfilippo	MShams	JMarshall
DATE	7/12/17	7/11/2017	7/12/17	7/13/17	7/18/17

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