

September 27, 2017

Vanessa Quinn, Chief
Radiological Emergency Preparedness Branch
Technological Hazards Division
Federal Emergency Management Agency – Area 8
400 C Street, South West
Washington, DC 20024

SUBJECT: FEDERAL EMERGENCY MANAGEMENT AGENCY REVIEW REQUESTED OF
PROPOSED CHANGES TO THE PALISADES NUCLEAR PLANT EMERGENCY
PLAN FOR PERMANENTLY DEFUELED CONDITION

Dear Ms. Quinn:

By letter dated January 4, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17004A062), Entergy Nuclear Operations, Inc. (ENO) provided formal notification to the U.S. Nuclear Regulatory Commission (NRC) of ENO's determination to permanently cease power operations at the Palisades Nuclear Plant (PNP) on October 1, 2018, pursuant to §50.82(a)(1)(i) and §50.4(b)(8) to Title 10 of the *Code of Federal Regulations* (10 CFR). In preparation for the permanent cessation of operations at PNP, by letter dated August 31, 2017 (ADAMS Accession No. ML17248A389), ENO submitted for NRC approval, a license amendment request (LAR) to the PNP Site Emergency Plan (SEP). The proposed changes to the PNP Site Emergency Plan would eliminate specific licensee on-shift and augmented emergency response organization (ERO) positions, based on written certification to the NRC under 10 CFR 50.82(a)(1) of the permanent cessation of reactor operation and transfer of spent fuel from the reactor vessel. The proposed licensee on-shift and augmented ERO staffing changes are commensurate with the reduced spectrum of credible accidents from that of an operating power reactor or a power reactor with fuel remaining in the reactor vessel. These proposed changes are not associated with any requests for exemption to NRC regulations and must continue to meet the standards of 10 CFR 50.47, "Emergency plans," and the requirements of Appendix E to 10 CFR Part 50, "Emergency Planning and Preparedness for Production and Utilization Facilities."

Attachment 1 to Entergy's August 31, 2017 letter, provides a description and evaluation of the proposed licensee ERO staffing changes. Table 1, "Proposed Post-Shutdown Augmented ERO Staffing," to Attachment 1, provides a comparison of the current augmented ERO positions against the proposed post-shutdown augmented ERO positions. Section 3.2.3, "Impact on Off-Site Response Organizations" to Attachment 1, provides ENO's evaluation of impact of the proposed licensee ERO staffing changes against the existing Federal Emergency Management Agency (FEMA)-approved radiological emergency preparedness (REP) plans for the State of Michigan and the Counties of Berrien, Allegan and Van Buren.

ENO states that on June 6, 2017, a meeting with these various Federal, State and local agencies was conducted to discuss the proposed changes. Feedback from the State and local agencies is provided in Attachment 8, "State and Local Agency Correspondence on Post-Shutdown Emergency Plan License Amendment Request Meeting," to Entergy's August 31, 2017 letter. The following agencies responded with formal letters, contained in Attachment 8, noting that the changes are not expected to impact their ability to effectively implement their FEMA-approved REP plans:

- Michigan State Police,
- Berrien County Emergency Management,
- Van Buren County Office of Domestic Preparedness, and
- Allegan County Emergency Management Department.

The NRC's initial review of the proposed PNP SEP indicates that these changes would not impact the methods or timing for the notification of State and local agencies of an emergency declaration and/or offsite protective action recommendation, offsite radiological monitoring and assessment capabilities, or the current location of licensee emergency response facilities. However, due to the extent of proposed changes to the licensee's ERO staffing, specifically at the PNP Emergency Operations Facility and Joint Information Center, I am requesting FEMA's review of the proposed licensee staffing changes to verify that no potential adverse impacts exist that would preclude the effective implementation of State and local REP plans.

Per their August 31, 2017 letter, ENO requested approval of the proposed license amendment by October 1, 2018, and a 90-day implementation period following the effective date of the amendment. ENO requested the approved amendment become effective following submittal of the required 10 CFR 50.82(a)(1)(ii) certification that the PNP reactor vessel has been permanently defueled. Based on the number of on-going and projected decommissioning related licensing actions, I am requesting that FEMA provide its assessment to the NRC by no later than December 15, 2017, to support any further request for additional information to ENO.

In Section 3.2.2 (Page 21 of 35) of Attachment 1 to their August 31, 2017 letter, ENO states, in part:

To validate the results of the proposed changes to the augmented ERO described within, and the analysis presented in Attachment 6, one or more drills will be developed and conducted prior to implementation of the changes described within this LAR. The drills will be conducted to confirm the ability of the post-shutdown augmented ERO to perform the necessary functions of each ERF [*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 augmented ERO members, evaluate and validate the ability to accomplish the stated mission of each ERF, and ensure that the planning standard functions are preserved with no degradation in time-sensitive activities or in the ability to communicate with OROs...

...Major elements to be tested will include communications and coordination with OROs, including the JIC. State, County, and Federal response organizations will be provided the opportunity to participate in or observe the drills, as applicable...

PNP has not yet finalized a schedule of drills that will be conducted. PNP will provide the schedule to the NRC with appropriate advanced notice, thereby allowing the NRC and FEMA an opportunity to observe each drill...

As always, thank you for your assistance. If you have any questions regarding the specifics of the changes requested to the PNP SEP; the NRC's evaluation of these proposed changes, or if FEMA will be unable to meet the requested due date of December 15, 2017, please contact Richard Kinard at (301) 287-3768.

Sincerely,

/RA/

Joseph D. Anderson, Chief
Reactor Licensing Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

cc: C. Fiore, FEMA HQ

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DATED: 09/27/17

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