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GNRO-2017/00065

September 27, 2017

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

SUBJECT: Amended Emergency Plan 50.54(q) (3) for Revision 75  
Grand Gulf Nuclear Station, Unit 1  
Docket No. 50-416  
License No. NPF-29

REFERENCE: Entergy Letter to NRC, "Emergency Plan Revision 75," dated March 27,  
2017 (GNRO-2017/00015)

Dear Sir or Madam:

Entergy Operation Inc., (Entergy) submits its Emergency Plan and all subsequent changes to it in accordance with 10 CFR 50.54(q) (1) (ii). Grand Gulf Nuclear Station (GGNS) determined the 10 CFR 50.54(q) (3) Evaluation for Emergency Plan, Revision 75 (Reference) should be enhanced to add detail to enable an independent reviewer to aid in independent review. This letter makes a correction to the Evaluation submitted on March 27, 2017.

This letter contains no new Regulatory Commitments. Should you have any questions concerning the content of this letter, please contact Douglas Neve, Regulatory Assurance Manager, at (601)-437-2103.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Neve", with a stylized flourish at the end.

Douglas A. Neve  
Regulatory Assurance Manager  
Grand Gulf Nuclear Station  
DAN/sas

Attachment: 10C CFR 50.54(q) (3) Evaluation for GGNS Emergency Plan, Revision 75

cc:

Mr. Scott Morris  
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NRC Senior Resident Inspector  
Grand Gulf Nuclear Station  
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**Attachment to GNRO-2017/00065**

**10CFR50.54(q)(3) Evaluation for GGNS Emergency Plan, Revision 75**

Procedure/Document Number: Emergency Plan	Revision:75
Equipment/Facility/Other: Grand Gulf Nuclear Station	
Title: Grand Gulf Nuclear Station Emergency Plan	

**Part I. Description of Proposed Change:**

Change: Revise the GGNS Emergency Plan to reword section 8.3.2.d., Medical Emergency Drill, Page 8-7 and clarify that the onsite portion of the drill may be separate from the offsite portion of the drill. This is in response to CR-GGN-2017-0311.

**Change From:**

" A drill involving the First Aid Team and local support hospitals is conducted on an annual basis and includes simulated radiological emergencies."

**To:**

"A medical emergency drill, involving a simulated contaminated individual, which contains provisions for participation by local support service agencies (i.e., ambulance and offsite medical treatment facility), shall be conducted annually. The offsite portion of the medical drill may be performed separately, or as part of an exercise or other scheduled drill."

**Part II. Description and Review of Licensing Basis Affected by the Proposed Change:**

Performed electronic search of the GGNS Emergency Plan section 8.3.2 Drill and Exercise Schedule, 7.8 First Aid and Medical Facilities, 6.7.3 Medical Transportation, 6.7.4 Medical Treatment, 5.6 Local Services Support, 5.6.1 Medical Support, Appendix "D" Letters of Agreement (River Region Health System, Claiborne County Hospital, and Metro Ambulance Service.

Revision 1 of the Emergency Plan was reviewed for the original approved text used to describe the Medical Emergency Drill. The description of section 8.3.2 d. states: " A drill involving the First Aid Team and local support hospitals will be conducted on an annual basis and shall include simulated radiological emergencies." The text was revised in Revision 18 to: " A drill involving the First Aid Team and local support hospitals is conducted on an annual basis and includes simulated radiological emergencies."

Revision 18 removed the words "will be" and "shall" and replaced them with the verbs "is" and "includes", respectively. The commitment was not changed with the use of the new verbs. Section 8.3.2.d of the GGNS Emergency Plan revision 18 has not been changed until this revision (75). Revision 1 of the Plan approved by the NRC, established the licensing basis for the GGNS Emergency Plan. It, along with the changes in revision 18, and the changes in revision 75 were considered in their entirety.

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**Part III. Describe How the Proposed Change Complies with Relevant Emergency Preparedness Regulation(s) and Previous Commitment(s) Made to the NRC:**

10 CFR 50.47 (b)(14) Periodic exercises are (will be) conducted to evaluate major portions of the emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

Site Compliance: Through implementation of this revision, the commitment to comply with the planning standards provided in 10 CFR 50.47 (b)(14) remains, and the requirement for an annual medical emergency drill involving a simulated contaminated individual and local support services remains in the GGNS Emergency Plan. Even though the hospital and ambulance portion of the drill or exercise may be held at different times, both the ambulance staff and the hospital staff will be able to develop and maintain key skills in a manner similar to drills and exercises held sequentially. Deficiencies during these drills and exercises will continue to be identified and corrected.

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**Part IV. Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change:**

**10 CFR 50.47(b)(14) - Drill and Exercise Program**

- A drill and exercise program (including radiological, medical, health physics, and other program areas) is established.
- Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills, are assessed via a formal critique process in order to identify weaknesses.
- Identified weaknesses are corrected.

Sections IV.F.1–2 of Appendix E to 10 CFR 50 provides supporting requirements. Informing criteria appear in Section II.N of NUREG-0654 and the licensee's emergency plan.

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**Part V. Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions:**

The change clarifies the text in section 8.3.2.d and is more consistent with the wording used by the rest of the Entergy Fleet. The second sentence in section 8.3.2.b further clarifies that the onsite and offsite portion of the drill may be separated. This is implied in the NUREG 0654 wording by referring to the offsite portion of the drill as being allowed to be performed as part of the required annual exercise.

Additionally, the offsite portion of the drill is composed of two sub-portions: The ambulance sub-portion involves ambulance and potentially site personnel. The hospital sub-portion involves hospital and potentially site personnel. These sub-portions can be drilled separately with drill objectives being exercised independently with very little or no additional simulation. Evolutions will continue to be performed that provide performance opportunities to develop, maintain, and demonstrate key skills. The evolutions will continue to be assessed in a formal critique, with weaknesses identified and corrected.

Aside from the clarification about the onsite and offsite portion of the medical drill, the drill requirements remain the same. The drill will continue to challenge ERO personnel and they continue to be provided adequate opportunities to practice the use of procedures and equipment associated with the drill. The periodicity of the drill (annually) and the elements performed during the drill (first aid, contamination control, communication, surveys, dosimetry), and the offsite support services and facilities (ambulance, hospital) are not affected as a result of the change.

Communication between the site and ambulance will not change during a separated drill. For the offsite portion of the drill, the site will still need to contact the ambulance service and provide the information required by procedure. Upon arrival at the site, controllers will provide the ambulance staff with patient medical and radiological conditions. Conversely, for the onsite portion of the drill, site responders are expected to provide medical and radiological conditions to controllers.

Additionally, communications between the site and the hospital will not change during a separated drill. For the offsite portion of the drill, the site will still contact the hospital and provide the information required by procedure. Communication between the ambulance service and the hospital will be no different during a separated drill or a sequential drill. Both parties will be participating.

Since the onsite and offsite portion of the drill are allowed to be separated with no adverse impact, and the drill objectives remain unchanged for the site, hospital, and ambulance service, the clarification to section 8.3.2.b is not considered a reduction in effectiveness.

The proposed changes to the GGNS emergency plan continue to meet the planning standards outlined in 10 CFR 50.47(b)(14). The effectiveness of the emergency plan is not reduced. The emergency plan changes can be incorporated without prior NRC approval.

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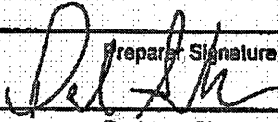
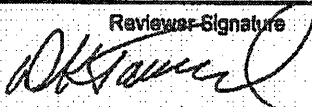
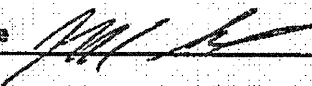
**Part VI. Evaluation Conclusion**

Answer the following questions about the proposed change.

1. Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
2. Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
3. Does the proposed change constitute an emergency action level schema change?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If questions 1 or 2 are answered NO, or question 3 answered YES, reject the proposed change, modify the proposed change and perform a new evaluation or obtain prior NRC approval under provisions of 10 CFR 50.90. If questions 1 and 2 are answered YES, and question 3 answered NO, implement applicable change process(es). Refer to step 5.8[8].

**Part VII. Signatures**

Preparer Name (Print) Paul Sudnak	Preparer Signature 	Date: 8/31/17
(Optional) Reviewer Name (Print)	Reviewer Signature	Date:
Reviewer Name (Print) David Townsend Nuclear EP Project Manager	Reviewer Signature 	Date: 8/31/17
Approver Name (Print) Jeffery Selter Manager, Emergency Preparedness or designee	Approver Signature 	Date: 8/31/17