

NRR-DMPSPEm Resource

From: Wall, Scott
Sent: Thursday, March 22, 2018 10:44 AM
To: HAZELHOFF, AMY C; MIKSA, JAMES P; ERICKSON, JEFFREY S
Cc: Rankin, Jennivine; Norris, Michael; Kinard, Richard
Subject: Palisades - Final RAI Concerning Site Emergency Plan Changes (CAC MG0198; EPID L-2017-LLA-0305)
Attachments: LTR - Final RAIs - EP Changes.pdf

Amy,

Attached are requests for additional information (RAIs) concerning the August 31, 2017 (ADAMS Accession No. ML17248A389, Entergy Nuclear Operations, Inc. (ENO, the licensee) submittal regarding changes to the Palisades Nuclear Plant (Palisades) Emergency Response Organization (ERO) on-shift and augmented staffing, based on the certifications for permanent cessation of power operations and permanent removal of fuel from the reactor vessel to the NRC in accordance with §50.82(a)(1)(i) and (ii) to Title 10 of the Code of Federal Regulations (10 CFR).

As discussed by phone on March 22, 2018, ENO has agreed to a 30 day response to these RAIs.

Regards,

Scott P. Wall, LSS BB, BSP

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

CHANGINGS TO SITE EMERGENCY PLAN

ENTERGY NUCLEAR OPERATIONS, INC

PALISADES NUCLEAR PLANT

DOCKET NO. 50-255

By letter dated August 31, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17248A389), Entergy Nuclear Operations, Inc. (ENO, the licensee), requested prior U.S. Nuclear Regulatory Commission (NRC) approval of an amendment to the Palisades Nuclear Plant (PNP) site emergency plan (SEP) in support of ENO's intent to permanently cease power operations at PNP no later than May 31, 2022. The proposed amendment to the PNP SEP would revise the PNP Emergency Response Organization (ERO) on-shift and augmented staffing, based on the certifications for permanent cessation of power operations and permanent removal of fuel from the reactor vessel to the NRC in accordance with §50.82(a)(1)(i) and (ii) to Title 10 of the *Code of Federal Regulations* (10 CFR).

The NRC staff has reviewed the application and determined that additional information is needed for the staff to complete its review.

RAI-PNP-1

Minimum staffing is explicitly addressed in the following sections of Attachment 1, "Description and Evaluation of the Proposed Changes," to ENO's August 31, 2017, letter: Section 3.2.2.1, "Technical Support Center" (page 24 of 35); Section 3.2.2.2, "Operations Support Center" (page 26 of 35), and Section 3.2.2.3, "Emergency Operations Facility" (page 27 of 35). In the letter, only minimum staffing positions at the Technical Support Center (TSC) are proposed to be eliminated, with no minimum staff proposed for elimination at the Operations Support Center (OSC) or Emergency Operations Facility (EOF). Section 3.2.2.4, "Joint Information Center" (page 29 of 35) is silent on the proposed outcome of minimum staff positions. However, in reviewing pages 7 – 8 of Attachment 6, "Emergency Response Organization Task Analysis," to ENO's August 31, 2017, letter all Joint Information Center (JIC) positions, whether to be retained or eliminated, are shown as being minimum staff. Please provide additional clarification regarding the intended minimum staffing positions at the JIC.

RAI-PNP-2

Section 3.2.2.1, "Technical Support Center," (page 24 of 35) of Attachment 1 to the August 31, 2017 letter, ENO states, in part:

TSC Engineers (Electrical, I&C, and Mechanical) – The primary duties of the TSC Engineer positions include responding to engineering requests from the Engineering Coordinator, evaluating the implementation of Severe Accident Management Guidelines, and assisting the OSC in preparing to send repair teams into the plant. These duties are either no longer necessary in a permanently shut down and defueled condition or will be performed by the Engineering Coordinator. The Engineering Coordinator is tasked with

performing an engineering assessment of plant conditions and/or actions needed to mitigate damage to the plant.

With respect to responding to engineering requests from the Engineering Coordinator, this function will ***continue to be performed by augmenting qualified engineering resources***. The Engineering Coordinator will continuously evaluate the need for engineering resources and coordinate with the EOF Technical Advisor to call in qualified engineering personnel.

In addition to the change in status of the plant, the basis for the elimination of the TSC Engineers (Electrical, I&C, and Mechanical) should be that that Engineering Coordinator would be able to provide the needed initial engineering support in the TSC. Please clarify if the TSC Engineering Coordinator is qualified to perform “an engineering assessment of plant conditions and/or actions needed to mitigate damage to the plant,” specifically in response to a fuel handling accident or an event resulting in damage to the spent fuel pool (SFP) integrity or the loss of SFP cooling or inventory.