

From: Wall, Scott
Sent: Monday, April 19, 2021 3:28 PM
To: Lashley, Phil H (EH)
Cc: Morgan, Jeffrey D.
Subject: Final RAI - Perry - Request to Review the Emergency Plan (EPID No. L-2020-LLA-0282)

Dear Mr. Lashley,

By Letter dated December 28, 2020 (Agencywide Documents Access management System (ADAMS) Accession No. ML20365A028), Energy Harbor Nuclear Corp (EHNC, the licensee) submitted a license amendment request (LAR) to Operating License NPF-58 for Perry Nuclear Power Plant, Unit No. 1 (PNPP). The LAR revises PNPP emergency plan to eliminate on-shift staffing positions, increase emergency response facility (ERF) augmentation times, revise ERF staffing positions, revise facility position titles to be consistent with the EHNC fleet, and eliminate information from the emergency plan contained in implementing procedures and instructions.

The NRC staff has reviewed the submittals and determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). During a telephone calls on April 19, 2021, the EHNC staff indicated that a response to the RAIs would be provided by May 21, 2021.

If you have questions, please contact me at 301-415-2855 or via e-mail at Scott.Wall@nrc.gov.

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Docket No. 50-440

Enclosure:
Request for Additional Information

cc: Listserv

RAI-NSIR

REQUEST FOR ADDITIONAL INFORMATION

EMERGENCY RESPONSE FACILITY AUGMENTATION TIMES

ENERGY HARBOR NUCLEAR CORP

PERRY NUCLEAR POWER PLANT, UNIT NO. 1

NRC DOCKET No. 50-440

INTRODUCTION

By letter dated December 28, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20365A028), Energy Harbor Nuclear Corp (the licensee) submitted a license amendment request (LAR) for Perry Nuclear Power Plant (PNPP). The LAR revises PNPP emergency plan to eliminate on-shift staffing positions, increase emergency response facility (ERF) augmentation times, revise ERF staffing positions, revise facility position titles to be consistent with the Energy Harbor Nuclear Corp fleet, and eliminate information from the emergency plan contained in implementing procedures and instructions.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the application and has determined that the following additional information is required in order to complete the review.

APPLICABLE REGULATION AND GUIDANCE

The NRC staff has reviewed the license amendment request, using the guidance contained in NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support Nuclear Power Plants," Revision 1 and the NRC revised guidance in the letter to the Nuclear Energy Institute, "Alternative Guidance for Licensee Emergency Response" dated June 18, 2018 (ADAMS Accession No. ML18022A352). The proposed changes to the PNPP Emergency Plan are based on the NRC Revised Table B-1, "Emergency Response Organization (ERO) Staffing and Augmentation Plan," provided in the June 2018 letter.

RAI-NSIR-01

Requirement:

- Title 10, "Energy," of the *Code of Federal Regulations* (10 CFR), Section 50.47(b)(1) requires that each principal response organization has staff to respond and to augment its initial response on a continuous basis.
- 10 CFR 50.47(b)(2) requires that the on-shift facility licensee has adequate staffing to provide initial facility accident response in key functional areas is maintained at all times and timely augmentation of response capabilities is available.
- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion B.1.a states that the site-specific ERO is developed.

Issue: Section 3.2.2, "Emergency Direction and Control Major Functional Area," of the LAR states:

The proposed revision to the PNPP Emergency Plan defines "facility activation" as the availability of minimum staff responders to perform response actions in each facility.

However, the guidance in the NRC Revised Table B-1 provides,

The minimum ERO staffing plan is that which is required to effectively implement the site-specific emergency plan (i.e., the emergency plan cannot be effectively implemented without this staff).

- As proposed, it does not appear to the staff that the minimum staffing as described will allow the facilities to perform their intended functions (e.g., the minimum activation staffing for the Operations Support Center is one person, the OSC Coordinator). Please provide justification that the minimum facility staffing of each facility can implement the PNPP Emergency Plan until fully staffed.

RAI-NSIR-02

Requirement:

- 10 CFR 50.47(b)(1) requires that each principal response organization has staff to respond and to augment its initial response on a continuous basis.
- 10 CFR 50.47(b)(14) requires that periodic exercises are (will be) conducted to evaluate major portions of 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.

Issue: Section 8.8, "Drills and Exercises," of the proposed PNPP Emergency Plan states, in part:

Periodic drills and exercises will be conducted to evaluate the status of emergency preparedness and to satisfy the requirements outlined in Section 8.8.4, "Frequency of Drills and Exercises." The prime objective is to verify the preparedness of all participating personnel, organizations, and agencies.

- Describe how Energy Harbor Nuclear Corp plans to specifically evaluate the adequacy of the minimum staffing levels to perform required functions until full augmentation, with the proposed ERO staffing changes, to ensure continued effective implementation of the proposed PNPP Emergency Plan.

RAI-NSIR-03

Requirement:

- 10 CFR 50.47(b)(1) requires that each principal response organization has staff to respond and to augment its initial response on a continuous basis.
- 10 CFR 50.47(b)(2) requires that the on-shift facility licensee has adequate staffing to provide initial facility accident response in key functional areas is maintained at all times and timely augmentation of response capabilities is available.
- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion B.1.a states that the site-specific ERO is developed.

Issue: Section 3.2.5, "Plant System Engineering, Repair and Corrective Actions Major Functional Area," of the LAR states, in part:

Performance of activities associated with maintenance activities will be eliminated on-shift and response times will be extended for augmented resources from 30 to 60 minutes for the mechanical maintenance coordinator (OSC), electrical maintenance coordinator (OSC), and OSC coordinator (OSC). The augmented resource response

times will be extended from 60 to 90 minutes for the I & C Coordinator (OSC), I&C personnel (OSC), mechanical personnel (OSC), electrical personnel (OSC).

Further, Section 5.2.2.2, "Operations Support Center (OSC) of the proposed PNPP Emergency Plan states, in part:

Mechanical Maintenance (MM) Coordinator Supervisor, - responsible for troubleshooting performance of initial **electrical maintenance** corrective actions work in the plant.

- Describe how the functions related to repair and corrective actions will be adequately performed by the mechanical maintenance coordinator (OSC), electrical maintenance coordinator (OSC), and OSC coordinator (OSC) until relieved. Are these positions filled by personnel who maintain the same qualifications, training and proficiency as the mechanical personnel (OSC) and electrical personnel (OSC)? Additionally, please clarify and/or correct the above statement concerning the role of the Mechanical Maintenance Coordinator Supervisor.

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