

POLICY ISSUE NOTATION VOTE

July 13, 2012

SECY-12-0097

FOR: The Commissioners

FROM: R. W. Borchardt
Executive Director for Operations

SUBJECT: ENTERGY OPERATIONS, INC.'S REQUEST TO RELOCATE THE
RIVER BEND STATION BACKUP EMERGENCY OPERATIONS
FACILITY

PURPOSE:

The purpose of this paper is to obtain Commission approval of the proposal by Entergy Operations, Inc. (Entergy), to relocate the existing backup emergency operations facility (BEOF) for the River Bend Station (RBS) to a facility beyond 25 miles from RBS. This paper does not address any new commitments or resource implications.

SUMMARY:

In a letter dated September 12, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11259A008), and as supplemented by letters dated October 13, 2011, and March 22, 2012 (ADAMS Accession Nos. ML11297A029 and ML12087A379, respectively), Entergy proposed to relocate the BEOF for RBS from its current location at the Entergy Operations–Baton Rouge Division Office, located at 1509 Government Street in Baton Rouge, Louisiana, approximately 23 miles southeast of RBS, to Entergy's Customer Service Center, located at 5564 Essen Lane in Baton Rouge, Louisiana, approximately 28 miles southeast of RBS.

CONTACT: Michael B. Norris, NSIR/DPR
301-415-4098

The staff has concluded that the greater distance involved in the proposed plan should not impede the licensee's and the U.S. Nuclear Regulatory Commission's (NRC's) ability to perform their respective functions. The staff believes that a marginal increase in BEOF staffing time will be more than offset by improved conditions and capabilities of the new facility. The staff is confident that this proposal will continue to provide reasonable assurance that adequate protective measures can and will be implemented in the event of a radiological emergency.

BACKGROUND:

Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix E, Section IV.E.8.b. specifies the requirements for emergency facilities and equipment. A licensee may locate a primary facility less than 10 miles from the nuclear power reactor site(s), but in such cases, must have a backup facility located between 10 miles and 25 miles of the nuclear power reactor site(s). A licensee desiring to locate an emergency operations facility more than 25 miles from a nuclear power reactor site(s) must request prior Commission approval. This requirement for prior Commission approval does not differentiate between a primary and backup facility. The staff will issue a license amendment for the proposal upon Commission approval.

SECY-96-170, "Assessment of Exceptions Granted for Locations and Staffing Times of Emergency Operations Facilities," dated August 5, 1996, provided a summary of exceptions to the guidance provided in NUREG-0696, "Functional Criteria for Emergency Response Facilities," dated February 1981, for the locations of Emergency Operations Facilities (EOFs) and BEOFs to the Commission. The summary identified 19 BEOFs located greater than the original 20-mile distance with 9 located greater than 25 miles. RBS's location for the current BEOF was provided to the Commission for approval in SECY-83-152, "Backup Emergency Operations Facility for the Clinton Power Station, Unit 1 and River Bend Station Units 1 and 2," dated April 28, 1983. At that time, Commission approval was required for BEOFs more than 20 miles from the Technical Support Center (TSC). Approval for the location of the RBS BEOF was provided by letter dated June 1, 1983 (ADAMS Accession No. 8306150221).

The current NRC-approved BEOF at the Entergy Operations office in Baton Rouge is approximately 23 miles from the TSC. Entergy is discontinuing the use of this facility and property. The distance from the RBS to the proposed BEOF location at the Entergy Customer Service Center in Baton Rouge is 28 miles. NRC staff conducted a walkthrough of the current BEOF location and the proposed BEOF location with licensee personnel on February 14, 2012.

DISCUSSION:

NUREG-0696 specifies that a BEOF need not be a separate, dedicated facility, but when activated, shall provide continuity of dose prediction and decision-making functions by arranging for portable backup equipment, and that no special provisions for protection factors or ventilation protection are needed.

The staff considered the following factors in conducting the evaluation of Entergy's proposal to relocate the RBS BEOF.

Functions

The proposed facility will have the capabilities to: (1) obtain and display plant data and radiological information; (2) assess plant and radiological release conditions; (3) perform offsite dose projections; (4) make public protective action recommendations, and (5) perform offsite notifications to State and local agencies. The proposed RBS BEOF also has a backup generator capable of supplying all of the electrical loads within the facility to provide for the continued capability to perform BEOF functions. The proposal meets the functional guidance for continuity of dose prediction and decision-making functions for a BEOF as provided in NUREG-0696.

Location

The licensee's proposal results in a BEOF that is 28 miles from the RBS, which is 5 miles further from the plant than the current BEOF. In response to a request for additional information (RAI), in its letter dated March 22, 2012, the licensee provided an analysis, which indicated that the relocation will add approximately 8–10 minutes of travel time for emergency response organization (ERO) members responding from the onsite EOF. For events which require ERO members to report directly to the BEOF, the licensee determined that travel time is about the same. Based on this analysis, the licensee indicated that the proposed BEOF can become operational within the 90-minute goal set for the onsite EOF and, therefore, the relocation of the BEOF would not adversely affect timeliness in staffing the facility.

In a second RAI, the staff inquired whether the licensee had evaluated other facilities located within 25 miles of RBS as a possible site for the proposed BEOF. In a letter dated March 22, 2012, the licensee indicated that four other Entergy facilities closer to RBS were reviewed for potential use as the BEOF. The licensee's review determined that none of the four other Entergy facilities possessed the necessary space and supporting infrastructure (tele-communications, data acquisition, computer access) that are found at the proposed BEOF. In addition, the licensee's review identified potential concerns with cyber security, physical security, and available parking at the other Entergy facilities. Since the proposed location serves as a primary Entergy IT hub, with redundant computer capabilities, along with being a continuously occupied, physically secured facility, the proposed location does not pose the concerns present at the other locations evaluated.

Size

The proposed RBS BEOF has 1,650 square feet in three rooms of reserved space on the second floor, not including a break room, hallway, and restrooms. Additional space is available on the first floor if needed in an emergency. The three rooms are designated as the main conference room, dose assessment room and the NRC room. The current RBS BEOF has 1,410 square feet of space in an auditorium containing lockers with communications equipment and computers, as well as 500 square feet in an adjacent room designated for the NRC for a total of 1,910 square feet of designated space. The licensee indicated that there should be 29 responders to the RBS EOF: 13 from RBS, 6 from the Louisiana Department of Environmental Quality (LDEQ), 9 from the NRC (per NUREG-0696), and 1 from the Federal Emergency Management Agency (FEMA). LDEQ is the only State or local agency that sends responders to the RBS EOF. Although the proposed RBS BEOF is smaller in size than the current BEOF, the staff believes that the improved quality (additional IT equipment, modern restrooms, overall

facility conditions, location in an occupied rather than an abandoned building, and compliance with access requirements of the Americans with Disabilities Act) of the proposed facility is a more important factor in the staff's conclusion than the loss of the 260 square feet of floor space.

Communications

The proposed RBS BEOF is also currently utilized as Entergy's Electrical Outage Call Center and, as such, has sufficient internal and external telecommunications, including Internet access, to support BEOF functions. The proposed location, like the existing one, provides for reliable voice and data communication to the TSC and control room, as well as reliable voice communications to the Operations Support Center and to the NRC, State, and local emergency operations centers. Additionally, the licensee has installed a public address system in the dose assessment and NRC rooms to allow for facility briefings.

State and Local Agreement

The licensee has discussed the proposed relocation of the BEOF with State and local agencies, as well as FEMA Region VI. The licensee's letter dated October 13, 2011, provides letters from the following agencies documenting that the respective agency has no issues or concerns with the proposed BEOF relocation in calendar year 2012 to the Entergy Customer Service Center, located at 5564 Essen Lane in Baton Rouge:

- Louisiana Governor's Office of Homeland Security and Emergency Preparedness
- Louisiana Department of Environmental Quality
- Mississippi State Department of Health
- West Feliciana Parish Homeland Security and Emergency Preparedness
- Pointe Coupee Parish Homeland Security and Emergency Preparedness
- East Baton Rouge Parish Homeland Security and Emergency Preparedness
- West Baton Rouge Parish Homeland Security and Emergency Preparedness
- Federal Emergency Management Agency, Region VI

CONCLUSION:

The NRC staff has reviewed the proposed RBS BEOF relocation as outlined in Entergy's letter dated September 12, 2011, and supplemented by responses contained in letters dated October 13, 2011, and March 22, 2012. Based on the staff's review of these documents, and the staff's walkthrough of the current and proposed BEOF location, the staff finds that the proposed facility meets the functional guidelines for a BEOF contained in NUREG-0696 and continues to meet or exceed the capabilities of the current BEOF facility. The staff believes that the additional five-mile distance from the RBS TSC will have minimal impact on the timely staffing of the proposed BEOF. In addition, the proposed BEOF's location in Entergy's Customer Service Center in Baton Rouge, which also serves as Entergy's Electrical Outage Call Center manned on a continuous basis, will ensure the continued operability and availability of the facility to serve as a BEOF. The NRC staff has determined that emergency response, communication and coordination are not adversely affected by the relocation of the RBS BEOF to the Entergy Customer Service Center in Baton Rouge, and that the proposed BEOF would continue to protect the public health and safety, and promote the common defense and security.

RECOMMENDATIONS:

The NRC staff recommends that the Commission approve the proposal to relocate the RBS BEOF to Entergy's Customer Service Center in Baton Rouge, Louisiana.

RESOURCES:

No additional resources are required in support of this activity.

COORDINATION:

The Office of the General Counsel has reviewed this Commission paper and has no legal objection to its content. The paper was coordinated with the Office of the Chief Financial Officer for resource implications.

/RA by Michael R. Johnson for/

R. W. Borchardt
Executive Director
for Operations