

**From:** Wang, Alan  
**Sent:** Wednesday, February 22, 2012 3:14 PM  
**To:** 'BURMEISTER, BARRY M'; Joseph Clark (JCLARK@entergy.com);  
HUFFSTATLER, KRISTI Y  
**Cc:** Lent, Susan; Burkhardt, Janet  
**Subject:** River Bend Station Request for Additional Information Regarding Proposed  
Emergency Action Levels Using Nuclear Energy Institute (NEI) 99-01 Rev. 5  
(ME6846)

Joey and Barry,

By letter dated August 1, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11216A055), Entergy Operations, Inc (Entergy, the licensee) submitted Entergy Letter RBG-47165, "Proposed Emergency Action Levels [EAL] Using NEI 99-01 Revision 5 Scheme." Entergy's letter stated that the current River Bend Station, Unit No. 1 (RBS) EAL scheme is based on generic development guidance from Nuclear Energy Institute (NEI) 99-01, Revision 4, "Methodology for Development of Emergency Action Levels," dated January 2003 (ADAMS Accession No. ML030230250). Since 1992, numerous enhancements and clarification efforts have been made to the generic EAL development guidance resulting in the most latest document, NEI 99-01, Revision 5, "Methodology for Development of Emergency Action Levels," (ADAMS Accession No. ML080450149), which was found to be acceptable for use as generic EAL development guidance by the Nuclear Regulatory Commission (NRC) staff by letter dated February 22, 2008 (ADAMS Accession No. ML080430535).

The proposed EAL scheme was developed using the generic development guidance from NEI 99-01, Revision 5 with differences and deviations based upon design criteria applicable to the site. The proposed EAL scheme also incorporates licensee preferences for terminology, format, and other licensee desired modifications to the generic EAL scheme provided in NEI 99-01 Revision 5.

The NRC staff has determined that the following additional information is needed to complete our review of this request. This request for additional information (RAI) was discussed with Mr. Dean Burnett, Manager-Emergency Planning, on February 22, 2012, and it was agreed that a response would be provided within 30 days from the issuance of this email. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1445 or via e-mail at [Alan.Wang@nrc.gov](mailto:Alan.Wang@nrc.gov).

The following RAIs are related to your request in letter dated August 1, 2011:

1. Introduction – A review of an EAL scheme, submitted in accordance with Appendix E to 10 CFR 50, requires the submission of a complete EAL technical bases document that includes, among other things, documentation as to how a licensee will address EAL upgrades, downgrades, transient events, and simultaneous events. While a licensee has some latitude to design an implementation method that is acceptable to the site (using the guidance provided in Section 5.3 to NEI 99-01 Revision 5, it is expected that this information be incorporated into a single document (EAL Technical Bases) to: (1) ensure an acceptable change management process going forward; (2) aid in the consistency of site-specific training, and (3) support the regulatory review process. Please incorporate the guidance from Sections 3.8 through 3.13 of NEI 99-01 Revision 5. While the verbatim

compliance is not required, the intent of each section should be addressed in the licensee EAL technical bases document.

2. The definition of the terms CONFINEMENT BOUNDARY, CONTAINMENT CLOSURE, and VITAL AREA reflect wording from the generic EAL development guidance, rather than defined as used by RBS. Please provide further justification for use of generic definitions or revised accordingly to reflect RBS-specific use.
3. The term "Site Boundary" is capitalized as if it were a defined term. "Site Boundary" is not defined in the "definitions" section. Please justify or revise accordingly.
4. AU1, AA1, AS1, and AG1: Please provide justification that the values of Table R1 for Notification of Unusual Event (NOUE), Alert, Site Area Emergency (SAE), and General Emergency (GE) are within the range of the listed instrumentation.
5. CU5: Correct typo in the numbering of the EAL or justify difference.
6. CA1.1 and CS1.1: Clarify whether the values provided accurate relative to the RBS Level 2 set point?
7. CA3.2: In the "Basis" section, the values "10 psi" and "10 psig" appear to be used interchangeably. Please justify this apparent inconsistency or revise accordingly.
8. Fission Product Barrier Table: For PC4, should this EAL be listed as a Potential Loss vice a Loss? Please explain this deviation from endorsed guidance or revise accordingly.
9. RC3: The loss threshold criterion of Main Steam Tunnel temperature > 144°F [173°F NRC TS submittal change] is also applicable to the potential loss threshold and could cause confusion between the two. Please provide justification for its inclusion in the loss threshold or revise accordingly.
10. RC4: The "Bases" section is missing the second paragraph from the associated portions of NEI 99-01, Revision 5. Please revise accordingly or justify this omission.
11. PC2: PC2 appears to have been mislabeled as PC1 (page 69 of Attachment 3). Please revise accordingly or justify this difference.

12. HU6.1 and HA6.1: Please provide a copy of the "Alarm Response Procedure" referenced in HU6.1 "Basis" section to support staff's technical review.
  
13. HA5.1: Please confirm that the areas as listed in Table H-1 are required to be entered for safe operation or safe shutdown/cooldown. Per endorsed guidance, table should only list areas where access is required to operate said equipment.
  
14. HA6.3: The bases for this EAL discuss areas identified in Table 4 of Emergency Operating Procedure (EOP) 3 as containing systems of concern. Please justify why this information should not be included in this EAL or revise accordingly.
  
15. SU9.1: Please explain whether values listed (i.e., 17.875 and 32.83) can be accurately read on applicable instrumentation. Additionally, identify where this indication is located and whether this information be obtained in a timely manner for event classification determination.

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