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July 8, 2019
L-19-166

10 CFR 50.90

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

SUBJECT:
Davis-Besse Nuclear Power Station, Unit No. 1
Docket No. 50-346, License No. NPF-3
Response to Request for Additional Information and Supplemental Information
Regarding License Amendment Request for Proposed Post-Shutdown Emergency
Plan (EPID L-2019-LLA-0011)

By application dated February 5, 2019 (Accession No. ML19036A524), as supplemented by letter dated April 10, 2019 (Accession No. ML19100A000), FirstEnergy Nuclear Operating Company (FENOC) submitted a license amendment request for Davis-Besse Nuclear Power Station, Unit No. 1 (Davis-Besse). The proposed amendment would revise the Davis-Besse emergency plan for the post-shutdown and permanently defueled condition.

On June 13, 2019, the Nuclear Regulatory Commission (NRC) staff requested additional information to complete its review. The FENOC response is contained in Attachment 1. As a result of the FENOC response, Attachment 2 contains updates to the Proposed Post-Shutdown Emergency Plan.

There are no regulatory commitments included in this submittal. If there are any questions, or if additional information is required, please contact Mr. Thomas Lentz, Manager, FENOC Nuclear Licensing and Regulatory Affairs, at (330) 315-6810.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 8, 2019.

Sincerely,



Mark B. Bezilla

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Attachments:

1. Response to Request for Additional Information
2. Updated Proposed Post-Shutdown Emergency Plan

cc: NRC Regional Administrator - Region III
NRC Resident Inspector
NRC Project Manager
Executive Director, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Utility Radiological Safety Board

Response to Request for Additional Information
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The NRC staff's request for additional information is provided in bold text followed by the FENOC response.

Request for Additional Information (RAI) 1

The Technical Support Center (TSC) Engineering Manager is the only minimum staffing position required for TSC activation which will be retained with this proposed change. Section 5.4.1.b. "Technical Support Center (TSC)," of the proposed post-shutdown emergency plan (PSEP) states, in part:

TSC staff will assess facility conditions, and provide management and technical assistance to the Control Room, as required, to mitigate the effects of the emergency event. The TSC staff will analyze and track parameters relating to the technical [emergency action levels] EALs, and will advise the Emergency Director of the need to reclassify the emergency.

Section 7.2.1, "Technical Support Center (TSC)," of the proposed PSEP states: "The TSC serves as the workplace for key [emergency response organization] personnel who, during emergencies, assist the Control Room staff, perform accident assessment, and determine appropriate protective actions."

Explain how the TSC Engineering Manager can provide management and technical support to the control room personnel during emergency conditions without support from other TSC personnel.

Response

As shown on Tables 2.4-1 and 4.5-2 of the Post-Shutdown Emergency Plan (PSEP) License Amendment Request (LAR), in addition to the TSC Engineering Manager, other augmented positions will respond to the TSC following an emergency declaration. When the TSC is staffed with the TSC Engineering Manager, the Emergency Plant Manager, the Emergency Assistant Plant Manager (who may report either to the control room or the TSC), and the Emergency RP Manager, the capability exists to assess facility conditions, provide management and technical support to the control room, and mitigate the effects of the emergency.

Table 5-1.B of the Proposed Post-Shutdown Emergency Plan, which was included in the LAR, identified the TSC Engineering Manager and the Emergency Assistant Plant Manager as positions that respond upon declaration of an Alert or higher emergency classification. To ensure the TSC minimum staff can provide management and

technical support, the Proposed Post-Shutdown Emergency Plan is revised, as provided in Attachment 2, to add the Emergency Plant Manager and the Emergency RP Manager as minimum staff required for TSC activation with the facility in the permanently shutdown and defueled condition.

RAI 2

Currently, Table 5-1.B of the emergency plan lists the NRC Liaison as required minimum staff for an alert or higher emergency classification. LAR Section 4.5.2.3, "Emergency Operations Facility Augmenting Positions," states, in part:

The proposed staffing changes includes the elimination of the NRC Liaison position. The primary duty of the NRC Liaison is to establish and maintain communication with the NRC. The Technical Liaison – EOF [Emergency Operations Facility] Communicator, located in the EOF, is assigned these duties in the post-shutdown emergency plan.

However, the Technical Liaison – EOF Communicator is not listed as minimum staff in the proposed revision to Table 5-1.B.

Explain why the Technical Liaison – EOF Communicator does not need to be a required minimum staff position given that this position will assume the duties of the NRC Liaison. Explain why the current basis for including the NRC Liaison as a minimum staff position is not valid for the permanently shutdown condition.

Response

Table 5-1.B of the Proposed Post-Shutdown Emergency Plan is revised, as provided in Attachment 2, to identify the Technical Liaison – EOF Communicator as minimum staff required for EOF activation with the facility in the permanently shutdown and defueled condition. Since the Technical Liaison – EOF Communicator is assuming the tasks of the NRC Liaison position and will be a minimum staffing position, the basis of the NRC Liaison being a minimum staffing will apply to the Technical Liaison – EOF Communicator.

Attachment 2
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Updated Proposed Post-Shutdown Emergency Plan
(Four pages follow)

Updated Mark-up Page of the Proposed Post-Shutdown Emergency Plan
(One page follows)

TABLE 5-1

MANPOWER, LOCATION, AND RESPONSE CONSIDERATIONS FOR EMERGENCIES
Page 2 of 2

B. AUGMENTED EMERGENCY RESPONSE STAFFING REQUIREMENTS

UNUSUAL EVENT		ALERT, SITE AREA EMERGENCY, GENERAL EMERGENCY	
PERSONNEL	TIME	PERSONNEL	TIME
<u>CONTROL ROOM</u> Emergency Assistant Plant Manager (1) ³	Alerted	<u>CONTROL ROOM</u> Emergency Assistant Plant Manager (1) ³	Normal Hours: 30 minutes Off Hours: 60 minutes
<u>OPERATIONS SUPPORT CENTER</u> OSC Manager (1) OSC RP Coordinator (1)	Alerted	<u>OPERATIONS SUPPORT CENTER</u> OSC Manager (1) OSC RP Coordinator (1) Mechanical Maintenance (21) Instrument & controls (2) Electrical Maintenance (21) RP Technician (1) (2) Chemistry Technician (0) (4) RP Technician (21) (52) Chemistry Technician (4) (2)	Normal Hours: 30 minutes - Off Hours: 60 minutes 1-2 hours
<u>TECHNICAL SUPPORT CENTER</u> TSC Engineering Manager (1)	Alerted	<u>TECHNICAL SUPPORT CENTER</u> TSC Engineering Manager (1) Core/Thermal Hydraulic Engineer (4) <u>Emergency Plant Manager (1)</u> <u>Emergency RP Manager (1)</u> TSC I&C Engineer (4) TSC Electrical Engineer (4) TSC Mechanical Engineer (4) <u>Call in as necessary</u>	As Required: Normal Hours: 30 minutes Off Hours: 60 minutes 1-2 hours
<u>EMERGENCY OPERATIONS FACILITY</u> Emergency Director (1) Emergency Offsite Manager (1)	Alerted	<u>EMERGENCY OPERATIONS FACILITY</u> Emergency Offsite Manager (1) Dose Assessment Coordinator (1) Emergency Planning Advisor (1) RMTs (3) Emergency Director (1) NRC Liaison <u>Technical Liaison – EOF Communicator (1)</u> State/County Communicator (1)	As Required: Normal Hours: 60 minutes Off Hours: 60 minutes 30-60 minutes 1-2 hours

- NOTES: 1. All time requirements are based on optimum response conditions.
2. Figure 5-2, Emergency Response Organization, depicts functional levels beyond these augmented staffing requirements.
3. The Emergency Assistant Plant Manager may respond to the TSC.

Updated Clean Page of the Proposed Post-Shutdown Emergency Plan
(One page follows)

TABLE 5-1

MANPOWER, LOCATION, AND RESPONSE CONSIDERATIONS FOR EMERGENCIES
Page 2 of 2

B. AUGMENTED EMERGENCY RESPONSE STAFFING REQUIREMENTS

UNUSUAL EVENT		ALERT, SITE AREA EMERGENCY, GENERAL EMERGENCY	
PERSONNEL	TIME	PERSONNEL	TIME
<u>CONTROL ROOM</u> Emergency Assistant Plant Manager (1) ³	Alerted	<u>CONTROL ROOM</u> Emergency Assistant Plant Manager (1) ³	Normal Hours: 30 minutes Off Hours: 60 minutes
<u>OPERATIONS SUPPORT CENTER</u> OSC Manager (1) OSC RP Coordinator (1)	Alerted	<u>OPERATIONS SUPPORT CENTER</u> OSC Manager (1) OSC RP Coordinator (1) Mechanical Maintenance (1) Electrical Maintenance (1)	Normal Hours: 30 minutes Off Hours: 60 minutes
		RP Technician (1) Add Total (1) (2)	
		RP Technician (1) (3)	1-2 hours
<u>TECHNICAL SUPPORT CENTER</u> TSC Engineering Manager (1)	Alerted	<u>TECHNICAL SUPPORT CENTER</u> TSC Engineering Manager (1) Emergency Plant Manager (1) Emergency RP Manager (1)	As Required: Normal Hours: 30 minutes Off Hours: 60 minutes
		TSC I&C Engineer TSC Electrical Engineer TSC Mechanical Engineer	Call in as necessary 1-2 hours
<u>EMERGENCY OPERATIONS FACILITY</u> Emergency Director (1) Emergency Offsite Manager (1)	Alerted	<u>EMERGENCY OPERATIONS FACILITY</u> Emergency Offsite Manager (1) Dose Assessment Coordinator (1) Emergency Planning Advisor (1)	As Required: Normal Hours: 60 minutes Off Hours: 60 minutes
		RMTs (3)	30-60 minutes
		Emergency Director (1) Technical Liaison – EOF Communicator (1) State/County Communicator (1)	1-2 hours

- NOTES: 1. All time requirements are based on optimum response conditions.
2. Figure 5-2, Emergency Response Organization, depicts functional levels beyond these augmented staffing requirements.
3. The Emergency Assistant Plant Manager may respond to the TSC.