

UTILITY RADIOLOGICAL SAFETY BOARD
MEETING MINUTES
JULY 9, 2012

Mr. Michael Snee, Ohio Department of Health, called to order the July 9, 2012 meeting of the Utility Radiological Safety Board at 10:34 a.m. at the Davis-Besse Nuclear Power Station Administrative Building.

The first order of business from the agenda was the roll call taken by Ms. Tess Ocean.

I. ROLL CALL

EMERGENCY MANAGEMENT AGENCY
DEPARTMENT OF HEALTH
DEPARTMENT OF AGRICULTURE
PUBLIC UTILITIES COMMISSION
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF COMMERCE

MS. SIMA MERICK
MR. MICHAEL SNEE
MR. CHUCK KIRCHNER
MR. DAN FISHER
MR. KEVIN CLOUSE
MR. DEAN JAGGER

II. ANNOUNCEMENTS

Logistics of the tour of the plant following the URSB statutory meeting were discussed.

III. READING OF THE APRIL 9, 2012 MINUTES (ADOPTED)

The board dispensed with the reading of the April 9, 2012. Mr. Michael Snee, Ohio Department of Health, asked for additions, corrections or deletions to the minutes. Mr. Snee asked for a motion to approve the minutes. Mr. Chuck Kirchner, Ohio Department of Agriculture moved to adopt the minutes and Mr. Kevin Clouse, Ohio Environmental Protection Agency seconded. The motion carried.

IV. OLD BUSINESS

A. Updated Status of the URSB Initiative

Mr. Michael Bear of the Ohio Emergency Management Agency and Mr. Stephen Helmer of the Ohio Department of Health reviewed the URSB Initiatives. Topics briefed included the Beaver Valley Nuclear Power Station Evaluated Exercise, the Perry Nuclear Power Plant Cross-Cutting Human Performance Issues, After-Action Plan Activities, IZRRAG Activities, Reactor Oversight Program for Davis-Besse Nuclear Power Station, Beaver Valley Power Station and the Perry Nuclear Power Plant, Technology, State Dose Assessment, KI, REP Guidance and NRC Rulemaking, Procedural Review and the Joint Inspection Observation Program.

B. Midwestern Committee Report

Mr. Snee provided a brief over of the Midwestern Committee. He reported that the Midwestern Committee Council of State Governments looks at transportation issues regarding radioactive material across Midwestern states. Over the years, one of the big concerns has been the coordination of the transportation of transuranic shipments going out to waste isolation sites and projects such as Carlsbad, New Mexico. Routes are currently shut down through Ohio. Three sites in the country have any transuranic waste locations. If you are interested in information, please contact Mr. Snee or visit the Council of State Governments website.

V. NEW BUSINESS

A. URSB WG Quarterly Reports

Each of the participating URSB agencies provided a report of their respective state agency activities. Each agency's report is available upon request from the URSB Secretary.

B. Nuclear Regulatory Commission

Mr. Allan Barker of the Nuclear Regulatory Commission reported on the following topics: the oversight of the First Energy Nuclear Operating Company Plants and the Cross-Cutting Issue process. Mr. Barker's report is attached at the end of the Board-approved minutes.

The NRC reports that temporary instructions have been issued. These are procedures that are used to address more immediate issues across the United States. One instruction deals with seismic issues and the other instruction deals with flooding. Both are available on the NRC website.

C. Utility Reports

Mr. Ricky Collings, Supervisor of Fleet Emergency Preparedness provided an update on the Beaver Valley Power Station, the Davis-Besse Nuclear Power Station, Perry Nuclear Power Plant and FENOC. Specific topics of discussion included: the Beaver Valley Power Station Outage and Evaluated Exercise, the Davis-Besse Nuclear Power Station Shield Building Cracking-Results of the Bore Hole Examination during Refueling Outage and the Status of the License Renewal, the Perry Nuclear Power Plant Status of Cross-Cutting Areas of Human Performance and Reasons for Delaying the NRC June 2012 Confirmatory Inspection and Fuel Leakage and the FENOC Status of the MIDAS program, the Status of the new Emergency Operations Facilities and the Response to NRC's March 12, 2012 Letter Regarding Fukushima Recommendations. Mr. Collings report is attached at the end of the Board-approved minutes.

VI. MISCELLANEOUS

A. Location of the next URSB Meeting

The next URSB Statutory meeting will be held on October 9, 2012 in Columbiana County. Mr. Bear will try and coordinate with Mr. Darren Dodson, director of Columbiana County EMA.

B. Questions from the Public

There were no questions from the public.

Mr. Dwaine Warren of FEMA attended the meeting. He stated that representatives from FEMA are planning on attending the URSB meetings on a more regular basis. He stated that he oversees the southern part of the region, including Ohio, Indiana, Michigan and Illinois.

Mr. Warren commented that the ingestion pathway training went very well from feedback received.

Mr. Warren reported that the Radiological Accident and Assessment Course is available to be given in the field. The radiological program planning course will be undergoing changes. There are more classes that are pending.

The REP Program Manual roll-out roadshow went well and there was good attendance at all the sessions.

There are also changes with the hostile action based exercises and ingestion pathway cycle. There is an exercise at Palisades in Illinois in October and if anyone would like to observe at one of the other locations, please contact Mr. Bear. There will be an exercise at Fermi in August and if anyone is interested in observing this exercise, please contact Mr. Bear.

VII. ADJOURNMENT

Mr. Snee, Ohio Department of Health, asked if there was a motion to adjourn the meeting. Mr. Dan Fisher, Public Utilities Commission of Ohio, motioned to adjourn the meeting and Mr. Clouse, Ohio Environmental Protection Agency, seconded. The motion carried. The meeting was adjourned at 12:03 p.m.

Nuclear Regulatory Commission to the URSB

I will update the board on the NRC oversight activities at Davis-Besse, Perry and Beaver Valley.

In addition, I will provide a description of the Substantive Cross-Cutting Issue process as defined by Inspection Manual Chapter 0305, "Operating Reactor Assessment Program."

Davis-Besse Nuclear Power Plant

On April 23, 2012, the first quarter integrated inspection report for Davis-Besse was issued. Based on the results of this inspection, two NRC-identified findings of very low safety significance (Green) were identified. The findings are as follows:

- The inspectors identified a finding, with two examples, for the failure to maintain the electrical separation of the redundant safety-related direct current (DC) systems in compliance to the design and licensing bases. The licensee initiated corrective actions including opening the breakers to the non-safety-related loads inside containment and setting the automatic transfer switches (ATSS) to prevent auto-transfer of loads. Specifically, the failure to address the impact of high-impedance ground faults in non-safety equipment on safety-related DC sources impacted the reliability of the DC power system.
- The inspectors identified the failure to follow and maintain an emergency plan that meets the requirements of emergency planning standard 10 CFR 50.47(b) (4). Specifically, the licensee failed to maintain configuration control of seismic instrumentation necessary for the declaration of emergency events. The seismic instrumentation was out of service without the knowledge of the on-shift operating crew and no compensatory measures were in place. This finding affected the cornerstone objective of ensuring the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency.

NRC News Release No. III-12-023

As identified through News Release No. III-12-023, the NRC completed its review of FENOC's causal analysis of, and proposed corrective actions for, cracks in the shield building at the Davis-Besse Nuclear Power Station. The NRC has determined the report established a sufficient basis for its conclusions. FENOC concluded that cracks in the shield building were caused by environmental factors that resulted from the 1978 blizzard; the lack of moisture protective coating; and certain aspects of the shield building's design. The company submitted the root cause analysis of shield building cracks, which includes the company's proposed corrective actions and long-term monitoring program of the shield building, on February 28 in compliance with commitments the company made to the NRC.

The NRC will schedule a public meeting to discuss this issue, and the NRC's plans to monitor the plant's corrective actions. The NRC also conducted a detailed analysis of the company's corrective actions to ensure shield building safety going forward which included, additional tests and laboratory analysis of the shield building; applying a protective moisture coating on the building; and plans to restore the plant's design and licensing basis.

Perry Nuclear Power Plant

On April 24, 2012, the first quarter integrated inspection report for Perry was issued. Based on the results of this inspection, one self-revealed finding of very low safety significance (Green) was identified. The self-revealed finding is as follows:

- A self-revealed finding was identified for failure to assess and manage risk associated with maintenance activities. Specifically, the licensee planned and conducted maintenance on a stator water cooling system pressure gauge on March 1, 2012, as a lower risk evolution than required, and conducted the maintenance online despite several decision points which indicated that this maintenance should have been conducted with the unit offline. When performed on line, the activity caused a reactor scram.

NRC News Release No. III-12-016

The NRC has selected Jim Nance as the new resident inspector at Perry. Each commercial nuclear power plant site in the United States has at least two resident inspectors who monitor day-to-day operations at the plant. Nance joins Senior NRC Resident Inspector Mark Marshfield at the Perry facility.

BEAVER VALLEY

On April 30, 2012, the first quarter integrated inspection report for Beaver Valley Units 1 and 2 was issued. Based on the results of this inspection, three NRC-identified findings of very low safety significance (Green) were identified. The findings are as follows:

- The inspectors identified the failure to adequately control loose debris as required by procedures related to switchyard condition. Specifically, the inspectors identified unsecured debris in a large waste receptacle (dumpster) near the 1B System Station Service Transformer (SSST) which provides off-site power. FENOC took immediate corrective action to remove the debris, and performed frequent walk downs of the switchyard and offsite power sources.
- The inspectors identified the failure to adequately implement and maintain a replacement program for expansion joints installed in safety related systems. Specifically, rubber expansion joint REJ-1RW-24B was in service beyond the service life and degraded unacceptably while in service in the Unit 1 river water system.
- The inspectors identified that plant performed maintenance on the Unit 1 auxiliary feed water (AFW) system resulted in three inoperable AFW trains. Specifically, during maintenance, the auto-open feature of the AFW pumps discharge valves was removed.

IMC 0305, "Operating Reactor Assessment Program" Substantive Cross-Cutting Issues

The Reactor Oversight Process was developed with the presumption that plants that had significant performance issues with cross-cutting areas (CCAs) would be revealed through the existence of safety-

significant performance indicators or inspection findings. The NRC identifies a substantive cross-cutting issue (SCCI) to inform the licensee that the NRC has a concern with the licensee's performance in the cross-cutting area and to encourage the licensee to take appropriate actions before more significant performance issues emerge.

The cross-cutting components and aspects are described in Inspection Manual Chapter (IMC) 0310. CCAs are assigned and SCCIs are identified on a "per site" basis; not on a "per unit" basis. In order to determine whether SCCIs exist at a site, an assessment must be performed during the preparation for the mid-cycle and end-of-cycle assessment meetings.

Human Performance and Problem Identification and Resolution Themes:

A cross-cutting theme in the area of HU or PI&R exists if four or more of these findings were assigned the same CCA. The findings should be representative of more than one cornerstone; however, given the significant inspection effort applied to the Mitigating Systems Cornerstone, a cross-cutting theme can exist consisting of inspection findings associated with only this one cornerstone. Any regulatory action that does not constitute a finding (e.g., observations or enforcement actions) should not be considered in this determination.

Safety Conscious Work Environment Themes:

SCWE-related issues from an 18-month period shall be considered. Declining SCWE trends take time to manifest; similarly, they also require time to correct and improve. For this reason, an 18-month period after a SCWE theme is identified is warranted to assess the effectiveness of SCWE-related corrective actions. As such, the current mid- or end-of-cycle assessment period and the two quarters preceding that period shall be considered.

First Energy Nuclear Operating Company Report to the URSB

1) Beaver Valley Power Station

a) Outage

The following is a summary from the twenty-first refueling outage at Beaver Valley Unit 1:

- Dose: Dose for the outage is projected to 46,922 mrem which is less than the stretch goal of 48,000 mrem.
- Personal Contamination Event (PCE): The stretch goal was 13 PCE's or less. This goal was exceeded by five for a total of 18 PCE's.
- Safety: There was one OSHA Recordable and four First Aids. This performance was not in line with expectations. The post outage critique is being used to identify issues and improve performance going forward.
- Schedule: Overall Duration was 32 days, 5 hours, 28 minutes did not meet the Business Plan of 25 Days. Grappler issues resulted in an hour for hour slip in the schedule.
- Work Orders: The initial scope of work that was established at the scope control milestone freeze date was 1805 orders for a business plan duration of 25 days. During 1R21 there were a total of 342 orders (approximately 18.9%) added, 119 orders (approximately 6.5%) dropped and 129 orders (approximately 7.1%) changed work bringing the total number of orders completed during the outage to 1959.
- Engineering Change Packages: There were a total of 72 ECP's performed during 1R21 which included 21 emergent ECP packages.

A major challenge to the outage was when the refueling grappler tool became wedged onto a fuel assembly at core location F07. The refueling mast and fuel assembly were not aligned properly. Past industry practices have been to slightly raise the mast and then re-index it over the fuel assembly. This practice resulted in the grappler becoming wedged on to the top of the fuel assembly.

The root cause stated "The root cause was determined to be the accepted industry practice of re-indexing when misalignment occurs. This, combined with the lack of structured verification practices within the refueling procedures and the vendor's specification, allowed the refueling team to develop a mindset that there was not a potential for the Manipulator Crane gripper to become lodged in a fuel assembly top nozzle". The cause analysis also stated "The current process (prior to the 1R21 event), and industry common practice for engaging and latching a fuel assembly is to ensure that the crane mast is "on index" by viewing the marks provided on and adjacent to the crane bridge. If a slack cable indication is received and the Z-Z axis tape is reading high, the practice is to operate the hoist in an upward direction, and adjust the crane in the proper position to engage the respective fuel assembly".

Corrective actions to address the direct cause include:

- The Identification and implementation of a mechanism to preclude unintended mast rotation for normal fuel orientations for both the Unit 1 and Unit 2 Manipulator Cranes.
- Obtain acceptance criteria and revise and perform preventive maintenance on the Manipulator Crane Mast rollers, guides, keys and keyways (both units) to assure equipment is within acceptance criteria.

Revision of refueling procedures to provide more specific instruction for proper gripper to fuel assembly alignment. Some of the information which shall be included is:

- Refueling personnel roles and responsibilities.
- (Senior Reactor Operator (SRO) must verify water clarity is adequate to view top nozzle S-holes prior to core offload and Core Plate pins prior to core reload.
- When lowering the gripper assembly to latch fuel, downward motion shall be halted just prior to contact until a focused effort is made to ensure proper gripper to top nozzle alignment.
- A requirement to document precursor events such as the need to realign the gripper over the fuel assembly.
- If needed underwater video equipment shall be used to obtain visual verification as described in the Westinghouse Specification.

b) Evaluated Exercise

The 2012 Evaluated Exercise was completed on June 22, 2012 with exits by FEMA in both Region 3 and 5. The report has not yet been issued yet however the verbal results are:

State of Ohio

- No Issues

Columbiana County

- No Issues

Commonwealth of Pennsylvania

- No Issues

Beaver County

- 2 ARCAs – both re-demonstrated & closed
- 1 Planning Issue – closed

Four PA support counties

- No Issues

State of West Virginia

- 1 ARCA – re-demonstrated & closed
- 1 previous ARCA – closed
- 1 previous planning issue – closed

Hancock County

- 1 ARCA – re-demonstrated & closed
- 1 Planning Issue with a goal to have it closed before the Draft Reports is issued

The NRC debrief for Beaver Valley stated that there were no findings identified. One issue noted was that current station procedures require the Emergency Recovery Manager in the EOF to authorize dose assessment to run “what if” dose projections. One occasion was noted when that authorization was not given. No adverse result was noted for this lack of procedure compliance. BV Emergency Response is revising the procedure to eliminate this unnecessary restriction. The NRC also noted that the new EOF was a major improvement and is one of the best in Region 1.

2) Davis-Besse Nuclear Power Station

a) Shield Building Cracking – Results of Bore Hole Examination during Refueling Outage

The root cause was completed in February 2012 and determined that design features of the Shield Building in conjunction with the blizzard of 1978 resulted in stresses that caused the cracking. The results of the root cause will be presented at a public meeting on April 9, 2012.

Following the issuance of the root cause report additional actions involving further inspection and testing have been taken as follows:

- During the refueling outage in May 2012 nine core bores were inspected to confirm there were no changes in the condition of the building. These inspections included both cracked and uncracked core bores. No changes to the extent of cracking conditions were noted.
- Examinations are ongoing to complete inspection of all accessible portions of the Shield Building wall not observed in the fall of 2011. This activity is approximately 50% complete and the results have been consistent with conclusions in the root cause.
- A procedure for long term monitoring of the Shield Building has been issued and the first inspection will be complete by September 1, 2012.
- Testing has been conducted independently at two university laboratories to establish the capacity of rebar in cracked concrete. This testing has confirmed that substantial margin exists in the cracked regions.

To prevent further cracking, a sealant will be applied to the exterior of the Shield Building wall. This action is scheduled to be completed by the end of September 2012.

b) Status of License Renewal

Background: The original operating license for Davis-Besse will expire on April 22, 2017. FENOC has submitted an application for license renewal to extend the facility operating license to April 22, 2037. As part of this application, FENOC has developed programs to monitor the aging of structures and passive components* and will conduct inspections, many of which involve additional internal inspections and additional non-destructive examinations of these structures. The renewed license approval is dependent on NRC issuance of a final Safety Evaluation Report (SER) and a final site-specific Supplemental Environmental Impact Statement (SEIS). Several public advocacy groups oppose the issuance of the renewed license and have filed contentions before the NRC's Atomic Safety and Licensing Board (ASLB).

Schedule: The current schedule for review of the Davis-Besse application by the NRC can be found on the NRC website at www.nrc.gov/license_renewal/plant_status/Davis-Besse. A draft SER is scheduled to be issued by the NRC near the end of July 2012. Pending the resolution of five open items, the final SER is scheduled for issuance in October 2012. The schedule for issuance of the draft and final SEIS is under review by the NRC.

FUTURE ACTIVITIES:

1. SER Open Items: At this time there are five open items related to aging management programs for resolution before the final SER can be issued. The success path to resolution has been

identified by the FENOC project team. Pending near term submittal of docketed information and acceptable review by the NRC reviewers, the final SER schedule should not be affected.

2. Disposition of pending hearing before the NRC Atomic Safety and Licensing Board: Four public advocacy groups have been granted a hearing with respect to the Davis-Besse License Renewal application**. A portion of one contention (issue) related to alleged weakness in FENOC's SAMA analysis has been admitted for review by the Atomic Safety and Licensing Board (ASLB). The public advocacy groups have also requested that the ASLB admit another contention related to the Davis Besse Shield Building. They claim that the laminar cracking identified in the Shield Building should preclude the continued operation of Davis-Besse. The ASLB has yet to rule on this request to expand the hearing.
3. The potential for industry events that originate new regulatory requirements: Significant industry events, such as the Crystal River, Seabrook, or Davis-Besse structure-related issues, are often the origin of regulatory changes. Utilities must remain cognizant of current industry events and adjust aging management programs accordingly. For those applications under review, approval schedules may be affected by additional NRC requests or other regulatory actions.

*Passive components are those components which do not change position or state, i.e., the integrity of pressure boundary piping, the condition of insulation on electrical cables, or the structural condition of concrete.

**The four public advocacy groups that have been granted a hearing on the Davis-Besse license renewal application are: Citizens Environmental Alliance of Southwest Ontario; Don't Waste Michigan; the Green Party of Ohio; and Beyond Nuclear.

3) Perry Nuclear Power Plant

a) Status of Substantive Cross-Cutting Issues(SCCI) in Human Performance

Performance at the PNPP warranted sustaining of the cross-cutting theme in Human Performance. The site was able to close its longest standing open cross-cutting aspect in H.1.a, Planning, and continues to work to resolve the remaining two aspects H.1 (b), conservative assumptions, and H.2(c), documentation.

- The NRC identified a new substantive cross-cutting issue in Conservative Assumptions, H.1 (b). There were four findings during the last assessment cycle. At the close of 2011, PNPP was performing a cause evaluation and the corrective actions taken had not been in effect long enough to be proven effective at mitigating the theme although no new examples of shortfalls of this aspect had been identified in this quarter.
- The substantive cross-cutting issue in H.2(c) Documentation/Procedures remained open. During a December 2011 inspection, the NRC determined that PNPP evaluations and actions had not been completed to allow NRC review. Additionally, the corrective actions taken had not been in effect long enough to be proven effective at mitigating the theme although no new examples of shortfalls of this aspect had been identified in this quarter.

Update for 7/9/12 - Because the NRC was not able to inspect these substantive cross-cutting issues at the end of 2011 [since PNPP had not completed actions], the NRC requested PNPP provide the causes and corrective actions planned and completed for the two substantive cross-cutting issues in H.1(b) and H2(c). The NRC requested we submit in writing the corrective action plans, with projected dates for actions, and any metrics Perry is using to determine whether sustained improvement has been achieved. This letter was submitted on June 22, 2012.

i) Reasons for Delaying NRC June 2012 Confirmatory Inspection

PNPP is in the Degraded Cornerstone Column (i.e., Column 3) of the ROP because:

- A finding having a low-to-moderate safety significance (i.e., White) from the second quarter of 2011 and,
- A White Occupational Exposure Control Effectiveness Performance Indicator (PI) with four occurrences (the threshold for Green-to-White is more than 2 occurrences) during the second and third quarters of 2011.

The finding and the performance indicator were both in the Occupational Radiation Safety Cornerstone. PNPP will remain in Column 3 until a successful supplemental inspection in accordance with Inspection Procedure (IP) 95002, "Supplemental Inspection for One Degraded Cornerstone or Any Three White Inputs in a Strategic Performance Area" is completed. The NRC will conduct the inspection after PNPP has completed its investigation on the reasons for the White performance indicator and White finding in the same cornerstone and after PNPP advises the NRC that PNPP is ready for the inspection.

Update for 7/9/12 – PNPP management requested to delay the start of the 95002 inspection scheduled for 6/11/2012 because some questions arose regarding the completeness and adequacy of the corrective actions that were developed to address the root and contributing causes of the previously identified performance issues. PNPP requested additional time to conduct a further review to assure that the plant was adequately prepared for the NRC's supplemental inspection. The request was made because of two recent issues:

1. Access to Locked High Radiation Areas (LHRAs) in the Turbine Building (TB) lower levels was not controlled in accordance with site procedures. Specifically, equipment (scaffolding) was constructed in such a manner that access over the enclosure without Radiation Protection (RP) permission in the opinion of the inspectors. PNPP staff removed the scaffolding access ladder's lower six feet to preclude access for personnel to the scaffolding. However, inspectors felt that workers could access upper portions of the scaffolding by climbing on the sides of the scaffolding (not designed for this and it is against PNPP rules to do so). Some parts of the overhead areas above the scaffolding contain dose rates that would be defined as a LHRA.
2. Early on June 3, 2012, a Radiation Protection Technician observed water and a buildup of resin in the general access area of Radwaste Building 574' elevation. The significance of the changing radiological conditions was not fully realized until a survey was performed on the afternoon of June 7, 2012. This survey identified that dose rate levels from the resin changed the area from a High Radiation Area to a Locked High Radiation Area. Actions were immediately taken to properly control the area.

A cause analysis team was formed and they are working to determine the primary and contributing causes. The report will be independently reviewed following the FENOC process and be available shortly. The site is currently working with the regional inspectors to set the new date for the inspection which will likely occur in August and/or September.

b) Fuel defect

A small fuel defect was discovered when routine sampling of the station's off-gas system showed elevated levels of Xenon, indicating the presence of the defect. Power suppression testing, in which control rods are systematically inserted into different parts of the reactor core while off-gas samples are simultaneously collected, was completed and the location of the defect was found. An adjacent control

rod was inserted to suppress the power of the fuel bundle to prevent further deterioration of the fuel defect.

Later, based on off-gas samples, a second diagonally adjacent control rod was inserted to more fully suppress power of the defective bundle. This suppression will be in force throughout the operating cycle. Reactor water and off-gas samples continue to be monitored to ensure fuel barrier integrity.

The site has achieved more than seven years of operating fuel defect-free in large part due to the Fleet Fuel Reliability Program that:

- Strengthened the Foreign Material Exclusion program and its implementation
- Improved fuel handling practices
- Installed more robust fuel assemblies
- Developed advanced Reactor Core designs
- Implemented more conservative reactor handling guidelines and water chemistry controls

The site's next refueling outage in March 2013 will allow testing to identify the source of the defect and the fuel bundle/pin will be repaired or replaced.

4) FENOC

a) Status of MIDAS program

- Beaver Valley – The new MIDAS program is in full use at the new EOF. Training of on-shift dose assessors is in progress now that the outage has been completed. When the training is complete the site will be fully on the new MIDAS program.
- Perry – Training has been completed. The program is available and the site will cut over to MIDAS when they move into the new EOF in late July 2012.
- Davis-Besse – Work on revising the Emergency Plan to utilize NUREG 1228 source term methodology continues. Changing this will require a license amendment. The amendment is expected to be submitted later this year with the NRC review window of twelve months. MIDAS is not expected to be in use until late in 2013. Program development continues using the revised source term. Automatic population connections to both plant and simulator also continue to be developed. The current program for dose assessment (PCDose) will be in use in the new EOF when it is occupied in October 2012.

b) Status of new Emergency Operations Facilities

- Beaver Valley is complete. It was used for the recent Evaluated Exercise with excellent results.
- Perry is complete. Work to move into the facility continues with an open house scheduled for July 17, 2012. The transition will be completed soon afterwards.
- Davis-Besse is in the final stages of completion. Communications equipment and minor final punch list items are being completed. The occupancy permit has been received. The 30 minute ERO response issue has been resolved. Plan and procedure changes are drafted and are being reviewed including the 10 CFR 50.54(q) s needed to support the changes for the new EOF.

The open house has yet to be scheduled but tentatively is set for the end of October 2012.

c) Response to NRC's March 12, 2012 Letter Regarding Fukushima Recommendations

The NRC requested on March 12, 2012 licensees to respond to the recommendations of the Near Term Task Force Review of Insights from the Fukushima Daiichi Accident. The following is a summary of the combined response for Beaver Valley, Davis-Besse and Perry (letter dated June 11, 2012)

- 1) Communications – Requested to describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.

FENOC has ordered and is adding the following capabilities to each station:

- 18 satellite phones
 - 62 additional batteries
 - (2) 31 bay battery chargers
 - 31 DC automobile chargers
 - a solar charger
 - portable auxiliary antenna, antenna adapter and supporting cabling
 - (8) Fixed mast antennas and supporting cabling.
- 2) Staffing – Identify how the augmented staff would be notified given degraded communications capabilities
 - FENOC uses an “all respond” philosophy for major disasters. Changes to procedures at Beaver Valley and Perry to clarify the process to be the same wording used at Davis-Besse is in process.
 - The President and Chief Operating Officer signed an updated fleet level policy that has been issued to FENOC.
 - 3) Site Accessibility – Identify the methods of access (e.g. roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.
 - Each station has the use of state roads and an on site helicopter pad plus several other open areas to support helicopter landings. Davis-Besse and Perry are accessible from Lake Erie. Beaver Valley is accessible from the Ohio River. This provides land, water and air accessibility for each of the sites. Letters of agreement with states and counties provide a broad capability to get staff to the stations via roads, water and air.