

Peter P. Sena III
President and Chief Nuclear Officer

August 26, 2013
L-13-243

10 CFR 2.202

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

SUBJECT:

Beaver Valley Power Station, Unit Nos. 1 and 2
Docket No. 50-334, License No. DPR-66
Docket No. 50-412, License No. NPF-73
Davis-Besse Nuclear Power Station
Docket No. 50-346, License No. NPF-3
Perry Nuclear Power Plant
Docket No. 50-440, License No. NPF-58
FirstEnergy Nuclear Operating Company's (FENOC's) First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049) (TAC Nos. MF0841, MF0842, MF0961, and MF0962)

On March 12, 2012, the Nuclear Regulatory Commission (NRC or Commission) issued an order (Reference 1) to FENOC. Reference 1 was immediately effective and directs FENOC to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document Nuclear Energy Institute (NEI) 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the FENOC initial status report regarding mitigation strategies. Reference 5 provided the FENOC overall integrated plan for Beaver Valley Power Station, Unit Nos. 1 and 2 (BVPS), Davis-Besse Nuclear Power Station (DBNPS), and Perry Nuclear Power Plant (PNPP).

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the first six-month

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status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached reports for BVPS, DBNPS, and PNPP (Attachments 1, 2, and 3, respectively) provide an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at 330-315-6810.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 26, 2013.

Respectfully submitted,



Peter P. Sena, III

Attachments:

1. Beaver Valley Power Station First Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
2. Davis-Besse Nuclear Power Station First Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
3. Perry Nuclear Power Plant First Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

References:

1. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012
3. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012
4. FirstEnergy Nuclear Operating Company's (FENOC's) Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard

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- to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated October 26, 2012
5. FirstEnergy Nuclear Operating Company's (FENOC's) Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 27, 2013

cc: Director, Office of Nuclear Reactor Regulation (NRR)
NRC Region I Administrator
NRC Region III Administrator
NRC Resident Inspector (BVPS)
NRC Resident Inspector (DBNPS)
NRC Resident Inspector (PNPP)
NRC Project Manager (BVPS)
NRC Project Manager (DBNPS)
NRC Project Manager (PNPP)
Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC
Director BRP/DEP (without Attachments)
Site BRP/DEP Representative (without Attachments)
Utility Radiological Safety Board (without Attachments)

Beaver Valley Power Station First Six-Month Status Report for the Implementation of
Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation
Strategies for Beyond-Design-Basis External Events
Page 1 of 4

1 Introduction

FirstEnergy Nuclear Operating Company (FENOC) developed an Overall Integrated Plan (OIP) for Beaver Valley Power Station, Unit Nos. 1 and 2 (Reference 1 in Section 8), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the OIP, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since the submittal of the OIP (Reference 1). This update is current as of July 19, 2013.

- Completed review of the FLEX strategies following the submittal. FLEX strategies are unchanged, and a vendor has been selected to perform the detailed design engineering for the plant modifications.
- Submitted the Phase 1 staffing study (Reference 3) performed using the guidance in Nuclear Energy Institute (NEI) 12-01, *Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities*.
- Planned plant modifications have been targeted to the appropriate refueling outage and/or on-line work period.
- The Pressurized Water Reactors Owners Group (PWROG) has issued the generic FLEX Support Guidelines.

3 Milestone Schedule Status

The following provides an update to Attachment 2 of the OIP. It provides the activity status of each item and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

The following milestones are being added as part of this update.

Validation:

- Walk-throughs or Demonstrations: February-2015

The revised milestone target completion dates do not impact the order implementation date.

| Milestone | Target Completion Date | Activity Status (as of 7/19/13) | Revised Target Completion Date |
|--|------------------------|---------------------------------|--------------------------------|
| Submit FLEX Integrated Implementation Plan | 02/28/13 | Complete | |
| 6 Month NRC Status Updates | 08/28/15 | Started | |
| <i>Update 1</i> | 08/28/13 | Started | |
| <i>Update 2</i> | 02/28/14 | Not Started | |
| <i>Update 3</i> | 08/28/14 | Not Started | |
| <i>Update 4</i> | 02/27/15 | Not Started | |
| <i>Update 5</i> | 08/28/15 | Not Started | |
| Complete FLEX Strategy Review | March-2013 | Complete | |
| Validation | N/A | Not Started | February-2015 |
| <i>Walk-throughs or Demonstrations</i> | N/A | Not Started | February-2015 |
| Complete Staffing Analysis | November-2015 | Started | November-2014 |
| <i>Submit NEI 12-01 Phase 1 Staffing Study</i> | April-2013 | Complete | |
| <i>Submit NEI 12-01 Phase 2 Staffing Study</i> | November-2015 | Not Started | November-2014 |
| Complete Plant Modifications | November-2015 | Started | |
| <i>Target plant modifications</i> | April-2013 | Complete | |
| Unit 1 Modifications complete | May-2015 | Started | |
| <i>Complete 1R22 outage modifications</i> | November-2013 | Started | |
| <i>Complete on-line modifications</i> | February-2015 | Started | |
| <i>Complete 1R23 outage modifications</i> | May-2015 | Started | |
| Unit 2 Modifications complete | November-2015 | Started | |
| <i>Complete 2R17 outage modifications</i> | May-2014 | Started | |
| <i>Complete on-line modifications</i> | August-2015 | Started | |
| <i>Complete 2R18 outage modifications</i> | November-2015 | Started | |
| FLEX Storage Complete | March-2015 | Not Started | |
| <i>Complete Building Design</i> | December-2013 | Not Started | |
| <i>Commence Construction</i> | June-2014 | Not Started | |
| <i>Complete Construction</i> | March-2015 | Not Started | |
| River (UHS) Access Complete | October-2014 | Not Started | |
| <i>Fence & Gate Modification Design</i> | August-2013 | Not Started | February-2014 |
| <i>New Fence & Gate Construction</i> | August-2014 | Not Started | |
| <i>Security Barrier Pipe Penetrations Design</i> | January-2014 | Not Started | |
| <i>Security Barrier Pipe Penetration Construction</i> | October-2014 | Not Started | |
| On-site FLEX Equipment | June-2014 | Not Started | December-2014 |
| <i>Confirm FLEX Equipment Requirements</i> | April-2013 | Started | November-2013 |
| <i>FLEX Equipment Ordered</i> | May-2013 | Not Started | December-2013 |
| <i>FLEX Equipment Delivered</i> | May-2014 | Not Started | December-2014 |
| Off-site FLEX Equipment | April-2015 | Not Started | |
| <i>Develop Strategies with RRC</i> | November-2013 | Not Started | June-2014 |
| <i>Phase 3 Site Access Strategies in Place</i> | October-2014 | Not Started | |
| <i>Complete Near Site Staging Location (as needed)</i> | March-2015 | Not Started | April-2015 |

| Milestone | Target Completion Date | Activity Status (as of 7/19/13) | Revised Target Completion Date |
|--|------------------------|---------------------------------|--------------------------------|
| Procedures Complete | December-2014 | Started | |
| <i>PWROG issues NSSS-specific guidelines</i> | June-2013 | Complete | |
| <i>Issue Beaver Valley FSG</i> | June-2014 | Not Started | |
| <i>Issue Maintenance Procedures</i> | December-2014 | Not Started | |
| Training Complete | April-2015 | Started | |
| <i>Develop Training Plan</i> | September-2014 | Started | |
| <i>Implement Training</i> | October-2014 | Not Started | April-2015 |
| Submit Completion Report | November-2015 | Not Started | |

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the OIP (Reference 1).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

FENOC expects to comply with the order implementation date. Relief/relaxation is not required at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

The following tables provide a summary of the open items documented in the OIP or the draft safety evaluation (SE) and the status of each item.

| Overall Integrated Plan Open Item | Status |
|---|-------------|
| OI 1. Finalize the location of the FLEX storage building. The deployment routes, distances, and times provided in this report are bounded for the currently proposed locations but will be updated as necessary. | Not Started |
| OI 2. Perform containment evaluation based on the boundary conditions described in Section 2 of NEI 12-06. Based on the results of this evaluation, required actions to ensure maintenance of containment integrity and required instrument function will be developed. | Not Started |
| OI 3. Modify the RWST at each unit to protect it from tornado missiles or identify a borated source that is protected from tornados and can be utilized to provide core cooling when steam generators are not available. | Not Started |

| Draft Safety Evaluation Open Item | Status |
|-----------------------------------|--------|
| N/A | N/A |

7 Potential Draft Safety Evaluation Impacts

There are no potential impacts to the draft safety evaluation identified at this time.

8 References

The following references support the updates to the OIP described in this attachment.

1. FirstEnergy Nuclear Operating Company's (FENOC's) Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 27, 2013.
2. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012.
3. Response to NRC Letter, Request for Information Pursuant to Title 10 of the *Code of Federal Regulations* 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated April 29, 2013.

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Davis-Besse Nuclear Power Station First Six-Month Status Report for the
Implementation of Order EA-12-049, Order Modifying Licenses with Regard to
Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
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1 Introduction

FirstEnergy Nuclear Operating Company (FENOC) developed an Overall Integrated Plan (OIP) for Davis-Besse Nuclear Power Station (Reference 1 in Section 8), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the OIP, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since the submittal of the OIP (Reference 1). This update is current as of July 19, 2013.

- Planned plant modifications have been targeted to the appropriate refueling outage and/or on-line work period.

3 Milestone Schedule Status

The following provides an update to Attachment 2 of the OIP. It provides the activity status of each item and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

The following milestones are being added as part of this update.

Validation:

- Walk-throughs or Demonstrations: April-2016

The revised milestone target completion dates do not impact the order implementation date.

| Milestone | Target Completion Date | Activity Status (as of 7/19/13) | Revised Target Completion Date |
|--|------------------------|---------------------------------|--------------------------------|
| Submit FLEX Integrated Implementation Plan | 02/28/13 | Complete | |
| 6 Month NRC Status Updates | 02/28/16 | Started | |
| <i>Update 1</i> | 08/28/13 | Started | |
| <i>Update 2</i> | 02/28/14 | Not Started | |
| <i>Update 3</i> | 08/28/14 | Not Started | |
| <i>Update 4</i> | 02/27/15 | Not Started | |
| <i>Update 5</i> | 08/28/15 | Not Started | |
| <i>Update 6</i> | 02/28/16 | Not Started | |
| Validation | N/A | Not Started | April-2016 |
| <i>Walk-throughs or Demonstrations</i> | N/A | Not Started | April-2016 |
| Complete Staffing Analysis | November-2015 | Not Started | October-2015 |
| <i>Submit NEI 12-01 Phase 2 Staffing Study</i> | November-2015 | Not Started | October-2015 |
| Complete Plant Modifications | April-2016 | Started | |
| <i>Target plant modifications</i> | May-2013 | Complete | |
| <i>Modifications complete</i> | April-2016 | Started | |
| <i>Complete 1R18 outage modifications</i> | June-2014 | Complete* | |
| <i>Complete on-line modifications</i> | February-2016 | Started | |
| <i>Complete 1R19 outage modifications</i> | April-2016 | Started | |
| <i>Complete Communications Modifications</i> | April-2016 | Started | |
| <i>Complete SFP Level Indication Modifications</i> | April-2016 | Started | |
| FLEX Storage Complete | April-2016 | Not Started | |
| <i>Complete Building Design</i> | December-2014 | Not Started | |
| <i>Commence Construction</i> | June-2015 | Not Started | |
| <i>Complete Construction</i> | April-2016 | Not Started | |
| On-site FLEX Equipment | April-2016 | Started | |
| <i>Confirm FLEX Equipment Requirements</i> | January-2014 | Started | |
| <i>FLEX Equipment Ordered</i> | January-2015 | Not Started | |
| <i>FLEX Equipment Delivered</i> | April-2016 | Not Started | |
| Off-site FLEX Equipment | April-2016 | Not Started | |
| <i>Develop Strategies with RRC</i> | June-2014 | Not Started | |
| <i>Phase 3 Site Access Strategies in Place</i> | April-2016 | Not Started | |
| <i>Complete Near Site Staging Location (as needed)</i> | April-2016 | Not Started | |
| Procedures Complete | April-2016 | Started | |
| <i>PWROG issues NSSS-specific guidelines</i> | June-2013 | Started | August-2013 |
| <i>Issue Davis-Besse FLEX Strategy Guidelines</i> | June-2014 | Not Started | June-2015 |
| <i>Issue Maintenance Procedures</i> | April-2016 | Not Started | |
| Training Complete | April-2016 | Not Started | |
| <i>Develop Training Plan</i> | September-2015 | Not Started | |
| <i>Implement Training</i> | April-2016 | Not Started | |
| Submit Completion Report | April-2016 | Not Started | |

* Modifications are targeted for 1R19 and on-line; none targeted for 1R18.

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the OIP (Reference 1).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

FENOC expects to comply with the order implementation date. Relief/relaxation is not required at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

The following tables provide a summary of the open items documented in the OIP or the draft safety evaluation (SE) and the status of each item.

| Overall Integrated Plan Open Item | Status |
|---|---------|
| OI 1. Finalize locations for FLEX storage buildings. Deployment routes, distances and times contained in the submittal are bounded for the currently proposed locations but will be updated as necessary. | Started |
| OI 2. Finalize the strategy for providing a protected source of borated water to support FLEX strategies. | Started |
| OI 3. Determine if a mobile boration unit and/or water purification unit is required to support the FLEX strategies. | Started |

| Draft Safety Evaluation Open Item | Status |
|-----------------------------------|--------|
| N/A | N/A |

7 Potential Draft Safety Evaluation Impacts

There are no potential impacts to the draft safety evaluation identified at this time.

8 References

The following references support the updates to the OIP described in this attachment.

1. FirstEnergy Nuclear Operating Company's (FENOC's) Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 27, 2013.
2. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012.

Perry Nuclear Power Plant First Six-Month Status Report for the Implementation of
Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation
Strategies for Beyond-Design-Basis External Events
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1 Introduction

FirstEnergy Nuclear Operating Company (FENOC) developed an Overall Integrated Plan (OIP) for Perry Nuclear Power Plant (Reference 1 in Section 8), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the OIP, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since the submittal of the OIP (Reference 1). This update is current as of July 19, 2013.

- Completed review of the FLEX strategies following the submittal. FLEX strategies are unchanged, and a vendor has been selected to perform the detailed design engineering for the plant modifications.
- Planned plant modifications have been targeted to the appropriate refueling outage and/or on-line work period.

3 Milestone Schedule Status

The following provides an update to Attachment 2 of the OIP. It provides the activity status of each item and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

The following milestones are being added as part of this update.

Validation:

- Walk-throughs or Demonstrations: March-2015

The following milestones replace previous modification milestones.

Complete Plant Modifications:

- Target plant modifications
- Complete on-line modifications
- Complete 1R15 outage modifications

The revised milestone target completion dates do not impact the order implementation date.

| Milestone | Target Completion Date | Activity Status (as of 7/19/13) | Revised Target Completion Date |
|---|------------------------|---------------------------------|--------------------------------|
| Submit FLEX Integrated Implementation Plan | 02/28/13 | Complete | |
| 6 Month Status Updates | 02/27/15 | Started | |
| <i>Update 1</i> | 08/01/13 | Started | |
| <i>Update 2</i> | 02/28/14 | Not Started | |
| <i>Update 3</i> | 08/28/14 | Not Started | |
| <i>Update 4</i> | 02/27/15 | Not Started | |
| FLEX Strategy Review | May-2013 | Complete | |
| Validation | N/A | Not Started | March-2015 |
| <i>Walk-throughs or Demonstrations</i> | N/A | Not Started | March-2015 |
| Complete Staffing Analysis* | January-2014 | Not Started | October-2014 |
| Complete Plant Modifications | April-2015 | Started | March-2015 |
| <i>Target plant modifications</i> | May-2013 | Complete | |
| <i>Complete on-line modifications</i> | December-2014 | Started | |
| <i>Complete 1R15 outage modifications</i> | February-2015 | Started | March-2015 |
| FLEX Storage | January-2015 | Not Started | |
| <i>Complete Unit 2 Aux Building for storage and Use</i> | January-2015 | Not Started | |
| <i>Convert Unit 2 diesel Building for storage and Use</i> | January-2015 | Not Started | |
| Lake (UHS) Access | November-2014 | Started | |
| <i>Regrade road to barge slip area</i> | October-2014 | Not Started | |
| <i>Fence & Gate Construction modifications</i> | October-2014 | Not Started | |
| <i>Security Barrier Pipe Penetrations Design</i> | January-2014 | Started | February-2014 |
| <i>Security Barrier Pipe Penetration Construction</i> | November-2014 | Not Started | |
| On-site FLEX Equipment | January-2015 | Not Started | October-2014 |
| <i>Ordered</i> | August-2013 | Not Started | November-2013 |
| <i>Delivered</i> | January-2015 | Not Started | October-2014 |
| Off-site FLEX Equipment | March-2015 | Not Started | |
| <i>Develop Strategies with RRC</i> | December-2013 | Not Started | June-2014 |
| <i>Complete Near Site Staging Location (as needed)</i> | March-2015 | Not Started | |
| <i>Phase 3 Site Access Strategies in Place</i> | November-2014 | Not Started | |
| Procedures | March-2015 | Started | |
| <i>Implement EPG/SAG Rev 3 Guidance</i> | August-2014 | Started | |
| <i>Create Perry FSG</i> | May-2014 | Not Started | |
| <i>Implement Perry FSG</i> | March-2015 | Not Started | |
| <i>Create Maintenance Procedures</i> | July-2014 | Not Started | |
| Training | March-2015 | Started | |
| <i>Develop EOP Training Plan</i> | January-2014 | Started | |
| <i>Implement EOP Training</i> | July-2014 | Not Started | March-2015 |
| <i>Develop SAMG Training Plan</i> | January-2014 | Not Started | |

| Milestone | Target Completion Date | Activity Status (as of 7/19/13) | Revised Target Completion Date |
|-----------------------------------|-------------------------------|--|---------------------------------------|
| <i>Implement SAMG Training</i> | January-2015 | Not Started | March-2015 |
| <i>Develop FLEX Training Plan</i> | August-2014 | Not Started | |
| <i>Implement FLEX Training</i> | November-2014 | Not Started | March-2015 |
| Submit Completion Report | March-2015 | Not Started | |

*Changed milestone from Perform Staffing Analysis to Complete Staffing Analysis.

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the OIP (Reference 1).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

FENOC expects to comply with the order implementation date. Relief/relaxation is not required at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

None.

7 Potential Draft Safety Evaluation Impacts

There are no potential impacts to the draft safety evaluation identified at this time.

8 References

The following references support the updates to the OIP described in this attachment.

1. FirstEnergy Nuclear Operating Company's (FENOC's) Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12 -049), dated February 27, 2013.
2. NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, dated March 12, 2012.