



**Entergy Nuclear Northeast
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Brian R. Sullivan
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JAFP-15-0104
August 28, 2015

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

Subject: Fifth 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)

James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
License No. DPR-059

- Reference:**
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. Entergy to NRC, JAFP-12-0124, Initial 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), dated October 29, 2012
 5. Entergy to NRC, JAFP-13-0025, 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 28, 2013

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission (“NRC” or “Commission”) issued an order [Reference 1] to James A. FitzPatrick Nuclear Power Plant (JAF). Reference 1 was immediately effective and directed JAF 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.2. Reference 2 endorsed industry guidance document NEI 12-06, Revision 0 [Reference 3] with clarifications and exceptions identified in Reference 2. Reference 4 provided the JAF initial status report regarding mitigation strategies. Reference 5 provided the JAF overall integrated plan.

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 fifth six-month 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 report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact Chris M. Adner, Regulatory Assurance Manager, at 315-349-6766.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 28th day of August, 2015.

Sincerely,



Brian R. Sullivan
Site Vice President

BRS/CMA/mh

Attachment: James A. FitzPatrick Nuclear Power Plant's (JAF) Fifth 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

cc: Director, Office of Nuclear Reactor Regulation
NRC Regional Administrator
NRC Resident Inspector
Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC
Mr. Douglas Pickett, Senior Project Manager
Ms. Bridget Frymire, NYSPSC
Mr. John B. Rhodes, President NYSERDA

JAFP-15-0104

Attachment

James A. FitzPatrick Nuclear Power Plant's (JAF) Fifth 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

(12 Pages)

James A. FitzPatrick Nuclear Power Plant's (JAF) Fifth 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

1. Introduction

JAF developed an Overall Integrated Plan (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 last status report (Reference 7), 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 January 31, 2015, and are current as of July 31, 2015.

- Fourth Six-Month Status Report – February 2015 (JAFP-15-0026)

3. Milestone Schedule Status

Following is an update to Attachment 2 of the Overall Integrated Plan. 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.

Milestone	Target Completion Date*	Activity Status	Revised Target Completion Date
60-day Status Update	October 29, 2012	Complete	
Submit Overall Integrated Plan	February 28, 2013	Complete	
Six-Month Status Report	August 2013	Complete	
Refine Strategies	December 2014	Complete	
Perform Staffing Analysis	June 2015	In progress	May 2016
Develop Strategies / Contract with RRC	May 2015	Started	October 30, 2015
Six-Month Status Report	February 2014	Complete	
Develop Mods	June 2015	Started	December 23, 2015
Draft Implementing Procedures	June 2016	Not Started	
Regional Response Center Operational	July 2015	Complete	
Develop Storage Plan	June 2015	Started	December 23, 2015
Purchase FLEX Equipment	Fall 2016	Not Started	
Issue Maintenance Procedures (for FLEX equipment)	Fall 2016	Not Started	
Six-Month Status Report	August 2014	Complete	
Develop Training Plan	November 2015	Not Started	April 2016

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Milestone	Target Completion Date*	Activity Status	Revised Target Completion Date
Refueling Outage 1	Fall 2014	Complete	
Six-Month Status Report	February 2015	Complete	
Implement Training	March 2016	Not Started	Fall 2016
Implement Mods (non-outage)	June 2015	Not Started	May 31, 2016
Six-Month Status Report	August 2015	Complete	
Six-Month Status Report	February 2016	Not Started	
Issue Implementing Procedures	May 2016	Not Started	
Six-Month Status Report	August 2016	Not Started	
Implement Mods (outage)	Fall 2016	Not Started	
Implement Training Updates	Fall 2016	Not Started	
Refueling Outage 2 (full implementation)	Fall 2016	Not Started	
Validation / Demonstration	Fall 2016	Not Started	

*Target Completion Date is the last submitted date from either the overall integrated plan or a previous six-month status report.

4. Changes to Compliance Method

During the design phase of the JAF FLEX project, changes were identified to the compliance strategy as documented in the Overall Integrated Plan (OIP) and updates (References 1, 3, 5, 6, and 7). The changes since the last update are summarized below. These changes will be incorporated in the Final Integrated Plan (FIP).

- Page 15 of the OIP identifies containment essential instrumentation. As discussed in the response to AQ 6, torus pressure, drywell pressure, and drywell water level are not required to be on that list.
- Page 33 of the OIP states that the FLEX pump will provide 200 gpm makeup water to the SFP via the existing B.5.b spray nozzles. The JAF design minimum pumping capacity is 250 gpm to the SFP, which addresses overspray and guarantees 200 gpm delivered to the SFP.
- Page 39 of the OIP states that portable fans will be used to provide ventilation in the Main Control Room (MCR) and the DC Equipment Rooms during Phase 2. Calculations JAF-CALC-MISC-04509 and JAF-CALC-14-00027 determined that ventilation is not required for the MCR, Battery Rooms and DC Equipment Rooms, therefore no portable fans will be provided for Phase 2.
- Page 45 of the OIP identifies the BWR Portable Equipment requirements for Phase 2. The revised JAF strategy no longer requires four portable diesel driven fire pumps

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because the existing installed diesel driven fire pumps will be credited for Phase 2. The page also identifies the requirement for three portable ventilation fans for Phase 2. No ventilation fans will be credited in the Phase 2 strategy.

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

JAF expects to comply with the order implementation date and no relief/relaxation is required at this time.

6. Open Items from Overall Integrated Plan and Interim Staff Evaluation

The following tables provide a summary and status of any open items documented in the Overall Integrated Plan and any open items or confirmatory items documented in the Interim Staff Evaluation (ISE) (Reference 4). A fourth table includes the status of each FitzPatrick Audit Question for the Mitigation Strategies (FLEX) Order.

Overall Integrated Plan Open Items		Status
OI-1:	Beyond-design-basis external event impact on requirements in existing licensing documents will be determined based on input from the industry groups and direction from the NRC.	Complete/Closed Entergy has determined that update to existing licensing basis documents are not required to reflect BDBEEs.
OI-2:	The structure, content and details of the Regional Response Center playbook will be determined.	Started

Interim Staff Evaluation Open Items		Status
3.1.1.3.A	Procedural Interface (Seismic Hazard) - Evaluate the impacts from large internal flooding sources. (Audit Question 5)	This item is addressed by updated AQ JAF-005 response.
3.1.3.1.A	Protection of FLEX Equipment (High Wind Hazard) - Evaluate the separation distance and the axis of separation considering the predominant path of tornados in the geographic area to demonstrate that at least N sets of FLEX equipment would remain deployable in the context of a tornado missile hazard. (Audit Question 1)	In Progress. This item will be addressed by update to AQ JAF-001 response when information is available.
3.1.4.2.B	Deployment of FLEX Equipment (Snow, Ice and Extreme Cold) - Evaluate the potential impact on the UHS due to ice blockage or formation of frazil ice as a result of extreme cold.	Complete. This item is addressed on the updated AQ response spreadsheet on the ePortal.

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Interim Staff Evaluation Open Items		Status
3.2.3.A	Containment- Verify that the implementation of Boiling Water Reactor Owners Group (BWROG) Emergency Procedure Guideline (EPG)/Severe Accident Guideline (SAG), Revision 3, including any associated plant-specific evaluations, has been completed in accordance with the provisions of NRC letter dated January 9, 2014 (Reference 23 of ISE - Letter from Jack R. Davis (NRC) to Joseph E. Pollock (NEI) dated January 9, 2014, regarding Boiling Water Reactor Containment Venting (ADAMS Accession No. ML 13358A206))	In Progress. This item is addressed by updated AQ JAF-017 response.

Interim Staff Evaluation Confirmatory Items		Status
3.1.1.2.A	Deployment of FLEX Equipment- Confirm that soil liquefaction will not impede vehicle movement following a seismic event.	In Progress. This item will be addressed by update to AQ JAF-002 response when information is available.
3.1.1.2.B	Deployment of FLEX Equipment- Confirm final design features of the new storage building including the susceptibility to the loss of ac power to deploy equipment.	In Progress. This item will be addressed by update to AQ JAF-001 response when information is available.
3.1.1.2.C	Deployment of FLEX Equipment - Confirm the storage locations and means of protection against the seismic hazard of the super duty pickup trucks and the two flatbed trailers used for deployment of FLEX equipment.	In Progress. This item will be addressed by update to AQ JAF-001 response when information is available.
3.1.1.4.A	Offsite Resources- Confirm location of offsite staging area(s), access routes and methods of delivery of equipment to the site considering the seismic, flood, high wind, snow, ice and extreme cold hazards.	In Progress. This item will be addressed by update to AQ JAF-043 response when information is available.

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Interim Staff Evaluation Confirmatory Items		Status
3.1.3.2.A	Deployment of FLEX Equipment (High Wind Hazard) - Confirm availability of debris removal equipment to facilitate deployment of FLEX equipment.	Complete This item is addressed on the AQ response spreadsheet on the ePortal.
3.1.3.2.B	Deployment of FLEX Equipment (High Wind Hazard) - Confirm protection of the means to move FLEX equipment.	In Progress. This item will be addressed by update to AQ JAF-001 response when information is available.
3.1.4.2.A	Deployment of FLEX Equipment (Snow, Ice and Extreme Cold) - Confirm availability of snow removal equipment to facilitate deployment of FLEX equipment.	In Progress. This item will be addressed by update to AQ JAF-001 response when information is available.
3.2.1.1.A	Computer Code Used for Extended Loss of AC Power (ELAP) Analysis - Benchmarks need to be identified and discussed which demonstrate that Modular Accident Analysis Program (MAAP) is an appropriate code for the simulation of an ELAP event at JAF.	Complete. This item is addressed by updated AQ JAF-009 response.
3.2.1.1.B	Computer Code Used for ELAP Analysis -Confirm that the collapsed level remains above Top of Active Fuel (TAF) and the cool down rate is within technical specifications limits.	Complete. This item is addressed by updated AQ JAF-012 response.
3.2.1.1.C	Computer Code Used for ELAP Analysis - Confirm that MAAP was used in accordance with Sections 4.1, 4.2, 4.3, 4.4, and 4.5 of the June 2013 position paper (ADAMS Accession No. ML 13190A201).	Complete. This item is addressed by updated AQ JAF-010 response.
3.2.1.1.D	Computer Code Used for ELAP Analysis - Confirm that the licensee, in using MAAP, identified and justified the subset of key modeling parameters cited from Tables 4-1 through 4-6 of the "MAAP Application Guidance, Desktop Reference for Using MAAP Software, Revision 2" (Electric Power Research Institute Report 1 020236).	Complete. This item is addressed by updated AQ JAF-011 response.

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Interim Staff Evaluation Confirmatory Items		Status
3.2.1.1.E	Computer Code Used for ELAP Analysis - Confirm that the specific MAAP analysis case that was used to validate the timing of mitigating strategies in the Integrated Plan has been identified and is available for NRC staff to review. Alternately, a comparable level of information has been included in the supplemental response. In either case, the analysis should include a plot of the collapsed vessel level to confirm that TAF is not reached (the elevation of the TAF should be provided) and a plot of the temperature cool down to confirm that the cool down is within technical specifications limits.	Complete. This item is addressed by updated AQ JAF-009 response.
3.2.1.2.A	Recirculation Pump Seal Leakage Models - Confirm the seal leakage model used in the updated MAAP analysis (which will address the MAAP code limitations when used for ELAP analysis). Evaluate the seal leakage rate model used, the details of the seal qualification tests and supporting test data, and leakage rate pressure-dependence.	Complete. This item is addressed by updated AQ JAF-014 response.
3.2.1.3.A	Sequence of Events (SOE) - Confirm the SOE timeline after reanalysis using the MAAP code which will address the limitations when used for the ELAP analysis.	Complete. This item is addressed by updated AQ JAF-012 response.
3.2.1.4.A	Systems and Components for Consequence Mitigation - Confirm sizing of the FLEX pumps and 600 Vac FLEX diesel generator (DG) and the 4160 Vac generator to be obtained from the RRC.	In Progress. This item will be addressed by update to AQ JAF-022 response when information is available.
3.2.1.5.A	Monitoring Instrumentation and Controls- Confirm ac powered torus temperature, pressure and level and drywell temperature and pressure instrumentation is modified to remain powered during an ELAP.	Complete. This item is addressed by updated AQ JAF-006 response.
3.2.1.8.A	Use of Portable Pumps - Confirm that the use of raw water from Lake Ontario for long term core and spent fuel pool cooling strategies is acceptable.	Complete. This item is addressed by updated AQ JAF-023 response.
3.2.2.A	Spent Fuel Pool Cooling - Confirm the method of ventilation and power requirements, if any, of the spent fuel pool area.	Complete. This item is addressed by updated AQ JAF-028 response.

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Interim Staff Evaluation Confirmatory Items		Status
3.2.4.2.A	Ventilation (Equipment Cooling) - Confirm that additional evaluations of the RCIC room temperature demonstrate that an acceptable environment is maintained during the transition phase both for equipment in the room and habitability for operators who may need to enter the room.	Complete. This item is addressed by updated AQ JAF-031 response.
3.2.4.2.B	Ventilation (Equipment Cooling) - Confirm that evaluations of the battery room temperature demonstrate that an acceptable environment, during both high ambient temperature and during extreme cold ambient temperature, is maintained during Phases 2 and 3.	Complete. This item is addressed by updated AQ JAF-069 response.
3.2.4.2.C	Ventilation (Equipment Cooling) - Confirm the required ventilation flow or the size of the portable fans to maintain acceptable environmental conditions in the DC equipment room.	Complete. This item is addressed by updated AQ JAF-061 response.
3.2.4.3.A	Heat Tracing - Confirm completion of walkdowns and evaluation of where heat tracing may be needed for freeze protection of equipment or instruments used in the ELAP mitigation strategies.	In Progress. This item will be addressed by update to AQ JAF-035 response when information is available.
3.2.4.4.A	Lighting - Confirm need for additional portable lighting, such as dc powered lights.	In Progress. This item will be addressed by update to AQ JAF-036 response when information is available.
3.2.4.4.B	Communications - Confirm that upgrades to the site's communication system have been completed.	NRC Confirmatory Action
3.2.4.8.A	Electrical Power Sources - Confirm the technical basis for the selection and size of the FLEX generators to be used in support of the coping strategies.	In Progress. This item will be addressed by update to AQ JAF-050 response when information is available.

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Interim Staff Evaluation Confirmatory Items		Status
3.2.4.10.A	Load Reduction to Conserve DC Power - Confirm final load shed list and the evaluation of any potential adverse effects of shedding those loads.	In Progress. This item will be addressed by update to AQ JAF-052 response when information is available.
3.2.4.10.B	Load Reduction to Conserve DC Power - Confirm the final dc load profile with the required loads and the finalized minimum battery voltage.	In Progress. This item will be addressed by update to AQ JAF-066 response when information is available.
3.2.4.10.C	Load Reduction to Conserve DC Power- Confirm time after the ELAP for connecting the FLEX DG to the battery chargers.	In Progress. This item will be addressed by update to AQ JAF-052 response when information is available.
3.4.A	Off-site Resources- Confirm that NEI 12-06, Section 12.2 guidelines 2 through 10 are addressed, or that an appropriate alternative is justified.	In Progress. This item will be addressed by update to AQ JAF-043 response when information is available.

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Audit Questions	Status	Completion or Target Date
JAF-001	In progress - This AQ response will be updated when information is available (associated with ISE Open Item 3.1.3.1.A and ISE Confirmatory Items 3.1.1.2.B, 3.1.1.2.C, 3.1.3.2.B, 3.1.4.2.A)	February 2016
JAF-002	In progress - This AQ response will be updated when information is available (associated with ISE Confirmatory Item 3.1.1.2.A)	February 2016
JAF-003	In progress - This AQ response will be updated when information is available	February 2016
JAF-004	In progress - This AQ response will be updated when information is available	February 2016
JAF-005	Updated response available on the ePortal (associated with ISE Open Item 3.1.1.3.A)	Complete (with update)
JAF-006	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.5.A)	Closed
JAF-008	In progress - This AQ response will be updated when information is available	February 2016
JAF-009	Updated response available on the ePortal (associated with ISE Confirmatory Items 3.2.1.1.A, 3.2.1.1.E)	Complete (with update)
JAF-010	Updated response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.1.C)	Complete (with update)
JAF-011	Updated response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.1.D)	Complete (with update)
JAF-012	Updated response available on the ePortal (associated with ISE Confirmatory Items 3.2.1.1.B, 3.2.1.3.A)	Complete (with update)
JAF-013	Updated response available on the ePortal	Complete (with update)
JAF-014	Updated response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.2.A)	Complete (with update)
JAF-015	Updated response available on the ePortal	Complete (with update)
JAF-016	Closed* Response available on the ePortal	Closed
JAF-017	In progress. Updated response available on the ePortal (associated with ISE Open Item 3.2.3.A)	February 2016
JAF-018	Updated response available on the ePortal	Complete (with update)
JAF-019	Updated response available on the ePortal	Complete (with update)

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Audit Questions	Status	Completion or Target Date
JAF-021	Closed* response available on the ePortal	Closed
JAF-022	Updated response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.4.A)	Complete (with update)
JAF-023	Updated response available on the ePortal (associated with ISE Confirmatory Item 3.2.1.8.A)	Complete (with update)
JAF-026	Closed* Response available on the ePortal	Closed
JAF-027	Updated response available on the ePortal	Complete (with update)
JAF-028	Closed* Response available on the ePortal (associated with ISE Confirmatory Item 3.2.2.A)	Closed
JAF-029	Closed* Response available on the ePortal	Closed
JAF-031	Updated response available on the ePortal (associated with ISE Confirmatory Item 3.2.4.2.A)	Complete (with update)
JAF-032	Closed* Response available on the ePortal	Closed
JAF-033	Updated response available on the ePortal	Complete (with update)
JAF-034	Closed* Response available on the ePortal	Closed
JAF-035	In progress - This AQ response will be updated when information is available (associated with ISE Confirmatory Item 3.2.4.3.A)	February 2016
JAF-036	In progress - This AQ response will be updated when information is available (associated with ISE Confirmatory Item 3.2.4.4.A)	February 2016
JAF-037	Closed* Response available on the ePortal	Closed
JAF-038	Closed* Response available on the ePortal	Closed
JAF-040	Updated response available on the ePortal	Complete (with update)
JAF-043	In progress - This AQ response will be updated when information is available (associated with ISE Confirmatory Items 3.1.1.4.A, 3.4.A)	February 2016
JAF-046	Closed* Response available on the ePortal	Closed
JAF-049	Closed* Response available on the ePortal	Closed
JAF-050	In progress - This AQ response will be updated when information is available (associated with ISE Confirmatory Item 3.2.4.8.A)	February 2016

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Audit Questions	Status	Completion or Target Date
JAF-052	In progress - This AQ response will be updated when information is available (associated with ISE Confirmatory Items 3.2.4.10.A, 3.2.4.10.C)	February 2016
JAF-053	Closed* Response available on the ePortal	Closed
JAF-055	Updated response available on the ePortal	Complete (with update)
JAF-056	In progress - This AQ response will be updated when information is available	February 2016
JAF-057	Updated response available on the ePortal	Complete (with update)
JAF-058	In progress - This AQ response will be updated when information is available	Complete (with update)
JAF-059	Updated response available on the ePortal	Complete (with update)
JAF-060	In progress - This AQ response will be updated when information is available	February 2016
JAF-061	Updated response available on the ePortal (associated with ISE Confirmatory Item 3.2.4.2.C)	Complete (with update)
JAF-062	In progress - This AQ response will be updated when information is available	February 2016
JAF-063	Closed* Response available on the ePortal	Closed
JAF-064	In progress - This AQ response will be updated when information is available	February 2016
JAF-065	In progress - This AQ response will be updated when information is available	February 2016
JAF-066	In progress - This AQ response will be updated when information is available (associated with ISE Confirmatory Item 3.2.4.10.B)	February 2016
JAF-068	Closed* Response available on the ePortal	Closed
JAF-069	Updated response available on the ePortal (associated with ISE Confirmatory Item 3.2.4.2.B)	Complete (with update)
JAF-071	Closed* Response available on the ePortal	Closed
JAF-072	Closed* Response available on the ePortal	Closed
JAF-073	Closed* Response available on the ePortal	Closed

*Closed indicates that Entergy's response is complete.

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7. Potential Interim Staff Evaluation Impacts

In addition to the changes to compliance methods identified in Section 4 the items discussed below have potential impact on the Interim Staff Evaluation since the last 6-month update.

- ISE/TER Section 3.2.4.2, Pages 41 and 42, the Technical Evaluation Report (TER) states that portable fans will be used to provide ventilation in the MCR and the DC equipment rooms during Phase 2. Calculations JAF-CALC-MISC-04509 and JAF-CALC-14-00027 determined that ventilation is not required, therefore no portable fans will be provided for Phase 2.

8. References

The following references support the updates to the Overall Integrated Plan described in this attachment.

1. Entergy to NRC, JAFP-13-0025, 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 28, 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. Entergy to NRC, JAFP-13-0112, 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), dated August 28, 2013.
4. NRC letter, James A. FitzPatrick Nuclear Power Plant – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC No. MF1077), dated February 21, 2014
5. Entergy to NRC, JAFP-14-0023, Second 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), dated February 28, 2014
6. Entergy to NRC, JAFP-14-0105, Third 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), dated August 28, 2014
7. Entergy to NRC, JAFP-15-0026, Fourth 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), dated February 27, 2015
8. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012