



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 23, 2013

To Those on the Enclosed List

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ASSOCIATED WITH  
NEAR-TERM TASK FORCE RECOMMENDATION 2.3, FLOODING  
WALKDOWNS

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff issued a letter requesting additional information per Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hereafter called the 50.54(f) letter). The 50.54(f) letter requested that licensees conduct flooding hazard walkdowns to verify the plant configuration with the current licensing basis. The licensees stated by letter that the flooding walkdowns would be performed in accordance with Nuclear Energy Institute 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features," May 2012. Following the NRC staff's initial review of the walkdown reports, regulatory site audits were conducted at a sampling of plants. Based on the walkdown report reviews and site audits, the staff identified additional information necessary to allow the staff to complete its assessments.

Enclosed is a request for additional information (RAI) related to flooding walkdowns. The NRC staff requests that you respond no later than January 31, 2014. If you have any questions related to the enclosed RAI or the requested submission date, please contact your assigned plant Project Manager.

Sincerely,

A handwritten signature in black ink that reads "Robert J. Pascarelli FOR RJP".

Robert J. Pascarelli, Chief  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Enclosures:

1. Request for Additional Information
2. Addressee List

cc w/encls: Listserv

## REQUEST FOR ADDITIONAL INFORMATION

### Flooding Walkdowns

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff issued a letter (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12053A340) requesting additional information per Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hereafter called the 50.54(f) letter). The 50.54(f) letter requested that licensees conduct flooding hazard walkdowns to identify and address plant-specific degraded, nonconforming, or unanalyzed conditions through the corrective action program (CAP). All licensees stated by letter that the flooding walkdowns would be performed in accordance with Nuclear Energy Institute (NEI) 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features," May 2012 (ADAMS Accession No. ML12172A038). Following the NRC staff's initial review of the reports documenting the results of the licensees' walkdowns, regulatory site audits were conducted at a sample of plants. Based on the walkdown report reviews and site audits, the staff identified additional information necessary to allow the staff to complete its assessments.

#### **Determination and documentation of available physical margin (APM)**

##### **Background:**

The NRC staff observed that several licensees did not consistently determine and/or document available physical margin (APM) in a manner that met the expected interpretation of NEI 12-07 during audits associated with review of the NTTF Recommendation 2.3 report submittals. APM is defined in section 3.13 of NEI 12-07 and the process for obtaining and evaluating APM values is described in section 5.8 of NEI 12-07. Consistent with NEI 12-07, a numerical value for APM should be determined and documented for every applicable flood protection feature (e.g., wall, penetration, berm, door, etc.). This would normally be a numerical value reflecting the difference between the licensing basis flood height at the location of the feature and the point at which the function of the flood protection feature is compromised (e.g., the top of a barrier or the height of the first unsealed penetration in a barrier) such that the resulting flood can affect a structures, systems, and components important to safety. Next, in accordance with Section 5.8 of NEI 12-07, if the APM appears to be small and the consequences of flooding appear to be significant, the licensee should enter the condition into the CAP and appropriate action be taken. While NEI 12-07 does not require that a specific numerical threshold value for "small" APM be defined for each site, doing so establishes a consistent basis for determining what instances need to be entered into the CAP. If a numerical APM value cannot be determined for any flood protection feature, the licensee should perform an assessment of the ability of the barrier to withstand the licensing basis flood plus the contribution of the additional water corresponding to the pre-established small-margin threshold value. If the barrier can withstand this flood, the APM for the feature is "not small" and further evaluation in accordance with Section 5.8 of NEI 12-07 is not required. It is further noted that conclusions regarding "large" values of APM should be based on engineering evaluations or existing design documents.

Licensees should ensure that the process for APM determination and evaluation used during their flooding walkdowns is consistent with the guidance in NEI 12-07. The intent of this RAI is not to repeat the flooding walkdowns or perform an extensive revision of the walkdown record

forms and other paperwork. Instead the purpose is to verify or modify the process used to determine APM such that every site is aware of the margin at each of its flood protection features and take appropriate interim actions when the APM is small and the consequences are significant. Instances where numerical values for APM were not determined, or where the basis for the APM was found to be questionable, should be rectified by either the documentation of a specific value or an explanation of why a non-numerical value is appropriate.

**Request:**

Please provide the following:

1. Confirmation that the process for evaluating APM was reviewed;
2. Confirmation that the APM process is now or was always consistent with the guidance in NEI 12-07 and discussed in this RAI;
3. If changes are necessary, a general description of any process changes to establish this consistency;
4. As a result of the audits and subsequent interactions with industry during public meetings, NRC staff recognized that evaluation of APM for seals (e.g., flood doors, penetrations, flood gates, etc.) was challenging for some licensees. Generally, licensees were expected to use either Approach A or Approach B (described below) to determine the APM for seals:
  - a) If seal pressure ratings were known, the seal ratings were used to determine APM (similar to example 2 in Section 3.13 of NEI 12-07). A numerical value for APM was documented. No further action was performed if the APM value was greater than the pre-established small-margin threshold value. If the APM value was small, an assessment of "significant consequences" was performed and the guidance in NEI 12-07 Section 5.8 was followed.
  - b) If the seal pressure rating was not known, the APM for seals in a flood barrier is assumed to be greater than the pre-established small-margin threshold value if the following conditions were met: (1) the APM for the barrier in which the seal is located is greater than the small-margin threshold value and there is evidence that the seals were designed/procured, installed, and controlled as flooding seals in accordance with the flooding licensing basis. Note that in order to determine that the seal has been controlled as a flooding seal, it was only necessary to determine that the seal configuration has been governed by the plant's design control process since installation. In this case, the APM for the seal could have been documented as "not small".

As part of the RAI response, state if either Approach A or Approach B was used as part of the initial walkdowns or as part of actions taken in response to this RAI. No additional actions are necessary if either Approach A or B was used.

If neither Approach A or B was used to determine the APM values for seals (either as part of the walkdowns or as part of actions taken in response to this RAI), then perform the following two actions:

- Enter the condition into the CAP (note: it is acceptable to utilize a single CAP entry to capture this issue for multiple seals). CAP disposition of “undetermined” APM values for seals should consider the guidance provided in NEI 12-07, Section 5.8. The CAP disposition should confirm all seals can perform their intended safety function against floods up to the current licensing basis flood height. Disposition may occur as part of the Integrated Assessment. If an Integrated Assessment is not performed, determine whether there are significant consequences associated with exceeding the capacity of the seals and take interim action(s), if necessary, via the CAP processes. These actions do not need to be complete prior to the the RAI response.
- Report the APM as “undetermined” and provide the CAP reference in the RAI response.

## List of Addressees

Arkansas Nuclear One, Units 1 and 2  
Docket Nos. 50-313 and 50-368

Vice President, Operations  
Arkansas Nuclear One  
Entergy Operations, Inc.  
1448 S.R. 333  
Russellville, AR 72802

Beaver Valley Power Station, Units 1 and 2  
Docket Nos. 50-334 and 50-412

Mr. Eric A. Larson, Site Vice President  
FirstEnergy Nuclear Operating Company  
Beaver Valley Power Station  
Mail Stop A-BV-SEB1  
P.O. Box 4, Route 168  
Shippingport, PA 15077

Browns Ferry Nuclear Plant, Units 1, 2, and 3  
Docket Nos. 50-259, 50-260 and 50-296

Mr. Joseph W. Shea  
Vice President, Nuclear Licensing  
Tennessee Valley Authority  
1101 Market Street, LP 3D-C  
Chattanooga, TN 37402-2801

Byron Station, Units 1 and 2/Braidwood Station,  
Units 1 and 2  
Docket Nos. 50-454, 50-455, 50-456, and 50-457

Mr. Michael J. Pacilio, Senior Vice President  
Exelon Generation Company, LLC  
President and Chief Nuclear Office (CNO) - Exelon  
Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

Callaway Plant, Unit 1  
Docket No. 50-483

Mr. Adam C. Heflin  
Senior Vice President and Chief Nuclear Officer  
Union Electric Company  
Ameren Missouri  
P.O. Box 620  
Fulton, MO 65251

Calvert Cliffs Nuclear Power Plant, Units 1 and 2  
Docket Nos. 50-317 and 50-318

Mr. George H. Gellrich, Vice President  
Calvert Cliffs Nuclear Power Plant, LLC.  
Calvert Cliffs Nuclear Power Plant  
1650 Calvert Cliffs Parkway  
Lusby, MD 20657-4702

Catawba Nuclear Station, Units 1 and 2  
Docket Nos. 50-413 and 50-414

Mr. Kelvin Henderson, Site Vice President  
Duke Energy Carolinas, LLC  
Catawba Nuclear Station, Units 1 & 2  
4800 Concord Road  
York, SC 29745

Clinton Power Station, Unit No. 1  
Docket No. 50-461

Mr. Michael J. Pacilio, Senior Vice President  
Exelon Generation Company, LLC  
President and Chief Nuclear Office (CNO) Exelon  
Nuclear  
4300 Winfield Rd.  
Warrenville, IL 60555

Columbia Generating Station  
Docket No. 50-397

Mr. Mark E. Reddemann, Chief Executive Officer  
Energy Northwest  
MD 1023, North Power Plant Loop  
P.O. Box 968  
Richland, WA 99352

Comanche Peak Nuclear Power Plant, Units 1 and 2  
Docket Nos. 50-445 and 50-445

Mr. Rafael Flores  
Senior Vice President & Chief Nuclear Officer  
Attention: Regulatory Affairs  
Luminant Generation Company LLC  
P.O. Box 1002  
Glen Rose, TX 76043

Cooper Nuclear Station  
Docket No. 50-298

Mr. Oscar A. Limpas, Vice President-Nuclear and  
Chief Nuclear Officer  
Nebraska Public Power District  
Cooper Nuclear Station  
72676 648A Avenue  
P.O. Box 98  
Brownville, NE 68321

Davis-Besse Nuclear Power Station, Unit 1  
Docket No. 50-346

Mr. Ray Lieb, Vice President  
FirstEnergy Nuclear Operating Company  
c/o Davis-Besse NPS  
5501 N. State Route 2  
Oak Harbor, OH 43449-9760

Donald C. Cook Nuclear Plant, Units 1 and 2  
Docket Nos. 50-315 and 50-316

Mr. Lawrence J. Weber  
Senior Vice President and Chief Nuclear Officer  
Indiana Michigan Power Company  
Nuclear Generation Group  
One Cook Place  
Bridgman, MI 49106

Diablo Canyon Power Plant, Unit Nos. 1 and 2  
Docket Nos. 50-275 and 50-323

Mr. Edward D. Halpin, Senior Vice President and  
Chief Nuclear Officer  
Pacific Gas and Electric Company  
P.O. Box 56  
Mail Code 104/6  
Avila Beach, CA 93424

Dresden Nuclear Power Station, Units 2 and 3  
Docket Nos. 50-237 and 50-249

Mr. Michael J. Pacilio, Senior Vice President  
Exelon Generation Company, LLC  
President and Chief Nuclear Office Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

Duane Arnold Energy Center  
Docket No. 50-331

Mr. Rich Anderson, Site Vice President  
Next Era Energy  
Duane Arnold Energy Center  
3277 DAEC Road  
Palo, IA 52324-9785

Edwin I. Hatch Nuclear Plant Units 1 and 2  
Docket Nos. 50-321 and 50-366

Mr. C. R. Pierce, Regulatory Affairs Director  
Southern Nuclear Operating Co., Inc.  
P.O. Box 1295 / BIN B038  
Birmingham, AL 35201-1295

Fermi, Unit 2  
Docket No. 50-341

Mr. Joseph H. Plona, Senior VP and Chief Nuclear  
Officer  
Detroit Edison Company  
Fermi 2 - 210 NOC  
6400 North Dixie Highway  
Newport, MI 48166

Fort Calhoun Station, Unit 1  
Docket No. 50-285

Mr. Louis Cortopassi, Vice President and Chief  
Nuclear Officer  
Omaha Public Power District  
Fort Calhoun Station  
Mail Stop FC-2-4  
9610 Power Lane  
Blair, NE 68008

Grand Gulf Nuclear Station, Unit 1  
Docket No. 50-416

Vice President, Operations  
Entergy Operations, Inc.  
Grand Gulf Nuclear Station  
P.O. Box 756  
Port Gibson, MS 39150

H. B. Robinson Steam Electric Plant, Unit No. 2  
Docket No. 50-261

Mr. William R. Gideon, Vice President  
H.B. Robinson Steam Electric Plant  
Duke Energy Progress, Inc.  
3581 West Entrance Road  
Hartsville, SC 29550

Indian Point Nuclear Generating Unit Nos. 2 and 3  
Docket Nos. 50-247 and 50-286

Vice President, Operations  
Entergy Nuclear Operations, Inc.  
Indian Point Energy Center  
450 Broadway, GSB  
P.O. Box 249  
Buchanan, NY 10511-0249

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

Mr. Chris Adner, Licensing Manager  
Entergy Nuclear Operations, Inc.  
James A. FitzPatrick Nuclear Power Plant  
P.O. Box 110  
Lycoming, NY 13093

Joseph M. Farley Nuclear Plant, Units 1 and 2  
Docket Nos. 50-348 and 50-364

Mr. C. R. Pierce, Regulatory Affairs Director  
Southern Nuclear Operating Co., Inc.  
P.O. Box 1295 / BIN 038  
Birmingham, AL 35201-1295

LaSalle County Station, Units 1 and 2  
Docket Nos. 50-373 and 50-374

Mr. Michael J. Pacilio, Senior Vice President  
Exelon Generation Company, LLC  
President and Chief Nuclear Office (CNO) Exelon  
Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

Limerick Generating Station, Units 1 and 2  
Docket Nos. 50-352 and 50-353

Mr. Michael J. Pacilio, President and Chief Nuclear  
Officer  
Exelon Nuclear  
4300 Winfield Rd.  
Warrenville, IL 60555

Monticello Nuclear Generating Plant, Unit 1  
Docket No. 50-263

Ms. Karen D. Fili, Site Vice President  
Northern States Power Company - Minnesota  
Monticello Nuclear Generating Plant  
2807 West County Road 75  
Monticello, MN 55362-9637

Nine Mile Point Nuclear Station, Units 1 and 2  
Docket Nos. 50-220 and 50-410

Mr. Christopher Costanzo, Vice President  
Nine Mile Point Nuclear Station, LLC  
P. O. Box 63  
Lycoming, NY 13093

North Anna Power Station, Units 1 and 2  
Docket Nos. 50-338 and 50-339

Mr. David A. Heacock, President and Chief Nuclear  
Officer  
Virginia Electric & Power Company  
Innsbrook Technical Center  
5000 Dominion Blvd.  
Glen Allen, VA 23060

Oconee Nuclear Station, Units 1, 2 and 3  
Docket Nos. 50-236, 50-270 and 50-287

Mr. Scott Batson  
Vice President, Oconee Nuclear Station  
Duke Energy Carolinas, LLC  
7800 Rochester Highway  
Seneca, SC 29672

Palisades Nuclear Plant  
Docket No. 50-355

Mr. Anthony J. Vitale, Vice President, Operations  
Entergy Nuclear Operations, Inc.  
Palisades Nuclear Plant  
27780 Blue Star Memorial Highway  
Covert, MI 49043-9530

Palo Verde Nuclear Generating Station, Units 1, 2,  
and 3  
Docket Nos. 50-528, 50-529 and 50-530

Mr. Randall K. Edington  
Executive Vice President Nuclear/CNO  
Arizona Public Service Company  
P.O. Box 52034, MS 7602  
Phoenix, AZ 85072-2034

Peach Bottom Atomic Power Station, Units 2 and 3  
Docket Nos. 50-277 and 50-278

Mr. Michael J. Pacilio, President and Chief Nuclear  
Officer  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

Perry Nuclear Power Plant, Unit 1  
Docket No. 50-440

Mr. Ernest J. Harkness, President and Chief  
Nuclear Officer  
FirstEnergy Nuclear Operating Company  
Perry Nuclear Power Plant  
10 Center Road, A290  
Perry, OH 44081

Pilgrim Nuclear Power Station Unit No. 1  
Docket No. 50-293

Mr. John Dent, Jr., Vice President – Site VP  
Pilgrim Nuclear Power Station  
600 Rocky Hill Road  
Plymouth, MA 02360-5508

Point Beach Nuclear Plant, Units 1 and 2  
Docket Nos. 50-266 and 50-301

Mr. Larry Meyer, Site Vice President  
NextEra Energy Point Beach, LLC  
Point Beach Nuclear Plant, Units 1 & 2  
6610 Nuclear Road  
Two Rivers, WI 54241-9516

Prairie Island Nuclear Generating Plant,  
Units 1 and 2  
Docket Nos. 50-282 and 50-306

Mr. James E. Lynch, Site Vice President  
Northern States Power Company - Minnesota  
Prairie Island Nuclear Generating Plant  
1717 Wakonade Drive East  
Welch, MN 55089-9642

R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

Mr. Joseph E. Pacher, Vice President  
R.E. Ginna Nuclear Power Plant  
R.E. Ginna Nuclear Power Plant, LLC  
1503 Lake Road  
Ontario, NY 14519

River Bend Station, Unit 1  
Docket No. 50-458

Vice President, Operations  
Entergy Operations, Inc.  
River Bend Station  
5485 U.S. Highway 61N  
St. Francisville, LA 70775

Seabrook Station, Unit No. 1  
Docket No. 50-443

Mr. Kevin Walsh, Site Vice President  
c/o Michael Ossing  
Seabrook Station  
NextEra Energy Seabrook, LLC  
P.O Box 300  
Seabrook, NH 03874



Sequoyah Nuclear Plant, Units 1 and 2  
Docket Nos. 50-327 and 50-328

Mr. Joseph W. Shea  
Vice President, Corporate Nuclear Licensing  
Tennessee Valley Authority  
3R Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

Shearon Harris Nuclear Power Plant, Unit 1  
Docket No. 50-400

Mr. Ernest J. Kapopoulos, Jr., Vice President  
Duke Energy Progress, Inc.  
Shearon Harris Nuclear Power Plant  
P.O. Box 165, Mail Zone 1  
New Hill, NC 27562-0165

South Texas Project, Units 1 and 2  
Docket Nos. 50-498 and 50-499

Mr. Dennis L. Koehl, President and CEO/CNO  
STP Nuclear Operating Company  
South Texas Project Electric Generating Station  
P.O. Box 289  
Wadsworth, TX 77483

St. Lucie Plant Units 1 and 2  
Docket Nos. 50-335 and 50-289

Mr. Mano Nazar, Executive VP and Chief Nuclear  
Officer  
NextEra Energy  
P. O. Box 14000  
700 Universe Boulevard  
Juno Beach, FL 33408-0420

Surry Power Station, Unit Nos. 1 and 2  
Docket Nos. 50-280 and 50-281

Mr. David A. Heacock, President & Chief Nuclear  
Officer  
Virginia Electric & Power Company  
5000 Dominion Blvd.  
Glen Allen, VA 23060

Susquehanna Steam Electric Station, Units 1 and 2  
Docket Nos. 50-387 and 50-388

Mr. Timothy S. Rausch, Senior Vice President and  
Chief Nuclear Officer  
PPL Susquehanna, LLC  
769 Salem Boulevard  
NUCSB3  
Berwick, PA 18603-0467

Three Mile Island Nuclear Station, Unit 1  
Docket No. 50-289

Mr. Michael J. Pacilio, President and Chief Nuclear  
Officer  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

Turkey Point Units 3 and 4  
Docket Nos. 50-250 and 50-251

Mr. Mano Nazar, Executive VP and Chief Nuclear  
Officer  
NextEra Energy  
P. O. Box 14000  
Juno Beach, FL 33408-0420

Virgil C. Summer Nuclear Station, Unit 1  
Docket No. 50-395

Mr. Thomas D. Gatlin, Vice President  
Nuclear Operations  
South Carolina Electric & Gas Company  
Virgil C. Summer Nuclear Station  
Post Office Box 88, Mail Code 800  
Jenkinsville, SC 29065

Vogtle Electric Generating Plant, Units 1 and 2  
Docket Nos. 50-424 and 50-425

Mr. C. R. Pierce, Regulatory Affairs Director  
Southern Nuclear Operating Co., Inc.  
P.O. Box 1295 / BIN 038  
Birmingham, AL 35201-1295

Waterford Steam Electric Station, Unit 3  
Docket No. 50-382

Vice President, Operations  
Entergy Operations, Inc.  
Waterford Steam Electric Station, Unit 3  
17265 River Road  
Killona, LA 70057-0751

Watts Bar Nuclear Plant, Unit 1  
Docket No. 50-390

Mr. Joseph W. Shea, Corporate Manager, Nuclear  
Licensing  
Tennessee Valley Authority  
1101 Market Street, LP 3D-C  
Chattanooga, TN 37402-2801

William B. McGuire Nuclear Station, Units 1 and 2  
Docket Nos. 50-369 and 50-370

Mr. Steven D. Capps, Vice President  
McGuire Site  
Duke Energy Carolinas, LLC  
McGuire Nuclear Station  
12700 Hagers Ferry Road  
Huntersville, NC 28078-8985

Wolf Creek Generating Station, Unit 1  
Docket No. 50-482

Mr. Matthew W. Sunseri  
President and Chief Executive Officer  
Wolf Creek Nuclear Operating Corporation  
P.O. Box 411  
Burlington, KS 66839

December 23, 2013

To Those on the Enclosed List

**SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ASSOCIATED WITH  
NEAR-TERM TASK FORCE RECOMMENDATION 2.3, FLOODING  
WALKDOWNS**

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Sincerely,

*/ra/ (G.E. Miller for)*

Robert J. Pascarelli, Chief  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Enclosures:

1. Request for Additional Information
2. Addressee List

cc w/encls: Listserv

DISTRIBUTION:

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**ADAMS Accession No. ML13325A891**

**\*via e-mail**

|        |                   |                                   |                  |
|--------|-------------------|-----------------------------------|------------------|
| OFFICE | NRR/JLD/PMB       | NRR/DORL/LPL4-1/LA                | NRO/DSEA/RHMB/BC |
| NAME   | RKuntz            | JBurkhardt                        | SFlanders *      |
| DATE   | 11/22/13          | 11/22/13                          | 12/19/13         |
| OFFICE | NRR/JLD/PMB/BC    | NRR/DORL/LPLII-1/BC (GMiller for) |                  |
| NAME   | LMR for MMitchell | RPascarelli                       |                  |
| DATE   | 12/23/13          | 12/23/13                          |                  |

**OFFICIAL RECORD COPY**

Letter to Selected Power Reactor Licensees from Robert J. Pascarelli dated December 23, 2013

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ASSOCIATED WITH  
NEAR-TERM TASK FORCE RECOMMENDATION 2.3, FLOODING  
WALKDOWNS

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RidsNrrPMOconee  
RidsNrrPMPalisades  
RidsNrrPMPaloVerde  
RidsNrrPMPeachBottom  
RidsNrrPMPerry  
RidsNrrPMPilgrim  
RidsNrrPMPPointBeach  
RidsNrrPMPrairieIsland  
RidsNrrPMREGinna  
RidsNrrPMRiverBend  
RidsNrrPMRobinson  
RidsNrrPMSeabrook  
RidsNrrPMSequoyah  
RidsNrrPMShearonHarris  
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RidsNrrPMStLucie  
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RidsNrrPMSusquehanna  
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RidsNrrPMWolfCreek