May 2, 2000

Mr. Craig G. Anderson
Vice President, Operations ANO
Entergy Operations, Inc.
1448 SR 333
Russellville, Arkansas 72801

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE ARKANSAS NUCLEAR ONE, UNIT 1, LICENSE RENEWAL APPLICATION

Dear Mr. Anderson:

By letter dated January 31, 2000, Entergy Operations, Inc. (Entergy), submitted for the Nuclear Regulatory Commission's (NRC's) review an application pursuant to 10 CFR Part 54, to renew the operating license for Arkansas Nuclear One, Unit 1, (ANO-1). The NRC staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete its safety review. Specifically, the enclosed questions are from the Plant Systems Branch regarding Sections 2.3.2.4, 2.3.2.5, 2.3.2.6, 2.3.2.7, 2.3.2.8, 2.3.3.11, 2.3.3.12, 2.3.3.13, 2.4 and 3.7.

Please provide a schedule by letter, electronic mail, or telephonically for the submittal of your responses within 30 days of the receipt of this letter. Additionally, the staff would be willing to meet with Entergy prior to the submittal of the responses to provide clarifications of the staff's requests for additional information.

Sincerely,

/**RA**/

Robert J. Prato, Project Manager
License Renewal Project Directorate
Division of Regulatory Improvement Program
Office of Nuclear Reactor Regulation

Docket No. 50-313

Enclosure: Request for Additional Information

cc w/encl: See next page

May 2, 2000

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REQUEST FOR ADDITIONAL INFORMATION
ARKANSAS NUCLEAR ONE, UNIT 1
LICENSE RENEWAL APPLICATION, SECTIONS 2.3.2.4, 2.3.2.5, 2.3.2.6, 2.3.2.7, 2.3.2.8, 2.3.3.11, 2.3.3.12, 2.3.3.13, 2.4, and 3.7

2.3.2 ENGINEERING SAFEGUARDS (2.3.2.4 REACTOR BUILDING SPRAY, 2.3.2.5 REACTOR BUILDING COOLING AND PURGE, 2.3.2.6 SODIUM HYDROXIDE, 2.3.2.7 REACTOR BUILDING ISOLATION, AND 2.3.2.8 HYDROGEN CONTROL SYSTEMS)

2.3.2-1 In piping and instrumentation diagrams (P&ID) LRA-M-230, sheet 1, the containment boundary and isolation valves of the high pressure nitrogen line highlighted in the flow diagram are not clearly defined. Provide additional details (e.g., a sketch) for this portion of the containment isolation system.

2.3.2-2 In P&ID LRA-M-237, sheet 1, the redundant isolation valves (SS-1017B, SS-1018B) for the test connections of the sampling system are not highlighted as being within the scope of license renewal. However, containment isolation provisions require double isolation at the test connections for greater assurance of containment integrity. Provide a justification as to why the second isolation valve on each test connection is not in-scope.

2.3.2-3 Section 2.3.2.7 of the LRA states that the reactor building isolation system also seals penetrations that are not required for operation to provide a fission product barrier between the inside of the reactor building and the outside environment. However, Table 3.3-7 of the LRA only lists the piping, bolting, and valves as the components of the containment isolation system within the scope of license renewal. There are typically more components within a penetration isolation boundary other than piping, bolting, and valves that perform this intended function, such as leak-testable blank flange, weld end cap, orifice, and flow monitor (if any). Verify the list of the components to include all the components in the reactor building isolation barriers that are subject to an aging management review (AMR) for license renewal. Also, the valve type, such as check, motor operated, remote manual or hand valve, used for the containment isolation purpose, should be identified in the table.

2.3.2-4 In P&ID LRA-M-261, sheet 1, the 2-inch temporary duct of the reactor building cooling and purge system from the supply air plenum to the box of temperature detectors is not identified as being within the scope of components subject to an AMR. Provide a justification for not including the duct in the scope of components subject to an AMR.

2.3.2-5 The hydrogen control system is in scope. However, some of the system lines attached to the hydrogen control system outside the containment and the hydrogen samplers, such as the hydrogen purge air system and post-accident gas sampling system, as seen in P&ID LRA-M-261, sheet 3, are not highlighted as being in scope of components subject to an AMR.

Provide justification for excluding these system lines from the scope of components subject to an AMR.

2.3.2-6 In P&ID LRA-M-233, sheet 1, the chemical addition system is within the scope of license renewal, but the sodium hydroxide recirculating pump line from the chemical addition system to the sodium hydroxide storage tank is not highlighted as being in-scope. Provide justification for excluding the pump line from the scope of components subject to an AMR.

2.3.2-7 Section 2.3.2.4 of the LRA states that the components of the reactor building spray system within the scope of license renewal consists of both trains of pumps and supporting equipment (lube oil coolers and seal water cyclone separators), piping, valves, and spray headers. The sodium thiosulfate storage tank and its piping connected to the spray system, as seen in P&ID LRA-M-236, sheet 1, are not highlighted as being in-scope and are not included in Table 3.3-4 of the LRA for an AMR. Provide justification for excluding the thiosulfate storage tank and its piping from the scope of components subject to an AMR.

2.3.2-8 Table 3.3-4 of the LRA listed the piping, tubing, and valves as the components subject to an AMR for the reactor building spray system. However, in Table 3.3-5 of the LRA for the reactor building cooling and purge system and Table 3.3-8 of the LRA for the hydrogen control system, tubing is not listed as the components subject to an AMR even though the tubes are used in the systems and are addressed in the notes of the tables. Identify where the AMR for tubing can be found in the LRA or provide a justification for excluding this tubing from the scope of components subject to an AMR.

NOTE: All P&IDs references in the request for additional information (RAI) for Sections 2.3.3.11, 2.3.3.12, and 2.3.3.13 relate to the LRA series of drawings provided in LRA Table 2.3-7.

2.3.3.11 PENETRATION ROOM VENTILATION SYSTEM (PRVS)

2.3.3.11-1 Several components, identified on P&ID M-264, Sheet 1, as being within the scope of license renewal, are not included on Table 3.4-11. Table 3.4-11 lists the components subject to an AMR for the PRVS. Identify whether the following components are subject to an AMR, and if so, provide the relevant information about the components to complete Table 3.4-11. If any component is not subject to an AMR, provide a justification for its exclusion.

a. Piping (M-264 Sh. 1 @ G3 through G7 for 10 inch and 12-inch diameter piping)

b. Piping reducers (M-264, Sh. 1 @ D5, D6, G3, G4 and G7)

c. Piping rectangular to round transition (M-264, Sh. 1 @ D5 and D6)

d. Pitot tube connections plugged (M-264, Sh. 1 @ B4, B7, D4, D7, F4 and F7)

e. Bird screen or wire mesh, if provided as a protective cover, for an exhaust stack (M-264, Sh. 1 @ G5)

2.3.3.11-2 Clarify the following component commodity grouping categories as stated in Table 3.4-1:

a. Does the “filter” commodity group include the filter housings, prefilters, absolute (high efficiency particulate air (HEPA)) filters and charcoal adsorbers (as shown in P&ID M-264)?

b. Does the “blower” commodity group include the exhaust fans (VEF 38A/B) and fan housings, as stated in the text of LRA Section 2.3.3.11 and shown in P&ID M-264, Sheet 1?

2.3.3.12 AUXILIARY BUILDING HEATING AND VENTILATION SYSTEM (ABHVS)

2.3.3.12-1 Several components on P&IDs M-262 Sheets 1, 2, 3 and four, M-263 Sheets 2 and 3, and in the text of LRA Section 2.3.3.12 are identified as being within the scope of license renewal are not included in Table 3.4-12. Table 3.4-12 lists the components subject to an AMR for the ABHVS. Identify whether the following components are subject to an AMR, and if so, provide the relevant information about the components to complete Table 3.4-12. If any component is not subject to an AMR, provide a justification for its exclusion.

a. Damper bodies, blower housings, and cooler housings (Section 2.3.3.12, Para. 2)

b. Auxiliary building electrical room unit coolers (Section 2.3.3.12, Para. 3)

c. Fan coil unit housings and filters for fan coil units VUC-1A/B/C/D (M-262, Sh. 4 @ E7, E6, C/D4-C/D5, and C/D3)

d. Fan coil unit housings and filters for fan coil units VUC-14A/C/D and VUC-2D/B (M-263, Sh. 2 @ D5, F4, F2, and C/B2)

e. Diesel generator exhaust fan housings for exhaust fans VEF 24A/B/C/D (M-263, Sh. 2 @ A5-A8)

f. Fan coil unit housings and filters for fan coil unit VUC 14B (M-263, Sh. 3 @ A8)

g. Valve bodies for solenoid valves 2107, 2108, 2111, 2112, and 2116 (M-262, Sh. 1 @ B3, B4, B7, and B8)

h. Valve bodies for solenoid valves 2100, 2101, 2102, 2114, and 2115 (M-262, Sh. 2 @ E7, F7, G6, and H6)

i. Valve bodies for solenoid valves 2103, 2104, 2105, 2106, and 2113 (M-262, Sh. 3 @ D6, and C6)

j. Valve bodies for control valve 1621, 1622, 1635, 1636, and 1638 (M-262, Sh. 4 @ D6, D5, F5, and F4)

2.3.3.12-2 The fuel handling accident is evaluated in updated final safety analysis report (UFSAR) Section 14.2.2.3. UFSAR Section 14.2.2.3.4, "Results of Analysis," states that "The fuel handling building is ventilated, and discharge is through charcoal filters to the unit vent. . . . Dose conversion factors consistent with ICRP 30 were utilized." Based on the above, it seems that the ABHVS is credited in mitigating the fuel handling accident. However, P&ID M-262, Sheet 1 and Table 3.4-12 exclude the fuel handling floor exhaust filtration system components from the scope of components subject to an AMR. Provide a justification for the exclusion or provide the relevant information about the fuel handling floor exhaust filtration system components (exhaust fans (VEF14A/B), exhaust filters (VFC-1/VFA-1/VFP-8), flow element (FE8002), control valves (CV7605/7606), associated ductwork, and flue) to complete Table 3.4-12.

2.3.3.12-3 LRA Section 2.3.3.12 states that some of the fire dampers in the ABHVS also have the function of closing in the unlikely event of a fire to meet 10CFR50.48 requirements. However, the fire dampers on P&IDs M-262, Sheets 1 through 4, M-263, Sheets 2 and 3, and in Table 3.4-12 are not identified as being within the scope of components subject to an AMR. Provide justification for the exclusion of the fire dampers from an AMR or provide the relevant information about its components to complete Table 3.4-12.

2.3.3.12-4 Sealant materials are not identified as being within the scope of components subject to an AMR and are not included in Table 3.4-12. Provide justification for the exclusion of the sealant materials or provide the relevant information about the sealants to complete Table 3.4-12.

2.3.3.12-5 Identify whether the following components are subject to an AMR, and if so, provide the relevant information about the components to complete Table 3.4-12. If a component is not considered subject to an AMR, provide a justification for its exclusion:

a. Air bottles

- VRA 5, 6, and 8 (M-262, Sh. 1 @ B3, B/C7, B/C8)
- VRA 2 and 7 (M-262, Sh. 2 @ E3 and G7)
- VRA 3 and 4 (M-262, Sh. 3 @ D6 and B/C6)

b. Exhaust ductworks

- North electrical penetration room ductwork (M-262, Sh. 1 @A8)
- South piping penetration room and South electrical penetration room ductwork (M-262, Sh. 2 @ C2-G2)
- Electrical equipment room and electrical penetration room ductwork (M-262, Sh. 2 @ G7-G8)
- North piping penetration room ductwork (M-262, Sh. 2 @ D8-F8)

c. Fan coil units

- VUC-6 (M-262, Sh. 3 @ B2-B3) for emergency feedwater pump room
- VUC-4A/B (M-263, Sh. 2 @ H7, G7) for relay room
- VUC-3 (M-263, Sh. 2 @. E7-E8) for cable spreading room
- VUC-13A (M-263, Sh. 2 @ C -D4) and VUC-13B (M-263, Sh. 2 @ E5) with condenser units VE-1A/B (M-263, Sh. 2 @ H4, H5/6) for north/south charger rooms
- VUC-2A (M-263, Sh. 2 @ F1) and VUC-2C (M-263, Sh. 2 @ F3) for north and south electrical switchgear rooms
- VUC-11 (M-263, Sh. 2 @ D2) and condenser unit VE-2 (M-263, Sh. 2 @ D1) for south electrical equipment room
- VUE 32/33/34/35 (M-263, Sh. 2 @ C5-C8) for diesel generator rooms K4 A/B

d. Exhaust Filtration units and vent with associated ductwork and fire dampers

- VEF8A/B (M-262, Sh. 1 @ F/G7-F/G8)
- VEF 33 (M-263, Sh. 2 @ C3) for south battery and charger rooms
- VEF 34 (M-263, Sh. 2 @ E7) for north battery and charger rooms
- Vent VPH-6 (M-263, Sh. 2 @ H8)

e. Flow element and control valves

- Flow element FEB001 (M-262, Sh. 1 @ H7)
- Valve bodies for control valves CV7603/7604 (M-262, Sh. 1 @ G7)

2.3.3.13 CONTROL ROOM VENTILATION SYSTEM (CRVS)

2.3.3.13-1 Several components identified to be within the scope of license renewal on P&IDs —263 Sheet 1 and in the text of LAR Section 2.3.3.13 are not included in Table 3.4-13. Table 3.4-13 lists the components subject to an AMR for the CRVS. Identify whether the following components are subject to an AMR, and if so, provide the relevant information about the components to complete Table 3.4-13. If a component is not considered subject to an AMR, provide a justification for its exclusion.

a. Damper bodies, blower housings, and cooler housings (text of Section 2.3.3.13, Para. 2)

b. Control room emergency unit coolers (text of Section 2.3.3.13, Para. 3)

c. Electrical equipment room 2150 emergency cooling units ((to maintain the Freon pressure boundary) (text of Section 2.3.3.13, Para. 3))

a. Filtration unit housings for emergency filter and fan units VSF-9 (M-263, Sh. 1 @ E4/5), 2VSF-9 (M-263 Sh. 1 @ A7-A8), and outside air emergency filter unit housing ((M-263, Sh. 1 @ F4/5)

b. Valve bodies for control valves CV-7905 (M-263 Sh. 1 @ E6), CV-7907 (M-263, Sh. 1 @ G6), and CV-7910 (M-263, Sh. 1 @ F5)

c. Air operated dampers and its operators 2PCD-8607 (M-263, Sh. 1 @ B8), 2UCD-8609 (M-263 Sh. 1 @ A7), 2PCD-8685 (M-263, Sh. 1 @ C3), and 2UCD-8683 (M-263, Sh. 1 @ C3)

d. Air handling unit housings, and heating and cooling coils for 2 VUC-27A/B (M-263, Sh. 1 @ F3, E3)

2.3.3.13-2 Describe the areas that constitute the main control room envelope (MCRE) for ANO 1. Verify that all CRVS components (including air handling units and fan coil units with their associated ductwork, fire damper and control valves, air intake, and exhaust fan with purge ductwork) inside MCRE, which are relied on to perform the safety-related cooling and filtration functions (in order to maintain the control room habitability (CRH) and the CLB, are identified to be within the scope of LRA and subject to an AMR, on M-263, Sheet 1 and in Table 3.4-13. If any component is not considered subject to an AMR, provide a justification for its exclusion.

2.3.3.13-3 Clarify whether sealants used to maintain the MCRE at positive pressure with respect to the adjacent areas in order to prevent the unfiltered inleakages inside MCRE are included in the scope of LR and subject to AMR, and if so, provide the relevant information to complete Table 3.4-12. If the sealants are not considered subject to an AMR, provide a justification for their exclusion.

2.3.3.13-4 The design-basis function of radiation and chlorine monitors is stated in UFSAR Section 9.7.2.1 as follows: "The control room is continuously monitored with alarms for high radiation. The control room inlet air radiation monitor consists of an auto digital ratemeter, preamplifier, and Beta-Gamma sensitive scintillation detector. . . . A high alarm causes isolation of the control room. . . . Redundant quick acting chlorine detectors are presently in place in the control room fresh air inlets which institute closing of the isolation dampers upon attaining 5 ppm Cl_2 levels in the incoming air. . . ." However, the radiation monitor and chlorine detectors are neither shown and identified on the P&ID M-263, Sheet 1 and Table 3.4-13 nor listed in LRA, Section 2.3.3.13, as in scope of LR and subject to an AMR. Provide the relevant information about the radiation and chlorine monitors to complete Table 3.4-13. If the monitors are not subject to an AMR, provide a justification for its exclusion.

2.4 STRUCTURAL SCREENING RESULTS

2.4-1 Section 2.4.1 of the LRA states that many components are not typically associated with unique equipment identifiers and are not individually identified during the identification of components. Provide examples of some of these types of components within the reactor building internals. Provide a discussion as to how these components will be included within the scope of license renewal, and how the applicable components will be subject to an AMR and maintained during the period of extended operation.

2.4-2 Section 2.4.2 of the LRA states that the reactor building internals consist of the reactor cavity, two steam generator compartments, and a fuel transfer canal. Provide a justification as to why the in-core instrumentation cavity and the reactor building sump are not included in the scope of license renewal.

2.4-3 Section 2.4.2.1 of the LRA states that the steel also provides support for several nuclear safety-related components, including core flood tanks, reactor building cooling units, emergency core cooling system piping, and instrumentation, control, and power. However, the support steel for the coolant pumps is not listed in Table 3.6-3 of the LRA. Verify whether the lateral support steel that holds the snubbers or turnbuckles for the steam generators and coolant pumps should be included in the list of components subject to an AMR (in Table 3.6-2 of the LRA as the components of the reactor building internals, or in Table 3.6-8 of the LRA as the bulk commodities), or provide a justification for not requiring an AMR.

2.4-4 As stated in Section 2.4.3 of the LRA, one of the intended functions of the auxiliary building and its structural components is to serve as missile barriers. Table 3.6-4 listed only missile shield doors and walls. Are there any missile protective devices for internal missiles such as the barriers for protecting safety-related systems, structures, and components (SSCs) from pipe whipping or jet forces due to main stream line or feedwater line breaks or pressure relief valve failures. If so, provide an AMR, or a justification for excluding these components from an AMR.

2.4-5 Section 2.4.3 of the LRA states that the turbine building itself is not within the scope of license renewal, some fire doors, fire walls, and slab within the turbine building are in scope and subject to an AMR. These components are addressed along with those for the auxiliary building. However, these in-scope components in the turbine building provide a rated fire barrier to confine a fire from spreading to adjacent areas of the plant. The turbine building must be added to the scope of license renewal because it contains components that were subject to an AMR. In addition, turbine buildings typically provide shelter, protection, and support to safety-related piping or cables routed through the turbine building. Please verify that the turbine building does not contain any safety-related piping or cabling, and if so, identify the safety-related components or equipment in the turbine building, and the applicable turbine building structures and components that provide shelter, support, or protection.

2.4-6 Section 2.4.3 of the LRA states that for the material group elastomers, none of the components or unique commodities are subject to an AMR and there are no components or unique commodities associated with the material groups earthen structures or Teflon. However, some of the components or commodities associated with the elastomers or Teflon group in the auxiliary building are listed in Table 3.6-8 of the LRA as the bulk commodities that are subject to an AMR. Provide an explanation for these differences and verify that the earthen structures have no components or commodities subject to an AMR.

2.4-7 Section 2.4.4 of the LRA states that Category 2 structures in the intake structure are not within the scope of 10 CFR 54.4(a)(2). These structures typically provide functional support to non-safety-related equipment whose failure could prevent satisfactory accomplishment of safety-related functions. Provide a discussion that verifies and explains why the Category 2 structures are not required to meet the intent of 10 CFR 54.4(a)(2).

2.4-8 Table 3.3-6 of the LRA listed the emergency cooling pond, intake canal, and discharge canal as the components of the earthen embankments that are subject to an AMR. These are natural soil embankment constructions. Explain why structures associated with these embankments, such as the spillway, weir, canal inlet, and outlet structures, are not (listed in the table) subject to AMR for license renewal.

2.4-9 Section 2.4.6.1 of the LRA describes the aboveground and underground yard structures and trenches. However, there is no supporting information or

document that can be used to verify the content of this section. Provide a drawing or sketch that shows the location of the yard structures and trenches and highlights the components that are within the scope of license renewal (send a site plan similar to the site plan, drawing No. OLR-1, of the Oconee LRA).

3.3.7 Electrical Instrumentation and Controls

3.3.7.3.4.1-1: On October 2, 1999, the #2 component cooling water (CCW) pump tripped at the Davis-Besse Nuclear Power Station. The supply breaker tripped as a result of a phase-to-ground fault in a 3-phase safety-related Okonite cable. The cable consisted of three twisted 2/0 single conductors insulated with ethylene-propylene-rubber (EPR) with a bare #4 copper ground. The cable was installed in a 4-inch pvc conduit that runs partially underground from the switchgear room in the turbine building to the CCW pump room, and had been in service for about 23 years. Although a conclusive root cause has not been determined, it appears that the most likely aging degradation mechanism is intrusion of ground water into the cable over a period of time. Although the cable is water resistant, it is not water proof, and over time water can permeate through the EPR insulation by the process of osmosis. The NRC is interested in this cable failure because there are potential generic implications for cable failures caused by aging at other nuclear power plants. Provide a discussion relative to the applicability of this event to cables at ANO-1 and if appropriate, provide a discussion on how the aging of similar cables will be managed during the period of extended operation.

Arkansas Nuclear One
Docket No. 50-313

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