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November 16, 1999

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DOCKET NUMBER
PETITION RULE PRM 51-7
(64FR48117)

Ms. Annette Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Arkansas Nuclear One - Unit 1
Docket No. 50-313
License No. DPR-51
SAMA Petition for Rulemaking

Gentlemen:

The Nuclear Energy Institute (NEI) has petitioned the NRC to amend 10CFR Part 51 in order to eliminate the requirement to assess Severe Accident Mitigation Alternatives (SAMAs) as a part of the environmental review for license renewal. The NRC published a notice of receipt of the NEI petition and requested comments by November 16, 1999 (64 Federal Register 48117, dated September 2, 1999). Entergy Operations has recently performed a SAMA evaluation in support of the environmental review for the Arkansas Nuclear One, Unit 1 (ANO-1) License Renewal Application (LRA). Preliminary results indicate that there is only one cost-beneficial SAMA, and it is not age-related. Although the processes established for the evaluation of plant changes are expected to be beneficial, the insights provided by this review, with respect to license renewal, do not justify the cost involved.

Although the timing of this rulemaking will not benefit the ANO-1 LRA submittal, elimination of the requirement to perform the SAMA review as a part of the license renewal process could be very beneficial to other licensees considering license renewal. Therefore, Entergy Operations endorses the comments being submitted by NEI and would also like to recommend that the Commission approve the NEI petition. Should you have any questions, please contact me.

Very truly yours,

Jimmy D. Vandergriff
Director, Nuclear Safety

JDV/nbm

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