



Entergy Operations, Inc.

1448 S.R. 333  
Russellville, AR 72801  
Tel 501-858-4688

Craig Anderson

Vice President  
Operations ANO

September 14, 2001

1CAN090103

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Mail Station OP1-17  
Washington, DC 20555

Subject: Arkansas Nuclear One - Unit 1  
Docket No. 50-313  
License No. DPR-51  
Arkansas Nuclear One - Unit 1 – Operating License Conditions Relating to the  
Conversion to Improved Technical Specifications (TAC No. MA8082)

Gentlemen:

By letter dated January 28, 2000 (1CAN010007), Entergy Operations submitted a license amendment request to convert the Arkansas Nuclear One - Unit 1 (ANO-1) current Technical Specifications to an improved Technical Specification (ITS) format similar to NUREG-1430, "Standard Technical Specifications - Babcock & Wilcox Plants," Revision 1, dated April 1995. Supplemental letters dated September 28, 2000, February 6, 2001, March 19, 2001, May 3, 2001, and August 23, 2001, included responses to questions presented by the NRC Staff, with subsequent revisions to the original ITS submittal, along with necessary changes identified by ANO personnel. Based on recent conversation with the NRC Staff, NRC approval of the ANO-1 conversion to ITS is expected in the near future.

In light of the expected NRC approval of the ANO-1 conversion to ITS, ANO-1 proposes the attached license conditions to be incorporated into the unit's Operating License. These conditions will require proper and timely implementation of the new ITS following NRC approval. The conditions provide guidance relating to the implementation of Surveillance Requirements (SR) where, as a result of conversion to ITS, new SRs have been created, SR acceptance criteria has been revised, or SR performance intervals have changed. Additionally, a license condition is included to ensure that information approved by the NRC to be removed from the Technical Specifications and placed in other licensee-controlled documents or programs is accomplished in a timely manner. Currently, the conversion to ITS is scheduled for implementation in the 2nd quarter of 2002.

ANO-1 previously submitted changes to the current Operating License (reference August 23, 2001 submittal) affecting certain license conditions that are proposed for relocation to Section 5.0, Administrative Controls, of the ITS. These changes resulted in the relocation of license conditions 2.c(5), 2.c(6), and 2.c(7). The proposed license conditions discussed above are, therefore, inserted in place of the relocated 2.c(5) requirements. The attached Operating

License pages are intended to replace those previously submitted. No technical change relating to the aforementioned relocations has been made. The following page (Operating License page 5) is re-submitted due to the formatting effects resulting from the addition of the above license conditions to the Operating License.

The license conditions proposed in this submittal are considered new commitments intended to support ANO-1 ITS implementation. Due to the significant coordination and scope involved with the implementation of ITS, Entergy requests the date for ITS implementation be one year from the effective date.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 14, 2001.

Very truly yours,

A handwritten signature in black ink, appearing to read "Craig M. [unclear]". The signature is written in a cursive style with a large initial "C" and a long horizontal stroke at the end.

CGA/dbb  
Attachments

cc: Mr. Ellis W. Merschoff  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

NRC Senior Resident Inspector  
Arkansas Nuclear One  
P.O. Box 310  
London, AR 72847

Mr. William Reckley (2 copies)  
NRR Project Manager Region IV/ANO-1  
U. S. Nuclear Regulatory Commission  
NRR Mail Stop O-7 D1  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

Mr. David D. Snellings  
Director, Division of Radiation  
Control and Emergency Management  
Arkansas Department of Health  
4815 West Markham Street  
Little Rock, AR 72205

**ATTACHMENT 1**

**to**

**1CAN090103**

**PROPOSED OPERATING LICENSE CHANGES**

**RELATING TO ANO-1**

**ITS IMPLEMENTATION**

and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plan, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Arkansas Nuclear One Industrial Security Plan," with revisions submitted through August 2, 1995. The Industrial Security Plan also includes the requirements for guard training and qualification in Appendix A and the safeguards contingency events in Chapter 7. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

(5) Implementation of the Improved Technical Specifications (ITS)

The licensee is authorized to relocate certain Technical Specification requirements previously included in Appendix A to licensee controlled documents, as described in Table R, Relocated Specifications, and Table LA, Removal of Details, attached to the Safety Evaluation dated September 28, 2001 (Amendment No. 215). These requirements shall be relocated to the appropriate documents as part of the implementation of the ITS.

The schedule for performing Surveillance Requirements (SRs) that are new or revised in Amendment No. 215 shall be as follows:

1. For SRs that are new in this amendment, the first performance shall be due at the end of the first surveillance interval that begins on the date of implementation of this amendment.
2. For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval shall begin upon completion of the first surveillance performed after implementation of this amendment.
3. For SRs that existed prior to this amendment that contained modified acceptance criteria, the first performance shall be due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.
4. For SRs that existed prior to this amendment whose interval of performance are being extended, the first extended surveillance interval shall begin upon completion of the last surveillance performed prior to the implementation of this amendment.

(6) Deleted

(7) Deleted

(8) Fire Protection

EOI shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in Appendix 9A to the SAR and as approved in the Safety Evaluation dated March 31, 1992, subject to the following provision:

1. AP&L<sup>1</sup> may proceed with and is required to complete the modifications identified in Paragraphs 3.1 through 3.19 of the NRC's Fire Protection Safety Evaluation on the facility dated August 22, 1978 and supplements thereto. These modifications shall be completed as specified in Table 3.1 of the Safety Evaluation Report or supplements thereto. In addition, the licensee may proceed with and is required to complete the modifications identified in Supplement 1 to the Fire Protection Safety Evaluation Report, and any future supplements. These modifications shall be completed by the dates identified in the supplement.
2. The licensee may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.
3. This renewed license is effective as of the date of issuance and shall expire at midnight, May 20, 2034.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed by:  
Jon R. Johnson

Jon R. Johnson, Acting Director  
Office of Nuclear Reactor Regulation

Attachment:

Appendix A - Technical Specifications and  
Technical Specification Bases (ML011710071 and ML011710100)

Date of Issuance: June 20, 2001

---

<sup>1</sup> The Original licensee authorized to possess, use, and operate the facility was AP&L. Consequently, certain historical references to AP&L remain in the license conditions.

**ATTACHMENT 2**

**to**

**1CAN090103**

**MARKUPS OF THE**

**PROPOSED OPERATING LICENSE CHANGES**

**(FOR INFORMATION ONLY)**

and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plan, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Arkansas Nuclear One Industrial Security Plan," with revisions submitted through August 2, 1995. The Industrial Security Plan also includes the requirements for guard training and qualification in Appendix A and the safeguards contingency events in Chapter 7. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

(5) Implementation of the Improved Technical Specifications (ITS)

The licensee is authorized to relocate certain Technical Specification requirements previously included in Appendix A to licensee controlled documents, as described in Table R, Relocated Specifications, and Table LA, Removal of Details, attached to the Safety Evaluation dated September 28, 2001 (Amendment No. 215). These requirements shall be relocated to the appropriate documents as part of the implementation of the ITS.

The schedule for performing Surveillance Requirements (SRs) that are new or revised in Amendment No. 215 shall be as follows:

1. For SRs that are new in this amendment, the first performance shall be due at the end of the first surveillance interval that begins on the date of implementation of this amendment.
2. For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval shall begin upon completion of the first surveillance performed after implementation of this amendment.
3. For SRs that existed prior to this amendment that contained modified acceptance criteria, the first performance shall be due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.
4. For SRs that existed prior to this amendment whose interval of performance are being extended, the first extended surveillance interval shall begin upon completion of the last surveillance performed prior to the implementation of this amendment.

Systems Integrity

~~EOI shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a~~

~~serious transient or accident to as low as practical levels. This program shall include the following:~~

- ~~1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and~~
- ~~2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.~~

(6) Iodine Monitoring

~~EOI shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:~~

- ~~1. Training of personnel,~~
- ~~2. Procedures for monitoring, and~~
- ~~3. Provisions for maintenance of sampling and analysis~~

~~equipment.~~Deleted

(7) Secondary Water Chemistry Monitoring

~~A secondary water chemistry monitoring program shall be implemented to minimize steam generator tube degradation. This program shall include:~~

- ~~1. Identification of a sampling schedule for the critical parameters and control points for these parameters;~~Deleted

- ~~2. Identification of the procedures used to measure the values of the critical parameters;~~
- ~~3. Identification of process sampling points;~~
- ~~4. Procedures for the recording and management of data;~~
- ~~5. Procedures defining corrective actions for off-control point chemistry conditions; and~~
- ~~6. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events required to initiate a corrective action.~~

(8) Fire Protection

EOI shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in Appendix 9A to the SAR and as approved in the Safety Evaluation dated March 31, 1992, subject to the following provision:

1. AP&L <sup>2</sup> may proceed with and is required to complete the modifications identified in Paragraphs 3.1 through 3.19 of the NRC's Fire Protection Safety Evaluation on the facility dated August 22, 1978 and supplements thereto. These modifications shall be completed as specified in Table 3.1 of the Safety Evaluation Report or supplements thereto. In addition, the licensee may proceed with and is required to complete the modifications identified in Supplement 1 to the Fire Protection Safety Evaluation Report, and any future supplements. These modifications shall be completed by the dates identified in the supplement.
2. The licensee may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

---

<sup>2</sup> The Original licensee authorized to possess, use, and operate the facility was AP&L. Consequently, certain historical references to AP&L remain in the license conditions.

3. ~~This renewed license is effective as of the date of issuance and shall expire at midnight, May 20, 2034.~~

~~FOR THE NUCLEAR REGULATORY COMMISSION~~

~~Original Signed by:  
Jon R. Johnson~~

~~Jon R. Johnson, Acting Director  
Office of Nuclear Reactor Regulation~~

~~Attachment:~~

~~Appendix A — Technical Specifications and  
Technical Specification Bases (ML011710071 and ML011710100)~~

~~Date of Issuance: June 20, 2001~~

Moved to previous page.