October 15, 2001

Mr. Craig G. Anderson
Vice President, Operations ANO
Entergy Operations, Inc.
1448 S. R. 333
Russellville, AR 72801

SUBJECT: ARKANSAS NUCLEAR ONE, UNIT NO. 2 - ISSUANCE OF AMENDMENT RE: ONE-TIME ALLOWED OUTAGE TIME EXTENSION FOR THE EMERGENCY DIESEL GENERATOR (TAC NO. MB2226)

Dear Mr. Anderson:

The Commission has issued the enclosed Amendment No. 234 to Facility Operating License No. NPF-6 for Arkansas Nuclear One, Unit No. 2 (ANO-2). This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated June 12, 2001, as supplemented by letters dated July 31, September 19 and September 25, 2001.

The amendment revises TS 3.8.1.1 to provide a one-time extension of the allowed outage time (AOT) for an inoperable emergency diesel generator (EDG) from three days to ten days. In addition, the amendment revises TS 3.4.4 to make the action associated with an inoperable emergency power supply to the pressurizer heaters consistent with the proposed EDG AOT.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

Thomas W. Alexion, Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-368

Enclosures:
1. Amendment No. 234 to NPF-6
2. Safety Evaluation

cc w/encls: See next page

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ENTERGY OPERATIONS, INC.

DOCKET NO. 50-368

ARKANSAS NUCLEAR ONE, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 234
License No. NPF-6

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Entergy Operations, Inc. (the licensee), dated June 12, 2001, as supplemented by letters dated July 31, September 19 and September 25, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-6 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 234, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Robert A. Gramm, Chief, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: October 15, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 234

FACILITY OPERATING LICENSE NO. NPF-6

DOCKET NO. 50-368

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
3/4 4-5	3/4 4-5
3/4 8-1	3/4 8-1
3/4 8-2	3/4 8-2
B 3/4 0-1c	B 3/4 0-1c

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 234 TO

FACILITY OPERATING LICENSE NO. NPF-6

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT NO. 2

DOCKET NO. 50-368

1.0 INTRODUCTION

By letter dated June 12, 2001, as supplemented by letters dated July 31, September 19 and September 25, 2001, Entergy Operations, Inc. (Entergy or the licensee), submitted a request for changes to the Arkansas Nuclear One, Unit No. 2 (ANO-2), Technical Specifications (TSs). The requested changes would revise TS 3.8.1.1 to provide a one-time extension of the allowed outage time (AOT) for an inoperable emergency diesel generator (EDG) from three days to ten days. In addition, the amendment would revise TS 3.4.4 to make the action associated with an inoperable emergency power supply to the pressurizer heaters consistent with the proposed EDG AOT.

The July 31, September 19 and September 25, 2001, supplemental letters provided clarifying information and revised TSs that did not change the scope of the original *Federal Register* notice (66 FR 36341, July 11, 2001) or the initial no significant hazards consideration determination.

2.0 BACKGROUND

The proposed change to the EDG TSs will revise the current 72-hour AOT specified in Limiting Condition for Operation (LCO) 3.8.1.1, Action ‘b,’ to allow a one-time AOT extension to 10 days to restore an inoperable EDG to operable status. The purpose of this proposed change is to provide the licensee with needed flexibility in performing maintenance during power operation. LCO 3.8.1.1 Actions ‘c' and ‘e’ are also revised as a result of the proposed change to Action ‘b.’ Also included is a re-formatting of the Action Statements of TS 3.8.1.1 to address human factors concerns. In addition, the AOT for the emergency power supply to the pressurizer heaters in LCO 3.4.4(b) is revised to be consistent with the above. The proposed AOT is based on the findings of deterministic and probabilistic risk assessment (PRA) evaluations.

3.0 DISCUSSION

ANO-2 is equipped with seismically qualified, Class 1E EDGs that supply backup electrical power to the 4160 volt (V) engineered safety features (ESFs) alternating current (AC) buses. Each engine is designed to automatically start and tie-on to its respective 4160 V ESF bus in the event of a bus under-voltage condition on either the 4160 V bus or 480 V motor control center. The EDGs also receive an auto start command on a safety injection actuation signal, but will not load unless a bus under-voltage condition exists.

Each EDG starts automatically upon receipt of a start demand and attains rated speed and voltage within 15 seconds, and sequentially accepts ESF loads. Each EDG is sized to accommodate loading of all anticipated ESF actuated equipment with a continuous load rating of 2850 kilowatts (kW) and a 7-day rating of 3250 kW. Under procedurally controlled conditions, the EDGs may be aligned to supply the adjacent ESF bus via cross-tie breakers.

The current EDG reliability is 0.98 with a site goal of 0.95. The 0.98 reliability value is based on the last 100 starts and load runs.

In addition to the EDGs, ANO-2 has installed an alternate AC (AAC) source pursuant to the requirements of 10 CFR 50.63, “Loss of all alternating current power.” The AAC source is a diesel generator rated at 4400 kW continuous output and 5320 kW overload. The AAC diesel generator (AACDG) is capable of supplying 4160 V power to Arkansas Nuclear One, Unit 1 (ANO-1), vital buses A3 or A4, or ANO-2 vital buses 2A3 or 2A4. The design consideration for the AACDG assumed it would be started from the control room and available to power the vital buses within 10 minutes of the diagnosis of a station blackout (SBO) condition.

The AACDG is completely independent from offsite power and the EDGs, with the exception of the bulk fuel oil storage system. The AACDG, all support systems, and attendant electrical buses are housed in a dedicated building located outside the power block, inside the protected area fence.

The AACDG is manually started and loaded. Operation and loading of the AACDG can be performed from the ANO-2 control room or locally. The reliability of the AACDG is based on its total run history, 99 starts and 58 load runs. Presently, the AACDG has proven to have a reliability factor of 0.97. The Arkansas Nuclear One (ANO) goal is 0.95.

4.0 PROPOSED CHANGE

LCO 3.8.1.1, Action ’b,’ currently requires that if one of the EDGs becomes inoperable, the inoperable EDG be restored to operable status within 72-hours. If the EDG can not be restored to an operable status within 72 hours, the TS Actions require that the plant be placed in hot standby within the following six hours and in cold shutdown within the following 30 hours. The licensee has proposed to allow a one-time AOT extension for each EDG from the current 72 hours to 10 days based on the availability of the AACDG. If the AACDG becomes unavailable during the extended AOT, the AOT will revert to the present 72 hours. If the AACDG becomes available again, the 10-day AOT will be re-entered with a start time of the original time it was entered for the EDG outage. LCO 3.8.1.1, Actions ‘c’ and ‘e’ are also revised as a result of the proposed change to Action ‘b.’ Also included is a re-formatting of the

action statements of TS 3.8.1.1 to address human factors concerns. In addition, LCO 3.4.4(b), on the AOT for the emergency power supply to the pressurizer proportional heater groups, is revised to be consistent with the change to LCO 3.8.1.1, Action 'b,' discussed above.

5.0 DETERMINISTIC EVALUATION

The staff has evaluated the licensee's proposed amendment to ANO-2 TSs using both deterministic analysis and PRA methods. This section provides the staff's deterministic evaluation.

The purpose of the proposed change to TS 3.8.1.1, Action 'b,' to extend the EDG AOT from the current 72 hours to 10 days, on a one-time basis, is to allow the licensee to perform selective corrective and preventative maintenance activities on-line and to provide the licensee with increased flexibility in the scheduling of preventative maintenance. The licensee states that the proposed change would also reduce the number of individual entries into LCO action statements by providing sufficient time to perform related maintenance within a single entry.

ANO-2 has an AACDG available as a backup to the EDGs. The AACDG source can be available within 10 minutes of the diagnosis of the SBO event. Therefore, in the event of a loss-of-offsite power (LOOP) and failure of the operable EDG during the extended AOT, power will be supplied from the AACDG to ANO-2 vital buses 2A3 or 2A4. The AACDG is tested periodically to ensure that power supply is available upon demand. It will be treated as a backup to the inoperable EDG and as a protected train component.

Further, in the event an EDG is inoperable, TS 3.0.5 requires that within two hours, all of its redundant systems, subsystems, trains, components and devices that depend on the remaining operable EDG as a source of emergency power are verified operable. This required action provides assurance that a LOOP event will not result in a complete loss of safety function of critical systems during the period that one of the EDGs is inoperable.

Since the extension of the EDG AOT is based on the finding of a deterministic and probabilistic safety analysis, entry into this action requires that a risk assessment be performed in accordance with the licensee's Risk Management Program (RMP). The above ensures that a proceduralized PRA-informed process is in place that assesses the overall impact of plant maintenance on plant risk prior to entering the LCO Action statement for planned activities.

Additionally, the licensee will take the following compensatory measures during the extended EDG AOT:

1) The system dispatcher will be contacted once per day and informed of the EDG status along with the power needs of the facility.

2) No maintenance will be planned on EDGs when adverse weather conditions are expected.

3) The steam-driven emergency feedwater pump will be controlled as "Protected Equipment."

4) No discretionary switchyard maintenance will be allowed. In addition, no discretionary maintenance will be allowed on the main, auxiliary, or startup transformer associated with the unit.

5) The AACDG will be verified available once per 8 hours during the extended EDG outage.

6) Maintenance activities on the ANO-1 EDGs will not be scheduled simultaneously with maintenance activities on an ANO-2 EDG.

7) No maintenance or testing that affects reliability of the ANO-2 train associated with the operable EDG will be scheduled during the extended EDG AOT.

With regard to the proposed AOT TS change to the emergency power supply to the pressurizer proportional heater groups, the staff finds that it is consistent with the proposed change to the EDG AOT. During the AOT, the AACDG will be maintained available, which will allow power to be supplied to the proportional heaters in the event of a LOOP. Should the AACDG become unavailable, the pressurizer proportional heater AOT will be reduced to the original 72-hour AOT, with the time starting when the AACDG becomes unavailable. Therefore, this proposed change is acceptable.

Deterministic Conclusion

The staff concludes that a one-time extension of AOT for an inoperable EDG from the current 72 hours to a 10-day period would not have an unacceptable effect on the overall safety of the plant. Our conclusion was based on the following: (1) the longer AOT would reduce the entries into the LCO and reduce the number of EDG starts for major EDG maintenance activities, (2) the availability of an AACDG which is capable of powering an ANO-2 safety bus in the event of a SBO, and (3) implementation of the RMP during the extended outage. Further, we believe that the compensatory measures taken by the licensee will minimize the occurrence of SBO during the extended AOT. Therefore, the proposed changes are acceptable.

6.0 PRA EVALUATION

AACDG

ANO-2 has an AACDG available as a backup to the EDGs. The licensee states that they are committed to ensuring the AACDG remains available and protected for the duration of the EDG AOT to effectively reduce the associated risks. Extra precautions in the form of compensatory measures have been identified to protect sources of power to the extent practical and precautions are taken with regard to the steam-driven emergency feedwater pump.

The AACDG is tested periodically in accordance with station procedures to ensure that the AACDG is available upon demand. A quarterly test is performed that ensures that the AACDG starts up on demand, ramps at a designated kW/second, synchronizes to station loads and carries the required bus loads. In addition, AACDG vibration data is taken and auxiliary systems are checked. During the 18-month test, the AACDG is also tested to ensure that it meets its required 10-minute timing from start to its loaded condition.

The following precautions should further reduce the risk during the AOT extension:

1) The AACDG will be verified available once per 8 hours while the EDG is out of service (OOS). This is consistent with the TS requirement to verify the off-site power sources are operable. In addition, quarterly surveillance testing of the AACDG will be verified satisfactorily completed within its scheduled frequency. The quarterly test includes connecting the AACDG to the in-house power system.

2) The AACDG will be treated as a backup to the inoperable EDG and as a protected train component. The AACDG and the operable EDG will be posted and controlled as “Protected Equipment.”

3) Operations personnel on ANO-1 will be notified of the EDG maintenance and the dedication of the AACDG to ANO-2.

4) The AACDG will not be used for non-safety functions (i.e., power peaking to the grid).

5) No discretionary switchyard maintenance will be allowed. In addition, no discretionary maintenance will be allowed on the main, auxiliary, or startup transformers associated with the unit. Both the transformers and the switchyard remain posted year-round, preventing unauthorized access. This exclusion does not apply to non-intrusive routine walk-downs.

6) The system dispatcher will be contacted once per day and informed of the EDG status along with the power needs of the facility.

7) Although satisfactory grid stability is expected, should a tornado or thunderstorm warning be issued for the local area, an operator will be dispatched to the AACDG. The operator will be available should local operation of the AACDG be required as a result of on-site weather-related damage.

8) The steam-driven emergency feedwater pump will be controlled as “Protected Equipment.”

9) The ANO-2 On-Shift Operations crew will discuss and review appropriate normal and emergency operating procedures upon or prior to assuming the watch for the first time after having scheduled days off while the AOT is in effect.

10) The ANO-2 Operations crews will be briefed concerning the ANO-2 EDG activities, including compensatory measures established and the importance of promptly starting and aligning the AACDG following instruction of the ANO-2 Shift Manager upon the loss of power event. This briefing will be performed upon or prior to assuming the watch for the first time after having scheduled days off while the AOT is in effect.

11) No maintenance or testing that affects reliability of the ANO-2 train associated

with the operable EDG will be scheduled during the maintenance on the OOS EDG. Testing and maintenance of other ANO-2 safety-related components will be minimized. Testing or maintenance on the ANO-2 safety-related systems or components that must be performed while the AOT is in effect will be evaluated as required by 10 CFR 50.65(a)(4). Tests on safety-related equipment that are scheduled during the EDG maintenance window will be reviewed and the risk impact assessed prior to performance, when possible. Typically these tests will be completed prior to removing the EDG from service while maintaining the TS specified surveillance interval described in TS 4.0.2.

12) Unless sufficient evidence is discovered to indicate the potential for common cause failure of the EDG, no additional surveillance testing will be performed on the operable EDG. This reduces the risk of introducing unnecessary perturbations on safety-related equipment and is consistent with the guidance within Generic Letter 99-01.

13) Maintenance activities on the ANO-1 EDGs will typically not be scheduled simultaneously with maintenance activities on an ANO-2 EDG.

ANO-2 RMP

The RMP at ANO-2 is updated routinely for changes in physical plant parameters and due to industry insights gained over years of experience. Currently, the Equipment Out-Of-Service (EOOS) module is utilized daily by the Planning & Scheduling Liaison (a member of the Operations department maintaining a senior reactor operator license) to evaluate the risk associated with maintenance activities. In addition to the performance of a quantitative assessment by EOOS, the Planning and Scheduling Liaison performs a qualitative assessment daily. This qualitative assessment covers a broad range of areas, including trip or transient potential, reactivity mismanagement potential, redundant equipment availability, cross unit impact, red train - green train separation, fire, flooding, and severe weather contingencies.

As required by 10 CFR 50.65(a)(4), prior to performing scheduled maintenance, a thorough evaluation is performed to consider the potential risk associated with the activity. This may indicate that taking other safety system equipment OOS for maintenance would not normally be done or that increased administrative controls on other equipment should be put in place.

The current EDG AOT of 72 hours under the existing TSs does not consider an additional backup power supply to be available to mitigate a LOOP. The proposed change will ensure that an alternate onsite diesel generator will be available while the EDG is out of service. Therefore, this change can be considered to be a more responsive action than that contained in the current TSs.

PRA Quality

The ANO-2 Individual Plant Examination (IPE) model was developed by ANO Safety Analysis Design Engineering personnel with support from SAIC (now DS&S), other Design Engineering groups, and Operations. As part of the IPE development process, an expert panel review was performed on the results. This panel was composed of experienced personnel from these

groups. In addition, ERIN Engineering performed an external review of the IPE model and results.

The ANO-2 Probabilistic Safety Assessment (PSA) model has been updated several times since the IPE in an effort to maintain it consistent with the as-built/as-operated plant, to incorporate improved thermal hydraulic results, and PSA methodology improvements. The updates have involved a cooperative effort involving both Entergy personnel and PSA consultant support. In each of the updates, all of the elements of the PSA are independently reviewed and revised, as appropriate. The PSA model and results have been maintained as plant calculations or engineering reports. As part of each major update, an internal review of PSA model results is performed by utilizing a team of experts (i.e. Operations, System Engineering, Design Engineering, Safety Analysis, and PSA engineers) to ensure adequacy of the model. No owners group peer review has been conducted on the ANO-2 model to date. However, a peer review is being scheduled early in 2002.

A review of previous models and the subsequent updates indicates the results are generally consistent from model to model.

External Events

It is noted that the ANO-2 EOOS model is an “internal events” model and does not account for “external events” such as seismic events, internal fires, floods, high winds and tornadoes, as well as transportation and nearby facilities accidents. A vulnerability review of these risk contributors was performed during the ANO-2 IPE of External Events (IPEEE) process. Although the ANO-2 IPEEE analyses did not produce a quantitative estimate of the external events contribution to the ANO-2 core damage frequency (CDF), these reviews concluded that ANO-2 has a relatively low risk from external events. Since the internal events CDF is well within Nuclear Regulatory Commission (NRC or the Commission) Regulatory Guide (RG) 1.174, Figure 3, Region III, and since the external events CDF contributions were determined to be relatively low, it is concluded that the overall change in CDF due to a 10-day AOT does not contribute significantly to the ANO-2 CDF (see Quantitative Results below).

Quantitative Results

The licensee’s annual average delta CDF is 5.7E-7 and the delta large early release frequency is 1.21E-8, both within the acceptable guidelines of RG 1.174.

Using this information, the staff estimates that, for the proposed 10-day one-time EDG AOT, the Incremental Conditional Core Damage Probability (ICCDP) is 6.0 E-7. The corresponding Incremental Conditional Large Early Release Probability (ICLERP) is estimated to be 2.0E-8. The ICCDP is close to the guideline value of 5.0E-7 and the ICLERP is below the guideline value of 5.0 E-8 (in RG 1.177). Conservative corrective maintenance is assumed in these estimates.

PRA Conclusion

The staff judges that a one-time 10-day EDG AOT is justified for ANO-2 based upon the AACDG, the licensee’s RMP, and low quantitative risk estimates.

7.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Arkansas State official was notified of the proposed issuance of the amendment. The State official had no comments.

8.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (66 FR 36341, dated July 11, 2001). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with issuance of the amendment.

9.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: O. Chopra
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Date: October 15, 2001

cc:

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