



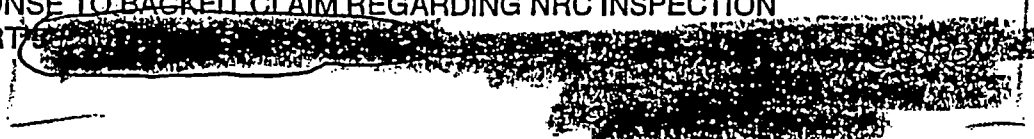
UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION IV
 611 RYAN PLAZA DRIVE, SUITE 400
 ARLINGTON, TEXAS 76011-8064

Craig G. Anderson, Vice President
 Operations
 Arkansas Nuclear One
 Entergy Operations, Inc.
 1448 S.R. 333
 Russellville, Arkansas 72801-0967

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SUBJECT: RESPONSE TO BACKFIT CLAIM REGARDING NRC INSPECTION REPORT



Dear Mr. Anderson:

As documented in NRC Inspection Report 50-313;368/01-06, dated August 20, 2001, the NRC identified an unresolved item in the Unit 1 emergency diesel generator corridor and the Unit 1 north electrical switchgear room concerning use of manual actions in lieu of providing protection for cables associated with equipment necessary for achieving and maintaining hot shutdown as specified in 10 CFR Part 50, Appendix R, Section III.G.2. This issue was considered unresolved pending further NRC review and the determination of its risk. Subsequently, in an exit meeting held on August 30, 2001, the NRC informed Entergy Operations, Inc., that the existing configurations did not conform to the requirements of 10 CFR Part 50, Appendix R, Section III.G.2. However, the issue remained unresolved pending the completion of the NRC's risk determination.

Your letter of September 28, 2001, claimed that our position that manual actions cannot be used to comply with 10 CFR Part 50, Appendix R, Section III.G.2, was a backfit. At issue is your use of manual actions for achieving and maintaining hot shutdown conditions in the event of a fire in the Unit 1 emergency diesel generator corridor (Fire Zone 98J) and north switchgear room (Fire Zone 99M). In this letter, you asserted that the NRC has accepted such manual actions in the past, and stated that our position with respect to disallowing the use of manual actions for complying with Section III.G.2 of Appendix R should be considered a backfit that is generic to all plants.

On October 26, 2001, and again on January 17, 2002, we convened a backfit panel in accordance with NRC Management Directive 8.4, "NRC Program for Management of Plant-Specific Backfitting of Nuclear Power Plants," to review your backfit claim as stated in your letter of September 28, 2001. After careful consideration of your appeal, we have determined that (1) the NRC did not impose a regulatory staff position that is new or different from a previously applicable staff position relative to the requirements of 10 CFR Part 50, Appendix R, Section III.G.2; (2) the NRC did not approve the use of manual actions for complying with 10 CFR Part 50, Appendix R, Section III.G.2, in the Unit 1 diesel generator corridor and north electrical switchgear room in lieu of meeting the requirements of 10 CFR Part 50, Appendix R, Section III.G.2.a, III.G.2.b, or III.G.2.c; and (3) your methodology for using manual actions (in the event of a fire in the Unit 1 diesel generator corridor and north switchgear room), in lieu of

Information in this report was dated
 in accordance with the provisions of
 10 CFR 19.25
 NRC, Case File # 5
 FUA-2003-353

R13