



Entergy Operations, Inc.
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Michael A. Krupa
Director
Nuclear Safety & Licensing

CNRO-2002-00054

November 26, 2002

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Entergy Operations, Inc.
Proposed Alternative to ASME Examination Requirements for Repairs
Performed on Reactor Vessel Head Penetrations

Arkansas Nuclear One, Unit 1
Docket No. 50-313
License No. DPR-51

REFERENCE: Entergy Operations, Inc. Letter No. CNRO-2002-00052 to the NRC,
"Proposed Alternative to ASME Examination Requirements for Repairs
Performed on Reactor Vessel Head Penetrations," dated October 28,
2002

Dear Sir or Madam:

In the referenced letter, Entergy Operations, Inc. (Entergy) proposed alternatives to the requirements of ASME Sections III and XI as applied to reactor pressure vessel (RPV) nozzles. These alternatives were presented in Relief Request Nos. ANO1-R&R-003, Rev. 0 and ANO1-R&R-004, Rev. 0, respectively, and apply to Arkansas Nuclear One, Unit 1 (ANO-1).

In a telephone call between NRC staff representatives and Entergy representatives held on November 6, 2002, the staff verbally authorized the use of ANO1-R&R-003 and -004. In addition, the staff asked Entergy to transmit copies of three evaluations being performed to support the repairs as discussed in ANO1-R&R-004. These evaluations were described in ANO1-R&R-004 as follows:

- 1) Flaw evaluations for a postulated radial corner crack on the uphill side of the reactor head penetration [ANO Calculation 86-E-0074-156 (Framatome Document 32-5021538-00)]
- 2) Evaluation to determine the potential for debris from a cracking J-groove partial penetration weld [ANO Calculation 86-E-0074-164 (Framatome Document 51-5012789-00)]

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- 3) A limit load analysis considering the ductile Alloy 600/alloy 690 materials along the designated flaw propagation path [ANO Calculations 86-E-0074-160 and 86-E-0074-161 (Framatome Documents 51-5012728-03 and 32-5021539-00)]

The evaluations have been completed by Framatome-ANP and approved by Entergy for use at ANO-1. They are contained in Enclosures 1, 2, and 3, respectively.

Framatome-ANP considers information contained in ANO Calculations 86-E-0074-156 and 86-E-0074-161 (Framatome Documents 32-5021538-00 and 32-5021539-00) to be proprietary and confidential pursuant to 10 CFR 2.790(a)(4) and 10 CFR 9.17(a)(4). As such, Framatome-ANP has requested that this information be withheld from public disclosure. The affidavit supporting this request is provided in Enclosure 4. Entergy will provide nonproprietary versions of these calculations under separate letter as they become available.

Should you have any questions regarding this letter, please contact Guy Davant at (601) 368-5756.

This letter contains no commitments.

Very truly yours,

Guy H. Davant for M.A. Krupa

MAK/GHD/bal

- Enclosures: 1. ANO Calculation 86-E-0074-156
2. ANO Calculation 86-E-0074-164
3. ANO Calculations 86-E-0074-160 and 86-E-0074-161
4. Affidavit for Withholding Information from Public Disclosure

cc: Mr. C. G. Anderson (ANO)
Mr. W. R. Campbell (ECH)
Mr. G. A. Williams (ECH)

Mr. T. W. Alexion, NRR Project Manager (ANO-2)
Mr. R. L. Bywater, NRC Senior Resident Inspector (ANO)
Mr. E. W. Merschoff, NRC Region IV Regional Administrator
Mr. W. D. Reckley, NRR Project Manager (ANO-1)

ENCLOSURE 4

CNRO-2002-00054

**AFFIDAVIT FOR WITHHOLDING
INFORMATION FROM PUBLIC DISCLOSURE**

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is James F. Mallay. I am Director, Regulatory Affairs, for Framatome ANP ("FRA-ANP"), and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by FRA-ANP to determine whether certain FRA-ANP information is proprietary. I am familiar with the policies established by FRA-ANP to ensure the proper application of these criteria.

3. I am familiar with the information contained in two attachments to a letter from Entergy Operations to the NRC (Letter No CNRO-2002-00054). These two attachments are calculation summary sheets (designated 32-5021538 and 32-5021539) that address the flaw evaluation of certain CRDM nozzle welds and are referred to herein as "Documents." Information contained in these Documents has been classified by FRA-ANP as proprietary in accordance with the policies established by FRA-ANP for the control and protection of proprietary and confidential information.

4. These Documents contain information of a proprietary and confidential nature and is of the type customarily held in confidence by FRA-ANP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in the Documents be withheld from public disclosure.

6. The following criteria are customarily applied by FRA-ANP to determine whether information should be classified as proprietary:

- (a) The information reveals details of FRA-ANP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for FRA-ANP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for FRA-ANP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by FRA-ANP, would be helpful to competitors to FRA-ANP, and would likely cause substantial harm to the competitive position of FRA-ANP.

7. In accordance with FRA-ANP's policies governing the protection and control of information, proprietary information contained in these Documents have been made available, on a limited basis, to others outside FRA-ANP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. FRA-ANP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge,
information, and belief.

James P. Kelly

SUBSCRIBED before me this 25th
day of November, 2002.

Danita R. Kidd

Danita R. Kidd
NOTARY PUBLIC, STATE OF VIRGINIA
MY COMMISSION EXPIRES: 12/31/04