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1CAN020401

February 9, 2004

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

Subject: License Amendment Request
Application for Technical Specification Improvement to Eliminate Requirements for Hydrogen Recombiners and Hydrogen Monitors Using the Consolidated Line Item Improvement Process
Arkansas Nuclear One, Unit 1
Docket No. 50-313
License No. DPR-51

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests the following amendment to the Technical Specifications (TS) for Arkansas Nuclear One, Unit 1 (ANO-1).

The proposed amendment will delete the TS requirements related to hydrogen recombiners and hydrogen monitors. The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003. The changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the Federal Register on September 25, 2003 as part of the consolidated line item improvement process (CLIIP).

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications and commitments. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Implementation of TSTF-447 also involves various changes to the TS Bases. The TS Bases changes will be submitted with a future update in accordance with TS 5.5.14, "Technical Specifications (TS) Bases Control Program."

The proposed change includes a new commitment as summarized in Attachment 3.

Entergy requests approval of the proposed amendment by December 30, 2004. Once approved, the amendment shall be implemented within 120 days.

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If you have any questions or require additional information, please contact Ron Byrd at 601-368-5792.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 9, 2004.

Sincerely,

JSF/RWB

Attachments:
1. Analysis of Proposed Technical Specification Change
2. Proposed Technical Specification Changes (mark-up)
3. List of Regulatory Commitments

cc: Dr. Bruce S. Mallett
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Attachment 1

1CAN020401

Analysis of Proposed Technical Specification Change

1.0 INTRODUCTION

This letter is a request to amend Operating License DPR-51 for Arkansas Nuclear One, Unit 1 (ANO-1). The proposed License amendment deletes Technical Specification (TS) 3.6.7, "Hydrogen Recombiners," and references to the hydrogen monitors in TS 3.3.15, "Post Accident Monitoring (PAM) Instrumentation." The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003.

The changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the Federal Register on September 25, 2003 as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-447, the proposed TS changes include:

TS 3.3.15, Condition C Note	Applicability to hydrogen monitors	Deleted
TS 3.3.15, Condition D	Inoperable Hydrogen Monitors	Deleted
Table 3.3.15-1, Item 10	Reactor Building Hydrogen Concentration	Deleted
TS 3.6.7	Hydrogen Recombiners	Deleted

While these changes are consistent with the TSTF, there are minor numbering and format differences.

As described in NRC-approved Revision 1 of TSTF-447, the changes to TS requirements result in changes to various TS Bases sections. The TS Bases changes will be submitted with a future update in accordance with TS 5.5.14, "Technical Specifications (TS) Bases Control Program."

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

5.0 TECHNICAL ANALYSIS

Entergy has reviewed the safety evaluation (SE) published on September 25, 2003 (68 FR 55416) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE, as well as the supporting information provided to support TSTF-447. Entergy has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to ANO-1 and justify this amendment for the incorporation of the changes to the ANO-1 TS.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

6.1 Verification and Commitments

As discussed in the model SE published in the Federal Register on September 25, 2003 (68 FR 55416) for this TS improvement, Entergy is making the following verifications and regulatory commitments:

1. Entergy has verified that a hydrogen monitoring system capable of diagnosing beyond design-basis accidents is installed at ANO-1 and is making a regulatory commitment to maintain that capability. The hydrogen monitors will be included in the Technical Requirements Manual (TRM). This regulatory commitment will be implemented within 120 days of amendment issuance.

2. ANO-1 does not have an inerted containment.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

Entergy has reviewed the proposed no significant hazards consideration determination published on September 25, 2003 (68 FR 55416) as part of the CLIIP. Entergy has concluded that the proposed determination presented in the notice is applicable to ANO-1 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

Entergy has reviewed the environmental evaluation included in the model SE published on September 25, 2003 (68 FR 55416) as part of the CLIIP. Entergy has concluded that the staff's findings presented in that evaluation are applicable to ANO-1 and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. Entergy is not proposing variations or deviations from the TS changes described in TSTF-447 or the NRC staff's model SE published on September 25, 2003 (68 FR 55416).

10.0 REFERENCES

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement To Eliminate Hydrogen Recombiner Requirement, and Relax the Hydrogen and Oxygen Monitor Requirements for Light Water Reactors Using the Consolidated Line Item Improvement Process, published September 25, 2003, (68 FR 55416).

Attachment 2

1CAN020401

Proposed Technical Specification Changes (mark-up)

3.3 INSTRUMENTATION

3.3.15 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.15 The PAM instrumentation for each Function in Table 3.3.15-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

---NOTES---

1. LCO 3.0.4 is not applicable
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action to prepare and submit a Special Report.	Immediately
C. ~~NOTE Not applicable to hydrogen monitor channels.~~ One or more Functions with two required channels inoperable.	C.1 Restore one channel to OPERABLE status.	7 days
~~D. Two required hydrogen monitor channels inoperable.~~	~~D.1 Restore one required hydrogen monitor channel to OPERABLE status.~~	~~72 hours~~

CONDITION	REQUIRED ACTION	COMPLETION TIME
DE. Required Action and associated Completion Time of Condition C ~~or D~~ not met.	DE.1 Enter the Condition referenced in Table 3.3.15-1 for the channel.	Immediately
EF. As required by Required Action DE.1 and referenced in Table 3.3.15-1.	EF.1 Be in MODE 3. AND EF.2 Be in MODE 4.	6 hours 12 hours
FG. As required by Required Action DE.1 and referenced in Table 3.3.15-1.	FG.1 Initiate action to prepare and submit a Special Report.	Immediately

SURVEILLANCE REQUIREMENTS

----------NOTE----------
These SRs apply to each PAM instrumentation Function in Table 3.3.15-1.

SURVEILLANCE		FREQUENCY
SR 3.3.15.1	Perform CHANNEL CHECK for each required instrumentation channel that is normally energized.	31 days
SR 3.3.15.2	----------NOTE---------- Neutron detectors are excluded from CHANNEL CALIBRATION. --- Perform CHANNEL CALIBRATION.	 18 months

Table 3.3.15-1
Post Accident Monitoring Instrumentation

FUNCTION	REQUIRED CHANNELS	CONDITIONS REFERENCED FROM REQUIRED ACTION D~~E~~.1
1. Wide Range Neutron Flux	2	E~~F~~
2. RCS Hot Leg Temperature	2	E~~F~~
3. RCS Hot Leg Level	2	F~~G~~
4. RCS Pressure (Wide Range)	2	E~~F~~
5. Reactor Vessel Water Level	2	F~~G~~
6. Reactor Building Water Level (Wide Range)	2	E~~F~~
7. Reactor Building Pressure (Wide Range)	2	E~~F~~
8. Penetration Flow Path Automatic Reactor Building Isolation Valve Position	2 per penetration flow path[(a)(b)]	E~~F~~
9. Reactor Building Area Radiation (High Range)	2	F~~G~~
10. ~~Reactor Building Hydrogen Concentration~~Deleted	~~2~~	~~F~~
11. Pressurizer Level	2	E~~F~~
12. a. SG "A" Water Level – Low Range	2	E~~F~~
b. SG "B" Water Level – Low Range	2	E~~F~~
c. SG "A" Water Level – High Range	2	E~~F~~
d. SG "B" Water Level – High Range	2	E~~F~~
13. a. SG "A" Pressure	2	E~~F~~
b. SG "B" Pressure	2	E~~F~~
14. Condensate Storage Tank Level	2	E~~F~~
15. Borated Water Storage Tank Level	2	E~~F~~
16. Core Exit Temperature (CETs per quadrant)	2	E~~F~~
17. a. Emergency Feedwater Flow to SG "A"	2	E~~F~~
b. Emergency Feedwater Flow to SG "B"	2	E~~F~~
18. High Pressure Injection Flow	2	E~~F~~
19. Low Pressure Injection Flow	2	E~~F~~
20. Reactor Building Spray Flow	2	E~~F~~

(a) Not required for isolation valves whose associated penetration is isolated by at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.

(b) Only one position indication channel is required for penetration flow paths with only one installed control room indication channel.

3.6 REACTOR BUILDING SYSTEMS

3.6.7 Hydrogen Recombiners

LCO 3.6.7 Two hydrogen recombiners shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One hydrogen recombiner inoperable.	A.1 NOTE LCO 3.0.4 is not applicable. Restore hydrogen recombiner to OPERABLE status.	30 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.7.1	Perform a system functional test for each hydrogen recombiner.	18 months
SR 3.6.7.2	Visually examine each hydrogen recombiner enclosure and verify there is no evidence of abnormal conditions.	18 months

SURVEILLANCE		FREQUENCY
SR 3.6.7.3	Perform a resistance to ground test for each heater phase.	18 months

Attachment 3

1CAN020401

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Entergy has verified that a hydrogen monitoring system capable of diagnosing beyond design-basis accidents is installed at ANO-1 and is making a regulatory commitment to maintain that capability. The hydrogen monitors will be included in the Technical Requirements Manual (TRM).		X	Within 120 days of amendment issuance.