

June 21, 2004

LICENSEE: Entergy Operations Inc.

FACILITY: Arkansas Nuclear Station, Unit 2

SUBJECT: SUMMARY OF TELEPHONE CALLS HELD ON MARCH 24 AND APRIL 16, 2004, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION (NRC) STAFF AND ENTERGY OPERATIONS INC., REPRESENTATIVES CONCERNING DRAFT REQUEST FOR ADDITIONAL INFORMATION PERTAINING TO THE ARKANSAS NUCLEAR ONE, UNIT 2 LICENSE RENEWAL APPLICATION (TAC NO. MB8402)

On March 24 and April 16, 2004, the NRC staff and representatives of the Entergy Operations Inc., held telephone conferences to discuss draft request for additional information (RAI) pertaining to the technical review for the Arkansas Nuclear One, Unit 2 license renewal application (LRA).

These conference calls were used to clarify the intent of the staff's questions and determine whether the applicant's draft responses demonstrated an understanding of the staff's question. On the basis of the discussion, the applicant acknowledged a better understanding of each question. No staff decisions were made during these telephone conferences. In some cases, the applicant agreed to provide information for clarification, and the staff agreed to revise RAI's.

Enclosure 1 provides a listing of the telephone conference call participants. Enclosure 2 contains a listing of the draft RAI's, draft responses from the applicant, and a brief description of the status of each item. A copy of this summary was provided to the applicant for comment.

/RA/

Gregory F. Suber, Project Manager
License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket No.: 50-368

Enclosures: As stated

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DATE:	6/21/04	6/21/04	6/21/04

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**LIST OF PARTICIPANTS
TELEPHONE CALLS WITH ENTERGY OPERATIONS INC.
ARKANSAS NUCLEAR ONE, UNIT 2
LICENSE RENEWAL APPLICATION**

March 24 and April 16, 2004

Attendees

Natalie Mosher
Ted Ivy
Andy Taylor
Michael Stroud
Harold Walker*
Janak Raval
Gregory Suber

Affiliation

Entergy
Entergy
Entergy
Entergy
U.S. Nuclear Regulatory Commission (NRC)
NRC
NRC

*(not on April 16th call)

**REQUEST FOR ADDITIONAL INFORMATION
PERTAINING TO THE SCOPING AND SCREENING
REVIEW OF THE ARKANSAS NUCLEAR ONE - UNIT 2
LICENSE RENEWAL APPLICATION (TAC NO. MB8402)**

Division of Systems Safety and Analysis (DSSA)

Draft RAI 2.3-1

Section 2.1.1 states the following with respect to the scoping methodology for the Heating, Ventilation, and Air Conditioning (HVAC) Systems: "Consistent with NEI 95-10, the scoping process used for the ANO-2 license renewal project began with a list of plant systems and structures, determined the functions they perform, and then determined which functions met any of the three criteria of 10 CFR 54.4(a). Functions that meet any of the criteria are intended functions for license renewal, and the systems and structures that perform these functions are included within the scope of license renewal." In order for the staff to determine that you have not omitted any structures, systems, and components that should be within the scope of license renewal according to 10 CFR 54.4(a), describe the details of the process used to confirm whether you have included all the structures, systems, and components in such systems and structures within the scope of license renewal.

Draft Response: In accordance with 10 CFR 54.21(a)(1), structures and components subject to AMR are those that perform an intended function without moving parts or a change in configuration or properties and that are not subject to replacement based on a qualified life or specified time period. Within the systems and structures in the scope of license renewal, structures and components that are subject to aging management review (AMR) were identified in accordance with 10 CFR 54.21. All components within the systems identified in the LRA in Table 2.2-1a and Table 2.2-1b were conservatively considered to be within the scope of license renewal for the purpose of identifying components and structures that are subject to AMR.

In conclusion, all components within the systems identified in LRA Tables 2.2-1a and 2.2-1b, and all structures identified in LRA Table 2.2-3, were conservatively considered to be within the scope of license renewal for the purposes of identifying components and structures that are subject to AMR.

Status: The applicant's response demonstrated an understanding of the staff's question. This question was combined with Draft RAI 2.3-3 as part b and submitted formally.

Draft RAI 2.3-2

In the preface to the LRA on Page 1 it is stated in the third paragraph that, "...the Tables provide a reference to the results of the aging management review for each component and commodity type. The descriptions of systems in Section 2 identify license renewal drawings that document the components subject to aging management review for mechanical systems. The drawings are provided in a separate submittal."

Also, in Section 2.1.1, "Scoping Methodology," you have stated that, "License renewal drawings were prepared to indicate components subject to aging management review. Components that

are subject to aging management review based only on the criterion of 10 CFR 54.4(a)(2) are not indicated on the drawings.”

In order for the staff to determine that you have not omitted any structures, systems, and components that should be within the scope of license renewal according to 10 CFR 54.4(a), describe the process used to confirm whether you have included all the structures, systems, and components in the scope of license renewal for the HVAC Systems.

Draft Response: As stated in the response to RAI-1, all components within the systems identified in the LRA in Table 2.2-1a and Table 2.2-1b and all structures identified in LRA Table 2.2-3, were conservatively considered to be within the scope of license renewal for the purposes of identifying components and structures that are subject to AMR. This would include components in systems included only for 10 CFR 54.4(a)(2). The inclusion of systems for only 10 CFR 54.4(a)(2) is indicated in Table 2.2-1a under the LRA Section column by a reference to Section 2.3.3.11, Miscellaneous Systems in Scope for 10 CFR 54.4(a)(2).

Status: The applicant’s response demonstrated an understanding of the staff’s question. This question was combined with Draft RAI 2.3-3 as part b and submitted formally.

Draft RAI 2.3-3

Clarify whether the sealants used on the main control room envelope (MCRE) to prevent unfiltered inleakages are included in the scope of license renewal in accordance with 10 CFR 54.4(a), and subject to an aging management review in accordance with 10 CFR 54.21(a)(1). If so, provide the relevant information to complete Table 2.3.3.10. If the sealants are not considered subject to an AMR, provide justification for their exclusion.

Draft Response: Sealants or elastomers that are used on the main control room envelope (MCRE) are included in the scope of license renewal. These sealants are structural sealants used to minimize leakage into the control room. They are addressed as part of structural bulk commodities and are subject to aging management review as documented in section 2.4. The sealants are listed under “Elastomers” in table 2.4-4 of the LRA.

Status: The applicant’s response demonstrated an understanding of the staff’s question. However, the staff asked whether the structural sealants ("Elastomers"), as listed in Table 2.4-4 of the LRA, include the MCRE ductwork and component housing sealants. The applicant acknowledged an understanding of the question. This RAI was revised to address the MCRE ductwork and submitted formally.

Draft RAI 2.3-4

Clarify whether sealants used as a pressure boundary function for the auxiliary building ventilation system are within the scope of license renewal in accordance with 10 CFR 54.4(a), and subject to an aging management review in accordance with 10 CFR 54.21(a)(1). If they are, provide the relevant information about the sealants to complete Table 2.3.3.9. If the sealants are excluded from the scope of license renewal and not subject to an AMR, provide justification for this exclusion.

Draft Response: Sealants are not credited with a function of maintaining pressure boundary for auxiliary building ventilation system. No sealants used in the auxiliary building ventilation system perform a license renewal intended function.

Status: The applicant's response demonstrated an understanding of the staff's question. This question was combined with Draft RAI 2.3-3 as part b and submitted formally.

Draft RAI 2.3-5

It seems that the penetration rooms ventilation system (see ANO-2 FSAR Section 6.5, "Penetration Rooms Ventilation System") is excluded from the license renewal application. If it is addressed as part of other ventilation systems, provide related information for the penetration rooms ventilation system components that are within the scope of license renewal in accordance with 10 CFR 54.4(a), and subject to an aging management review in accordance with 10 CFR 54.21(a)(1) or provide justification for the exclusion of the penetration rooms ventilation system from the LRA.

Additionally, provide the relevant information in the AMR table about the penetration room sealant materials use for a pressure boundary function that are within the scope of the license renewal in accordance with 10 CFR 54.4(a) and subject to an aging management review in accordance with 10 CFR 54.21(a)(1) or provide justification for its exclusion.

Draft Response: The penetration room ventilation system is not in scope of license renewal as documented in Table 2.2-2 on page 2.2-8 of the LRA. The ANO-2 system and structure scoping method and results report documents that the purpose of the containment penetration room ventilation system is to maintain a negative pressure in the penetration rooms by drawing on the rooms and exhausting to the atmosphere. This system is not credited in post accident offsite dose analyses and is not required to maintain potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11. This system is not credited with operation during any regulated events. In addition, SAR section 6.5.1 states that the penetration room ventilation system is not credited for iodine removal in the accident analyses. Also, sealants (or elastomers) are not credited with maintaining penetration room pressure boundary.

Status: The applicant's response demonstrated an understanding of the staff's question. The staff requested that the applicant confirm that the plant's technical specifications did not contain references to the penetration room ventilation system since referencing the system in the technical specifications would suggest that the system performed an intended function and may be within the scope of license renewal. This question was submitted formally.

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