

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV 611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-4005

August 19, 2004

Jeffrey S. Forbes Vice President Operations Arkansas Nuclear One Entergy Operations, Inc. 1448 S.R. 333 Russellville, AR 72801-0967

SUBJECT: MEETING WITH ARKANSAS NUCLEAR ONE PLANT MANAGEMENT TO

DISCUSS IMPROVEMENTS TO THEIR FIRE PROTECTION PROGRAM

Dear Mr. Forbes:

This refers to the Category 1 public meeting conducted on August 10, 2004, at the Region IV Office, Arlington, Texas, with representatives of Entergy Operations, Inc. The purpose of the meeting was to discuss aspects of the Arkansas Nuclear One fire protection program, including Entergy's manual action review project, interim compensatory measures, and fire protection improvement program.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

//RA//

Linda Joy Smith, Chief Plant Engineering Branch Division of Reactor Safety

Dockets: 50-313

50-368

Licenses: DPR-51

NPF-6

Enclosures:

- 1. Attendance List
- 2. Licensee Presentation

CC:

Senior Vice President & Chief Operating Officer Entergy Operations, Inc. P.O. Box 31995 Jackson, MS 39286-1995

Vice President Operations Support Entergy Operations, Inc. P.O. Box 31995 Jackson, MS 39286-1995

Manager, Washington Nuclear Operations ABB Combustion Engineering Nuclear Power 12300 Twinbrook Parkway, Suite 330 Rockville, MD 20852

County Judge of Pope County Pope County Courthouse 100 West Main Street Russellville, AR 72801

Winston & Strawn 1400 L Street, N.W. Washington, DC 20005-3502

Bernard Bevill
Radiation Control Team Leader
Division of Radiation Control and
Emergency Management
Arkansas Department of Health
4815 West Markham Street, Mail Slot 30
Little Rock, AR 72205-3867

James Mallay Director, Regulatory Affairs Framatome ANP 3815 Old Forest Road Lynchburg, VA 24501

Entergy Operations, Inc.	-3-
--------------------------	-----

Electronic distribution by RIV: Regional Administrator (BSM1)

Deputy Regional Administrator (TPG)

DRP Director (ATH)

DRS Director (DDC)

Branch Chief, DRP/D (TWP)

Senior Resident Inspector (RWD)

Senior Project Engineer, DRP/D (CJP)

Staff Chief, DRP/TSS (PHH)

RITS Coordinator (KEG)

Region IV PAO (VLD)

ANO Site Secretary (VLH)

Jennifer Dixon-Herrity, OEDO RIV Coordinator (JLD)

ΑĽ	DAMS: X Yes	□ No)	Initials:			
X	Publicly Availab	le		Non-Publicly Available	Sensitive	X	Non-Sensitive

R:_ano\2004\AN8-10-04MS-PEB.wpd

TL:PEB	C:DRP/D	C:PEB	
RLNease;jlh	TWPruett	LJSmith	
/RA/	/RA/	/RA/	
8/ 16 /04	8/16 /04	8/19 /04	

ENCLOSURE 1 ATTENDANCE LIST

Attending in the Region IV office in Arlington, TX

<u>Name</u>	<u>Organization</u>
Pat Gwynn	NRC Region IV - Deputy Regional Administrator
Dwight Chamberlain	NRC Region IV - Director, Division of Reactor Safety (DRS)
Vonna Ordaz	NRC Region IV - Acting Deputy Director, DRS
Linda Smith	NRC Region IV - Chief, Plant Engineering Branch (PEB), DRS
Troy Pruett	NRC Region IV - Chief, Branch D, Division of Reactor Projects
Victor Dricks	NRC Region IV - Public Affairs Officer
Rebecca Nease	NRC Region IV - Team Leader, PEB/DRS
Elizabeth Owen	NRC Region IV - Reactor Inspector, Nuclear Safety Professional Development Program, DRS
Austin Hansley	NRC Region IV - Engineering Associate, PEB/DRS
Isabel Montoya	NRC Region IV - Engineering Associate, Engineering Branch, DRS
Jeff Forbes	Entergy - Vice President, Operations
Joe Kowalewski	Entergy - Director of Engineering
Dale James	Entergy - Manager, Licensing
Leslie Compton	Entergy - Manager, Engineering Programs and Components
Rebecca Puckett	Entergy - Supervisor, Engineering

Attending via video-conference or tele-conference

<u>Name</u>	<u>Organization</u>	
Robert Gramm	NRC Office of Nuclear Reactor Regulation (NRR) Region IV - Section Chief Project Directorate 4-1	
Alex Klein	NRC/NRR - Senior Fire Protection Engineer	
See-Meng Wong	NRC/NRR - Senior Risk Analyst	
Jim Bongarra	NRC/NRR - Engineering Psychologist	
Drew Holland	NRC/NRR - Project Manager	
Phil Qualls	NRC/NRR - Fire Protection Engineer	
Paul Gunter	Nuclear Information Resource Service	

ENCLOSURE 2 LICENSEE'S PRESENTATION

_

ANO Fire Protection August 10, 2004

Overview of Topics - Agenda

- Jeff Forbes Vice President
- Introduction and Agenda
- Joe Kowalewski Director Engineering
- Compensatory Measures
- Manual Action Review Project
- Fire Protection Improvement Project
- Jeff Forbes Vice President
- □ Summary

ď

Introduction

- Introduction of Team
- Major Compliance Issues
- Lack of Zone Specific Procedures
- Complexity of Manual Actions
- Immediate Compensatory Actions Taken
- Focus on Steps to Achieve Compliance
- Manual Action Review Project
- Modifications and Analyses to Reduce Risk
- Comprehensive Fire Protection Improvement **Project**

Defense-in-Depth Approach Compensatory Measures

- Immediately established firewatches
- Developed zone-specific procedures
- Performed feasibility assessments
- Training

Manual Action Review Project

- Process utilized
- Convened expert panel
- Reviewed timelines for all zones with hot shutdown manual actions (40 zones)
- Review criteria
- Time critical tasks for elimination
- Tasks to reduce complexity

Manual Action Review Project Results of Review

- Strategies for risk reduction
- Prevent RCS inventory loss
- Prevent heat addition to the reactor coolant outside of decay heat
- Eliminate manual local start of EDG
- Protect buss power supply
- Proposed changes
- Eliminate 21 action sequences in 13 zones
- Eliminate 12 action sequences required in less than 30 minutes
- Results
- No action requires less than 30 minutes
- All manual actions accomplished with a single Operator

Comprehensive Fire Protection Improvement Project

- Self assessment conducted March 2004
- Address major new initiatives in the industry
- Fire Induced Circuit Failures (FICF)
- Manual Action Rule-Making
- Established fleet procedures for incorporation of new guidance
 - Coupled with commitments to reduce risk by elimination of specific manual actions
- Reconstitute Fire Protection Program from ground up
- Significant effort
- \$3~5 million in engineering and modifications
- Driven by detailed project plan and 2004 Operating Plan as a site

Fire Protection Improvement Project Major Elements

- Fire Prevention
- Control of combustibles
- Suppression and Detection
- Reviews to ensure adequacy for the hazard
 - Beview hydraulic calculations
- Review flooding calculations

Fire Protection Improvement Project Major Elements

- Safe Shutdown Methodology
- Validate Safe Shutdown Equipment List
- Validate Appendix R functional requirements and logics
- Assess/implement impact of fire induced circuit failure
- Fire area compliance
- Upgrade zone specific procedures to new guidelines assessments
- Update safe shutdown capability and fire program documents

Fire Protection Improvement Project Major Milestones

- Fire prevention improvements 9/30/04
- Zone specific procedure updates 9/30/04
- Schedule of updates from Manual Action Review Project 9/30/04
- Fire detection/suppression review 9/30/04
- Safe shutdown methodology
- Validate Safe Shutdown Equipment List and functional requirements –
- Assess/implement impact of fire induced circuit failure 12/31/04
- Fire Area Compliance Assessments 6/30/05
- Update safe shutdown capability and fire program documents 7/31/05
- Schedule for exemption requests and modifications 12/31/05
- Complete Safe Shutdown Capability Analysis, Fire Hazards Analysis, design calculations and procedure updates – 12/30/06

Summary

- New compliance strategy
- Cooperation instead of confrontation
- Reduce risk associated with manual actions
- Comprehensive program upgrades
- We are committed to doing the right thing