

August 25, 2004

LICENSEE: Entergy Operations Inc.

FACILITY: Arkansas Nuclear Station, Unit 2

SUBJECT: SUMMARY OF TELEPHONE CALLS HELD ON JULY 7 AND 8, 2004,
BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION (NRC) STAFF
AND ENTERGY OPERATIONS INC., REPRESENTATIVES CONCERNING
REQUEST FOR ADDITIONAL INFORMATION PERTAINING TO THE
ARKANSAS NUCLEAR ONE, UNIT 2 LICENSE RENEWAL APPLICATION
(TAC NO. MB8402)

On July 7 and 8, 2004, the NRC staff and representatives of the Entergy Operations Inc., held telephone conference calls to discuss formal responses to the request for additional information (RAI) pertaining to the technical review for the Arkansas Nuclear One, Unit 2 license renewal application.

These conference calls were used to clarify the staff's position with respect to certain responses to RAI's. On the basis of the discussion, the applicant agreed to modify and/or supplement several responses.

Enclosure 1 provides a listing of the telephone conference call participants. Enclosure 2 contains a listing of the RAI's, formal 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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**LIST OF PARTICIPANTS
TELEPHONE CALLS WITH ENTERGY OPERATIONS, INC.
ARKANSAS NUCLEAR ONE, UNIT 2
LICENSE RENEWAL APPLICATION**

JULY 7 AND 8, 2004

Participants

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Ted Ivy
Alan Cox
Michael Stroud
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**REQUEST OF ADDITIONAL INFORMATION FOR
ANO-2 LICENSE RENEWAL APPLICATION**

RAI 2.3-1

LRA Section 2.1.1 states that license renewal drawings were prepared to indicate components subject to aging management review. However, the license renewal drawing legends indicate that the highlighted portions of the systems with flags represent the systems and components that are within the scope of license renewal. There appears to be an inconsistency between the drawing legend and the LRA statement.

The staff requested the applicant to clarify which one is correct. 10 CFR 54.21(a)(2) requires applicants to describe and justify the methods used in paragraph (a)(1) of 10 CFR 54.21. LRA Section 2.1.2 briefly describes the screening methodology as such: “for each mechanical system within the scope of license renewal, the screening process identified those components that are subject to an aging management review.” This description of the screening methodology, specifically for mechanical systems, is not clear to the staff. It does not adequately describe the method used to determine how a component is screened from further evaluation. Please provide an appropriate description and justification for the methodology used to perform the screening of mechanical components, including a discussion of how the system evaluation boundaries were established and component intended functions were determined.

Applicant’s Response

Section 2.1.1 states, “License renewal drawings were prepared to indicate components subject to aging management review.” This statement is correct. License renewal boundary flags and color highlighting are used to indicate the piping and components within the scope of license renewal that are subject to aging management review. The drawings are intended to be an aid used in conjunction with the tables in Section 2.0 of the LRA to “identify and list those structures and components subject to an aging management review” as required by 10 CFR 54.21(a)(1).

Scoping was performed at the system level. Systems and structures that performed intended functions are in scope as indicated in Tables 2.2-1a, 2.2-1b, and 2.2-3. Systems and structures that are not within the scope of license renewal are listed in Tables 2.2-2 and 2.2-4. If a system is in scope, then all of the components in that system are conservatively considered within the scope of license renewal for the purpose of identifying components and structures that are subject to aging management review. Screening is then performed to determine which components are subject to aging management review. For screening in accordance with 10 CFR 54.21(a)(1), structures and components subject to aging management review 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. Functions for the systems were identified based on reviews of applicable plant licensing and design documentation. The applicable sections of the SAR, technical specifications, Maintenance Rule Scoping Documents, Upper Level Documents, and ANO topical reports for the NRC regulations identified in 10 CFR 54.4(a)(3) were used to determine system functions and identify the components that perform intended functions required to accomplish those system functions. The license renewal boundary on the drawings may be defined as the

boundary between the portion of the system that performs an intended function (requires an aging management review) and the portion of the system that does not perform an intended function (does not require an aging management review).

Staff's Comment

The staff cannot identify all components, especially those in scope per 50.54(a)2.

Status

The applicant referred the staff to the mechanical scoping and screening document which clarified which specific components were excluded from the scope of license renewal. The applicant will supplement the response to include more information for a(2) components.

RAI 2.3.3.11-1(c)

10 CFR 54.21(a) requires license renewal applicants to identify and list those structures and components subject to an aging management review. However, the application does not satisfy this requirement because mechanical components within the scope of license renewal in accordance with 10 CFR 54.21(a)(2) are neither identified as being subject to an aging management review on license renewal drawings nor by any designator or specific description in the engineering report. The engineering report (A2 ME-2003-0001-0) provides a general description on aging management of non safety related systems and components affecting safety related systems but does not specify or identify the components that require an aging management review for each system. The Staff requested that the applicant provide a means of specifically identifying mechanical components subject to an aging management review.

Applicant's Response

Section 2.1.1.2 of the LRA describes the application of 10 CFR 54.4(a)(2) criterion at ANO-2. The impacts of nonsafety-related structures, systems, and components (SSCs) failure were considered as either functional or spatial. In a functional failure, the failure of an SSC to perform its normal function impacts another safety function. In a spatial failure, a safety function is impacted by the loss of structural or mechanical integrity of an SSC in physical proximity to a safety-related component. Spatial failures result in the inclusion of the most equipment. Section 2.1.1.2.2 of the LRA provides information on how and where nonsafety-related equipment can impact safety-related equipment through spatial interaction. As documented in engineering report A2-ME-2003-0001-0, a review of all mechanical systems at ANO-2 was performed. If a system contained components that required aging management review for 10 CFR 54.4(a)(2), then the component types that required aging management review were listed in the system section. Highlighted flow diagrams that indicate 10 CFR 54.4(a)(2) components would be of limited value to a reviewer since flow diagrams do not provide equipment location information. Without location information, it cannot be determined if nonsafety-related equipment has a potential for spatial interaction such as from leakage or spray with safety-related equipment.

In addition, as described in the engineering report A2-ME-2003-0001-0 the following conservative approach was used to identify systems that meet 10 CFR 54.4(a)(2) and components that are subject to aging management review for leakage and spray.

First the structures at ANO-2 containing safety-related equipment were identified. The ANO-2 containment building, auxiliary building, intake structures, and emergency diesel fuel oil storage

vault are the primary seismic Class 1 structures at ANO-2 containing safety related plant equipment. These areas contain the relevant targets, i.e., safety related SSCs with the potential to be affected by failure of nonsafety-related components. All ANO-2 mechanical systems were reviewed. If the system contained liquid or steam and had nonsafety-related equipment in the containment building, auxiliary building, intake structures, or emergency diesel fuel oil storage vault then a review of individual system components was performed. This was performed with the ANO-2 component database information that identifies component locations. Liquid or steam filled nonsafety-related components in the safety-related structures specified above were reviewed for their potential for interaction with safety-related equipment using equipment location information in the ANO-2 component database and equipment layout drawings. As a very conservative first cut, all nonsafety-related components containing liquid or steam located in the containment building, auxiliary building, intake structure and emergency diesel fuel storage vault were considered subject to aging management review unless no safety-related equipment was in the area of the nonsafety-related component. This process resulted in many nonsafety-related components being included even though they likely cannot impact safety-related equipment. In limited cases, additional reviews were performed to exclude specific nonsafety-related components where design features, such as room separation, walls, panels or enclosures, would protect safety-related equipment from leakage or spray. This conservative approach for scoping and screening of nonsafety related components assures that components within the scope of license renewal and subject to an aging management review in accordance with the requirements of 10 CFR 54.4(a)(2) have been identified to the extent necessary to assure effective management of the effects of aging.

Status

The staff requested more information on particular components that were excluded from the scope of license renewal and the justification for the exclusion. The applicant stated that the list of excluded components was in the mechanical scoping and screening document. The staff indicated that no additional information was required at this time.

RAI 2.3.4.2-1

LRA Section 2.3.4.2 states that the second block valve (outboard) on each train of the main feedwater system is safety-related. License renewal drawing LRA M 2206, Sheet 1, does not highlight the valves (2-CV-1023-2 and 2CV-1073-2) as being subject to aging management review. These valves (as the backup main feedwater isolation valves) receive an isolation signal to close during steam line breaks (either via the main steam isolation signal or the containment spray actuation signal). These valves are credited in the SAR Chapter 15 analyses. Provide justification for not including the outboard second feedwater block valve within the scope of license renewal, and not including its valve body as being subject to an aging management review.

Applicant's Response

The second (outboard) block valves are within the scope of license renewal (as part of the main feedwater system) but are not subject to aging management review as they perform their intended function with moving parts. Their only intended function is to provide feedwater isolation, which relies on the closure of the valve disc by the motor operator. The loss of pressure boundary in this portion of the system would not prevent satisfactory isolation of feedwater flow to the steam generators.

Staff's Comment

The drawing shows second outboard block valve as not safety related. This conflicts with statement on FSAR (LRA 2.3.4.2) stating that the valve is safety related. The applicant was requested to clarify this apparent contradiction.

Status

The applicant stated that the second (outboard) block valve is safety related, however, the safety function is performed by the internals of the valve. Since the safety function is active, the valve is not subject to aging management. The applicant will revised its response and submit it formally.

RAI 2.3.4.3-1

License renewal drawing LRA-M-2204, Sheet 4, does not show the nonsafety related auxiliary feedwater (AFW) pump and its auxiliaries as being subject to aging management review. SAR Section 10.4.9.2 states that one of the functions of the AFW pump is to provide feedwater to the steam generators when both safety-related emergency feedwater (EFW) pumps are not available. SAR Section 3.6.4.1.5.2 states that a high energy line break is postulated in the common steam line from both the steam generators at valve 2CV-0340-2 (license renewal drawing LRA-M-2202, Sheet 4 (at location B-4). As a result of this postulated break, the turbine driven EFW pump will not be available to supply feedwater to the steam generators. As described in SAR Section 3.6, a single failure of the remaining EFW pump would require the AFW pump to provide feedwater flow to the steam generators to bring the plant to a safe shutdown condition. However, SAR Section 3.6 does not explain how plant safe shutdown will be achieved with this postulated break. If the AFW pump is used to mitigate the consequences of a postulated high energy line break in the SAR, then the AFW pump should be within the scope of license renewal to meet the criteria of 10 CFR 54.4(a)(2). Justify the exclusion of the AFW pump and its auxiliaries from being subject to an aging management review.

Applicant's Response

Section 3.6.4.1.5.2 of the SAR states that a break in the 4-inch steam line to the emergency feedwater pump driver will not require safety systems actuation since the blowdown in the line is within the makeup of the main feedwater pumps to the steam generators. Isolation valves are available in the lines from the individual steam generators to isolate a break in the common steam line. The AFW pump and its auxiliaries are not subject to aging management review since the AFW pump and its auxiliaries have no intended functions that support the functions in the scoping criteria of 10 CFR 54.4(a)(1), (a)(2) or (a)(3).

Status

The staff indicated that no additional information was required at this time.

RAI 2.3.4.3-2

License renewal drawing LRA-M-2204, Sheet 4 (at locations E7 and G4), shows only a portion of the minimum recirculation lines (upstream of valves 2EFW-10A and 2EFW-10B) as being subject to an aging management review. These valves are throttling valves, which do not necessarily provide an adequate pressure boundary function. The minimum recirculation piping extends beyond this drawing to another drawing M-2229, which is not provided. Failure of the downstream piping could result in a loss of pressure boundary intended function. Provide drawing M-2229 so that the staff can determine if any passive failures downstream could impact

the function of the system, and therefore, should be included in scope and subject to an aging management review for license renewal.

Applicant's Response

Each minimum recirculation line contains an orifice and globe valve. The orifices allow the minimum required recirculation flow for the pumps while ensuring sufficient flow is provided to the steam generators as required for design basis events. Thus, piping and components downstream of the orifices and globe valves are not required to maintain pressure boundary for the steam generators to receive sufficient flow for design basis events, and they do not have an intended function based on the criteria of 10 CFR 54.4(a)(1) or 10 CFR 54.4(a)(3).

Passive components in the minimum recirculation line downstream of 2EFW-10A and 2EFW-10B do have a pressure boundary intended function for 10 CFR 54.4(a)(2). In accordance with Section 2.1.1 of the LRA, components subject to aging management review based only on the criterion of 10 CFR 54.4(a)(2) are not indicated on the LRA drawings. The nonsafety-related portions of the emergency feedwater system that require aging management review based on the criterion of 10 CFR 54.4(a)(2) are evaluated in Section 2.3.3.11 of the LRA.

Status

The staff indicated that no additional information was required at this time.

RAI 2.5-2

ISG-2, NRC Staff Position on the License Renewal Rule (10 CFR 54.4) as it relates to the SBO Rule (10 CFR 50.63), states, in part, that "The offsite power systems of U.S. nuclear power plants consist of a transmission system (grid) component that provides a source of power and a plant system component that connects that power source to a plant's onsite electrical distribution system which powers safety equipment. For the purpose of the license renewal rule, the staff has determined that the plant system portion of the offsite power system that is used to connect the plant to the offsite power source should be included within the scope of the rule." Provide a detailed description (including a one-line drawing showing the path of recovery) of ANO-2's recovery path and discuss how the recovery path is in compliance with ISG-2. The discussion should also include restoration of power to each 4.16 kV safety bus. Furthermore, on the one-line drawing, please indicate the portions of the recovery path that are overhead or underground.

Applicant's Response

The recovery path for SBO is described in LRA Section 2.5 as follows.

"Specifically the path includes the switchyard circuit breakers feeding the startup transformer, the startup transformer, the circuit breaker-to-transformer and transformer to onsite electrical interconnections, and the associated control circuits and structures."

The voltage regulator is also included since it is part of the interconnection between the switchyard circuit breaker and the startup transformer.

ISG-2 discussion of the offsite power path states, "This path typically includes the switchyard circuit breakers that connect to the offsite system power transformers (startup transformers),

the transformers themselves, the intervening overhead or underground circuits between circuit breaker and transformer and transformer and onsite electrical distribution system, and the associated control circuits and structures.” Compliance with ISG-2 is demonstrated by the fact that the equipment described in LRA Section 2.5 is the same equipment described in the ISG with the addition of the voltage regulator.

Consistent with ISG-2 for SBO recovery, the boundary between the transmission system (grid) offsite power source and the plant system components is the 22kV/4.16kV startup transformer. The 22kV switchyard circuit breaker (B0126) that feeds the startup transformer at ANO-2 is the offsite power connection point to the transmission system that is the boundary point described in ISG-02 (first switchyard breaker). Medium-voltage insulated cable, installed in underground duct bank, runs between the switchyard breaker B0126 and the startup transformer voltage regulator. Switchyard bus connects breaker B0126 and the voltage regulator to the medium-voltage insulated cables. Medium-voltage insulated cable, installed in underground duct bank, runs between the startup transformer voltage regulator and startup transformer #3. Switchyard bus connects the voltage regulator and startup transformer #3 to the medium-voltage insulated cables. High-voltage insulators, which are utilized with the switchyard bus, are included in the scope of license renewal for the SBO recovery path. Startup transformer #3 is connected to the 4.16kV safety busses with non-segregated phase bus.

Instrument and control cables for switchyard breaker B0126, the voltage regulator, and the startup transformer are also included in the scope of license renewal for this recovery path. These cables are included in the “Electrical cables and connections not subject to 10 CFR 50.49 EQ requirements” program listed in LRA Table 3.6.2-1.

The attached sketch diagrams the offsite power path from the switchyard grid connection to the 4.16kV safety busses. Overhead and underground portions of the circuit are identified. Refer to the ANO-2 Safety Analysis Report Figures 8.2-2, 8.3-1, 8.3-3, and 8.3-23 for additional details.

Staff’s Comment

The staff stated that scoping for the ANO-2’s Station Blackout Recovery path is inadequate because it does not include the first breaker in the switchyard in reference to their incoming feed(s) (i.e., Breakers 5148, 1215, and 1212).

Status

The applicant stated that their position with respect to the Station Blackout Recovery path was consistent with ISG-2. The staff is requesting additional information on the configuration of the ANO-2 switchyard.

RAI 3.1.1-1

For Item 3.1.1-2, the applicant identifies the Inservice Inspection Program to manage loss of material due to pitting and crevice corrosion in the steam generator shell assembly. NRC Information Notice (IN) 90-04 states that the American Society of Mechanical Engineers (ASME) Code Section XI inservice inspection method may not be sufficient to detect general and pitting corrosion in the shell/transition cone welds. The applicant states that the concerns of NRC IN 90-04 are not applicable to ANO-2 steam generators because they were replaced in

2000 and pitting corrosion of the steam generator shell is not known to currently exist. However, the Staff believes that the current operating experience does not provide reasonable assurance that pitting will not occur at the shell assembly in the future. In absence of corrosion tests to demonstrate that the shell and transition cone would not develop pitting corrosion at the end of the extended period of operation, pitting and general corrosion should be assumed and inspection methods should be implemented to detect such corrosion. Clarify whether any inspection procedures in addition to the ASME Code will be implemented to inspect the shell assembly, including transition cone, in the ANO-2 steam generators for pitting and general corrosion.

Applicant's Response

The rules of Section XI of the ASME Code require a volumetric examination of one upper shell-to-transition cone weld during each 10-year inspection interval. However, Information Notice 90-04 states that if general corrosion pitting of the steam generator shell is known to exist, the requirements of Section XI of the ASME Code may not be sufficient to differentiate isolated cracks from inherent geometric conditions. IN 90-04 indicates that the degradation probably results from corrosion-assisted thermal fatigue due to relatively cold water impinging upon the weld region during reactor trips from full power and certain transient operations.

Localized corrosion is heavily dependent on contaminants for initiation and propagation. The ANO-2 Water Chemistry Control Program controls these contaminants which precludes localized corrosion. The program relies on monitoring and control of water chemistry based on the Electric Power Research Institute (EPRI) guidelines in TR-102134 for secondary water chemistry. In addition, the shell-to-transition cone welds in the ANO-2 replacement steam generators have very low cyclic stress (thermal fatigue) levels (cumulative usage factor = 0.15). The ANO-2 replacement steam generators were installed in 2000 with a design life extending to 2040, which is beyond the period of extended operation ending in 2038. Therefore, the corrosion mechanisms described in IN 90-04 are not applicable to the ANO-2 replacement steam generators due to control of water chemistry. No additional inspections are required for the shell-to-transition cone weld for the period of extended operation.

Status

The staff indicated that no additional information was required at this time.

RAI 3.1.1-3

For Item 3.1.1-21, the applicant states that the feedwater ring discussed in generic aging lessons learned (e.g., Generic Aging Lessons Learned (GALL) Section IV.D1.3-a) is applicable to Combustion Engineering System 80 steam generators and is not applicable to the Westinghouse steam generators at ANO-2. However, the staff understands that the ANO-2 steam generators do have a feedwater ring and fittings which have a potential for degradation under adverse operating conditions. Justify why these components are not included in the scope of the license renewal and not subject to aging management.

Applicant's Response

The internal feedwater distribution rings are within the scope of license renewal but are not subject to aging management review since they do not support any intended function of the steam generators. There are no design bases events or regulated events at ANO-2 that rely on

the steam generator feedwater ring to demonstrate successful mitigation and recovery from the event. Please refer to the response to RAI 2.3.1.5-1.

Staff's Comment

The staff stated that the potential for degradation of the feedwater ring exists and needs to be managed through some type of inspection program.

Status

The applicant agreed to revise and submit its response to reflect the visual inspection of the feedwater distribution ring and J-nozzles.

Question B.1.30.1-6

In the LRA SAR Section A.2.1.31, the applicant needs to reference specific industry guidance for the Auxiliary System Water Chemistry Program similar to NUREG-1800, Table 3.3-2 (page 3.3-17) and Table 3.1-2 (page 3.1-23), or, justify not including industry guidance in the LRA Section A.2.1.31.

Applicant's Response

A reference to industry guidance used for the Auxiliary Systems Water Chemistry Control Program will be provided in LRA SAR Section A.2.1.31.

Status

The applicant agreed to revise its response to include the reference and submit it formally.

Question 3.1.1-5

The staff noted that the applicant is crediting system leakage testing for ANO-2 RCS piping of 1-inch NPS or less in lieu of the one-time inspection. On the basis of past reviews, this alternative of system leakage testing as an inspection technique is unacceptable. The project team requests the applicant to provide an alternate means of managing crack initiation and growth for RCS small bore piping of 1-inch NPS or less.

Applicant's Response

For small bore piping (> 1") the chemistry program is the primary aging management program. No volumetric inspection for 1" and smaller piping is conducted. As part of the ANO-2 Inservice Inspection Program, visual inspection of the 1-inch and smaller piping, in conjunction with volumetric examination of larger piping of the same material, adequately manages the effects of aging prior to the loss of function. This approach is consistent with that for ANO-1.

Status

The applicant agreed to submit the response formally.

Arkansas Nuclear One, Unit 2

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