Entergy

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2CAN120403

December 9, 2004

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

Subject: License Renewal Application Draft Safety Evaluation Report Comments
TAC No. MB8402
Arkansas Nuclear One – Unit 2
Docket No. 50-368
License No. NPF-6

Dear Sir or Madam:

By letter dated November 5, 2004 (2CNA110401), the NRC issued the draft safety evaluation report (DSER) related to license renewal of Arkansas Nuclear One, Unit 2 (ANO-2). The purpose of this submittal is to document Entergy's comments to date on the DSER. Also, during the weeks of November 1 and 15, 2004, the NRC performed an inspection of the ANO-2 aging management programs credited for license renewal. This submittal also documents commitments made during the inspection.

- In section 3.6.2.3.1.1 (page 3-318) the phase bus is also exposed to an inside environment of heat and air in addition to an outside environment.

- Under Parameters Monitored and Detection of Aging Effects, Section 3.0.3.3.3 (pages 3-56 and 3-57) states for the Heat Exchanger Monitoring Program that the applicant has developed a testing method, similar to eddy current. Entergy did not develop this method. The DSER needs to be revised to state that the applicant has identified a testing method, similar to eddy current testing as stated in the referenced request for additional information (RAI) response.

- Section 3.3.2.2.1 (page 3-185) states, "The Water Chemistry Control Program provides for the inspection of systems when they are opened for maintenance, which addresses the verification program recommendation in the Generic Aging Lessons Learned (GALL) Report." The DSER needs to be revised to state that past chemistry, maintenance, and inservice inspections, combined with future anticipated inspections, confirm the effectiveness of the water chemistry control program and address the verification program recommended in the GALL report as stated in the applicant's response to RAI 3.3-2. The response to RAI 3.3-2 provided in a letter

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dated September 23, 2004 (2CAN090403) stated, "In addition, as the plant ages, maintenance activities are not expected to decline. It is reasonable to assume that maintenance history is representative of future numbers and diverse locations of anticipated maintenance and inspection activities. Therefore, past chemistry, maintenance, and inservice inspections, combined with future anticipated inspections, constitute an adequate sample size to verify that the water chemistry control programs are managing aging effects so that intended functions will be maintained during the period of extended operation." This discussion is correctly reflected in section 3.3.2.3.0 of the draft SER under Chemistry Control Programs and Verification Inspections. This same comment also applies in section 3.3.2.2.9 in the last two paragraphs where it is implied that the water chemistry control program provides for future inspections and in section 3.4.2.2.2 as described in the sixth bullet below.

- In section 3.3.2.2.5 (page 3-188) the second paragraph states that the applicant credited the Wall Thinning Monitoring Program (B.1.29) for managing loss of material from the external surfaces of the emergency diesel generator and alternate AC diesel generator system. This should be internal surfaces.

- In section 3.3.2.3.2 (page 3-208) under aging management programs and 3.4.2.2.3 (page 3-265) under Staff evaluation it states that the applicant treated the lubricating oil with biocides to limit the presence of microbiological organisms and, therefore, microbiologically influenced corrosion (MIC) has not been a concern. Entergy doesn't treat lube oil with biocides. It is maintained free of contaminants and water such that MIC is not a concern. The DSER needs to be revised to correct this.

- In section 3.4.2.2.2 (page 3-251) the following statement is made: Rather, the applicant credited the Periodic Surveillance and Preventive Maintenance Program (PSPM) with determining the effectiveness of the Secondary Water Chemistry Control Program. This is not true (reference the third bullet above). Also this evaluation of primary and secondary water chemistry does not reference any of RAI 3.3-2 that verified the effectiveness of all water chemistry programs. Lastly, in this section the program should be referred to as the Primary and Secondary Water Chemistry Control Program not just secondary water chemistry control program in order to be consistent with the LRA program name.

- In response to a question raised during the regional inspection, the chemistry procedure and engineering report will be revised to address loss of the passive layer if chemistry limits are out of specification for an extended period.

- In response to a question raised during the regional inspection, the PSPM Program will be revised to include an inspection of the alternate AC diesel generator starting air tank.

New commitments contained in this submittal are summarized in the attachment. Should you have any questions concerning this submittal, please contact Ms. Natalie Mosher at (479) 858-4635.

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

Sincerely,

Dale E. James
Manager, Licensing

DEJ/nbm

Attachment

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Attachment to

2CAN120403

List of Regulatory Commitments

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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	
The chemistry procedure and engineering report will be revised to address loss of the passive layer if chemistry limits are out of specification for an extended period.		X	Prior to entering the period of extended operation
The PSPM Program will be revised to include an inspection of the alternate AC diesel generator starting air tank.		X	Prior to entering the period of extended operation