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F. G. Burford Acting Director Nuclear Safety & Licensing

CNRO-2004-00081

December 17, 2004

U. S. Nuclear Regulatory Commission

Attn.: Document Control Desk Washington, DC 20555-0001

SUBJECT: Supplement to Amendment Request,

Request for Use of Delta Protection, Supplied Air Suits

River Bend Station Grand Gulf Nuclear Station, Unit 1
Docket No. 50-458 Docket No. 50-416
License No. NPF-47 License No. NPF-29

Arkansas Nuclear One

Units 1 & 2

Docket Nos. 50-313 & 50-368 License Nos. DPR-51 & NPF-6 Waterford Steam Electric Station, Unit 3

Docket No. 50-382 License No. NPF-38

Reference:

Entergy Operations letter to NRC, "Request for Use of Delta Protection,

Supplied Air Suits" dated December 9, 2004

Dear Sir or Madam:

By the referenced letter, Entergy Operations, Inc. (Entergy) proposed the use of a Delta Protection suit that has not received National Institute for Occupational Safety and Health (NIOSH) approval for use as a respirator in the United States.

On December 16, 2004, Entergy and members of your staff held a call to discuss approval of the use of these suits. As a result of the call, two questions were determined to need formal response. Entergy's response is contained in Attachment 1.

There are no technical changes proposed. The original no significant hazards consideration included in Reference 1 is not affected by any information contained in the supplemental letter.

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Entergy has summarized new commitments related to this request in Attachment 2.

Should you have any questions regarding this submittal, please contact Bill Brice at (601) 368-5076.

Very truly yours,

FGB/WBB/bal

Attachments:

- 1. Response to Request for Additional Information Related to Approval Request for Delta Protection Mururoa Enclosed Suits
- 2. List of Regulatory Commitments

cc: Mr. W. A. Eaton (ECH)

Mr. J. P. DeRoy (ECH)

Mr. J. S. Forbes (ANO)

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U. S. Nuclear Regulatory Commission

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Attn: Mr. Bhalchandra Vaidya MS O-7D1

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Attn: Mr. Thomas W. Alexion

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Attn: Mr. Drew Holland

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> U.S. Nuclear Regulatory Commission Attn: Mr. Nageswaran Kalyanam MS O-7D1 Washington, DC 20555-0001

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ATTACHMENT 1

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Response to Request for Additional Information Related to Approval Request for Delta Protection Mururoa Enclosed Suits

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Response to Request for Additional Information Related to Approval Request for Delta Protection Mururoa Enclosed Suits

Question 1:

While the licensee has established a useful communication with the vendor for suit improvements and lessons learned from other users, it is vital that the vendor establish and alert each product user (licensee) to any significant problems or deficiencies with the suit, similar to the warning/alert system required by the National Institute for Occupational Safety and Health (NIOSH) in the United States. Verify that Entergy has committed to timely reporting of any defects experienced with these suits to the manufacturer and other U.S. users.

Response 1:

Entergy will report any defects of these suits in a timely manner to the United States nuclear industry through our Operating Experience process and to the manufacturer prior to use of the suits.

Question 2:

While the licensee committed to use the manufacturer's information in developing implementing procedures (and training lesson plans) for using the suits, please identify any of the manufacturer's "instructions for donning and removal," "instructions for use" and "emergency features" technical information/directions provided, that will not be required by procedures. For each instruction identified, explain the rationale for not including it in the program's procedures/training (and any other compensating actions).

Response 2:

Entergy will include all instructions for use and emergency features (see attachment to the original submittal) supplied by the manufacturer in our procedures/training. These instructions discuss the emergency features. The manufacturer's representative was contacted and he indicated that the "Instructions for Donning and Removal" were no longer supplied because the "Instructions for Use" were adequate.

ATTACHMENT 2

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List of Regulatory Commitments

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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.

	TYPE (Check one)		SCHEDULED
COMMITMENT	ONE- TIME ACTION	CONTINUING COMPLIANCE	COMPLETION DATE (If Required)
Entergy will report any defects of these suits in a timely manner to the United States nuclear industry through our Operating Experience process and to the manufacturer prior to use of the suits.		х	When defects are found
Entergy will include all instructions for use and emergency features supplied by the manufacturer in our procedures/training.		х	Before use of Mururoa suit