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2CAN120404

December 20, 2004

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

SUBJECT: License Amendment Request
Application for Technical Specification Improvement to Eliminate
Requirements to Provide Monthly Operating Reports and Occupational
Radiation Exposure Reports
Arkansas Nuclear One, Unit 2
Docket No. 50-368
License No. NPF-6

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests the following amendment for Arkansas Nuclear One, Unit 2 (ANO-2).

The proposed amendment would delete the Technical Specification (TS) requirements to submit monthly operating reports and occupational radiation exposure reports. The change is consistent with NRC-approved Revision 1 to Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004, as part of the Consolidated Line Item Improvement Process (CLIIP).

Attachment 1 provides a description of the proposed change and confirmation of applicability. Attachment 2 provides the existing TS pages marked-up to show the proposed change.

The proposed change includes a new commitment as summarized in Attachment 3.

In accordance with 10 CFR 50.91(a)(1), a copy of this application, with enclosures, is being provided to the designated Arkansas State Official.

Entergy requests approval of the proposed license amendment by April 30, 2005, with the amendment being implemented within 90 days of approval. Although this request is neither exigent nor emergency, your prompt review is requested.

If you have any questions or require additional information, please contact David Bice at 479-858-5338.

A001

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 20, 2004.

Sincerely,



JSF/dbb

Attachments:

1. Analysis of Proposed Technical Specification Change
2. Proposed Technical Specification Changes (mark-up)
3. List of Regulatory Commitments

cc: Dr. Bruce S. Mallett
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U. S. Nuclear Regulatory Commission
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U. S. Nuclear Regulatory Commission
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Little Rock, AR 72205

Attachment 1

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Analysis of Proposed Technical Specification Change

1.0 INTRODUCTION

This letter is a request to amend Operating License NPF-6 for Arkansas Nuclear One – Unit 2 (ANO-2).

The proposed license amendment deletes the requirements in Technical Specification (TS) 6.6.1 for an annual report on occupational radiation exposures and TS 6.6.4 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC approved Industry Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this technical specification improvement was announced in the Federal Register on June 23, 2004, as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

TS 6.6.1	Occupational Radiation Exposure Report	Deleted
TS 6.6.4	Monthly Operating Reports	Deleted

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF -369.

5.0 TECHNICAL ANALYSIS

Entergy has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. Entergy has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to ANO-2 and justify this amendment for the incorporation of the changes to the ANO-2 TS.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

6.1 Verification and Commitments

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, Entergy is making the following verifications and regulatory commitment:

1. Entergy is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).
2. ANO does not have different reactor types or both operating and shutdown reactors.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

Entergy has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the Consolidated Line Item Improvement Program (CLIIP). Entergy has concluded that the proposed determination presented in the notice is applicable to Arkansas Nuclear One – Unit 2 (ANO-2) and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

Entergy has reviewed the environmental evaluation included in the model Safety Evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIIP. Entergy has concluded that the staff's findings presented in that evaluation are applicable to ANO-2 and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENCE

This application is being made in accordance with the CLIIP. Entergy is not proposing variations or deviations from the TS changes described in TSTF-369 (and the limited portion of TSTF-258) or the NRC staff's model SE published on June 23, 2004 (69 FR 35067).

10.0 REFERENCES

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004, (69 FR 35067).

Attachment 2

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Proposed Technical Specification Changes (mark-up)

ADMINISTRATIVE CONTROLS

6.6 REPORTING REQUIREMENTS

6.6.1 Occupational Radiation Exposure Report

(Note: A single submittal may be made for ANO. The submittal should combine sections common to both units.)

~~A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions, (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year. DELETED~~

6.6.2 Annual Radiological Environmental Operating Report

(Note: A single submittal may be made for ANO. The submittal should combine sections common to both units.)

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

ADMINISTRATIVE CONTROLS

6.6.3 Radioactive Effluent Release Report

(Note: A single submittal may be made for ANO. The submittal shall combine sections common to both units. The submittal shall specify the releases of radioactive material from each unit.)

The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

6.6.4 Monthly Operating Reports

~~Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~ DELETED

6.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining part of a reload cycle, and shall be documented in the COLR for the following:
 - 3.1.1.1 Shutdown Margin – $T_{avg} > 200^{\circ}\text{F}$
 - 3.1.1.2 Shutdown Margin - $T_{avg} \leq 200^{\circ}\text{F}$
 - 3.1.1.4 Moderator Temperature Coefficient
 - 3.1.3.1 CEA Position
 - 3.1.3.6 Regulating and Group P CEA Insertion Limits
 - 3.2.1 Linear Heat Rate
 - 3.2.3 Azimuthal Power – T_q
 - 3.2.4 DNBR Margin
 - 3.2.7 Axial Shape Index

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
 - 1) "The ROCS and DIT Computer Codes for Nuclear Design", CENPD-266-P-A, April 1983 (Methodology for Specifications 3.1.1.1 and 3.1.1.2 for Shutdown Margins, 3.1.1.4 for MTC, 3.1.3.6 for Regulating and Group P CEA Insertion Limits, and 3.2.4.b for DNBR Margin).
 - 2) "CE Method for Control Element Assembly Ejection Analysis," CENPD-0190-A, January 1976 (Methodology for Specification 3.1.3.6 for Regulating and Group P CEA Insertion Limits and 3.2.3 for Azimuthal Power Tilt).

Attachment 3

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List of Regulatory Commitments

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.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Entergy is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment is based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).		X	Within 90 days of amendment issuance.