



Entergy Operations, Inc.
1448 S.R. 333
Russellville, AR 72802
Tel 479-858-4888

2CAN030503

March 8, 2005

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

SUBJECT: Supplemental to Amendment Request
For Shutdown Cooling Automatic Closure Interlock Removal
Arkansas Nuclear One, Unit 2
Docket No. 50-368
License No. NPF-6

REFERENCES: 1. Entergy letter to the NRC dated July 8, 2004, "Shutdown Cooling Automatic Closure Interlock Removal" (2CAN070401)
2. Entergy letter to the NRC dated February 2, 2005, "Supplement to Amendment Request For Shutdown Cooling Automatic Closure Interlock Removal" (2CAN020503)

Dear Sir or Madam:

By letters (Reference 1 and 2), Entergy Operations, Inc. (Entergy) proposed a change to the Arkansas Nuclear One, Unit 2 (ANO-2) Technical Specifications (TSs) in support of removing the automatic closure interlock (ACI) associated with the Shutdown Cooling (SDC) system suction motor-operated valves.

Entergy was notified by your staff on March 8, 2005, of a request to reduce the maximum allowable setpoint for the SDC open permissive interlock (OPI) function from 445 to 400 psia. Entergy has agreed to this request and has included a revised markup of the proposed OPI surveillance in Attachment 2. A discussion of this revision is included in Attachment 1.

The change in OPI setpoint is conservative in nature. The original no significant hazards consideration included in Reference 1 is not affected by any information contained in this supplemental letter. Furthermore, the commitments contained in Reference 1 remain unaltered.

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

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I declare under penalty of perjury that the foregoing is true and correct. Executed on March 8, 2005.

Sincerely,

*Robert Holenfield
for Dale James.*

Dale E. James
Acting Director, Nuclear Safety Assurance

RLH/dbb

Attachments:

1. Response to Request for Additional Information
2. Proposed Technical Specification Changes (mark-up)

cc: Dr. Bruce S. Mallett
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

NRC Senior Resident Inspector
Arkansas Nuclear One
P. O. Box 310
London, AR 72847

U. S. Nuclear Regulatory Commission
Attn: Mr. Drew Holland
MS O-7 D1
Washington, DC 20555-0001

Mr. Bernard R. Bevill
Director Division of Radiation
Control and Emergency Management
Arkansas Department of Health
4815 West Markham Street
Little Rock, AR 72205

Attachment 1

To

2CAN030503

Response to Request for Additional Information

**Response to Request for Additional Information Related to
License Amendment in Support of Shutdown Cooling
Automatic Closure Interlock Removal**

Question 1:

It appears that the proposed TS surveillance requirement 4.5.2.d.1 for the open permissive function provides no margin to the LTOP relief setpoint. Please justify the reason for selecting this setpoint or propose a reduced setpoint as appropriate.

Response 1:

As a result of several telephone conversations with one or more members of the NRC staff, Entergy Operations, Inc. (Entergy) has agreed to reduce the Open Permissive Interlock (OPI) function setpoint to 400 psia. Although the previous proposal of 445 psia did not present a significant safety concern, Entergy agrees that choosing a setpoint below the Low Temperature Overpressure (LTOP) relief valve setpoints is appropriate. Attachment 2 provides a new markup of the affected Technical Specification (TS) page.

Attachment 2

To

2CAN030503

Proposed Technical Specification Changes (mark-up)

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS

4.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the following valves are in the indicated positions with power to the valve operators removed:

Valve Number	Valve Function	Valve Position
2CV-5101	HPSI Hot Leg Injection Isolation	Closed
2CV-5102	HPSI Hot Leg Injection Isolation	Closed
2BS26	RWT Return Line	Open

- b. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- c. By a visual inspection which verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment which could be transported to the containment sump and cause restriction of the pump suction during LOCA conditions. This visual inspection shall be performed:
1. For all accessible areas of the containment prior to establishing CONTAINMENT INTEGRITY, and
 2. At least once daily of the areas affected within containment if containment has been entered that day, and during the final entry when CONTAINMENT INTEGRITY is established.
- d. At least once per 18 months by:
1. Verifying ~~Shutdown Cooling System open permissive automatic isolation and interlock prevents the valves from being opened action of the shutdown cooling system from the Reactor Coolant System with a simulated or actual~~ when the Reactor Coolant System pressure ~~signals~~ is above ≥ 400300 psia.
 2. A visual inspection of the containment sump and verifying that the subsystem suction inlets are not restricted by debris and that the sump components (trash racks, screens, etc.) show no evidence of structural distress or corrosion.
- e. At least once per 18 months, during shutdown, by:
1. Verifying that each automatic valve in the flow path actuates to its correct position on SIAS and RAS test signals.
 2. Verifying that each of the following pumps start automatically upon receipt of a Safety Injection Actuation Test Signal:
 - a. High-Pressure Safety Injection pump.
 - b. Low-Pressure Safety Injection pump.