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Dale E. James
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2CAN040504

April 26, 2005

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

SUBJECT: License Amendment Request
Response to Request for Additional Information Regarding Proposed
Technical Specification Change on Containment Structural Integrity
Arkansas Nuclear One, Unit 2
Docket No. 50-368
License No. NPF-6

REFERENCE: 1 Letter from Entergy to NRC dated December 20, 2004, *Proposed
Technical Specification Changes Revising Containment Building
Structural Integrity Requirements* (2CAN120401)

Dear Sir or Madam:

In Reference 1 Entergy proposed Technical Specification (TS) changes revising the requirements associated with Arkansas Nuclear One, Unit 2 (ANO-2) provisions for containment building integrity. The proposed changes specifically modify the containment structures and tendon inservice inspection requirements to be consistent with NUREG-1432 and ASME Code, Section IWL. On April 6, 2005, Entergy received an NRC Request for Additional Information (RAI) on the proposed license amendment. During a call between the NRC Staff and Entergy on April 13, 2005, the proposed response was discussed and agreed upon. Attachment 1 provides the Entergy response to the RAI and Attachment 2 provides a mark-up of revised TS page 6-6.

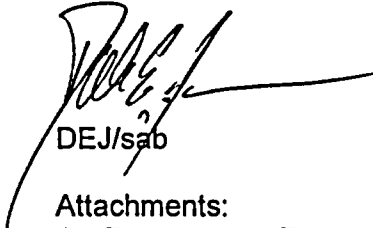
The no significant hazards considerations contained in Reference 1 is unaffected by this change. There are no commitments being made as a result of this request.

If you have any questions or require additional information, please contact Steve Bennett at 479-858-4626.

AD47

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 26, 2005.

Sincerely,



DEJ/sab

Attachments:

1. Response to Request for Additional Information Regarding Proposed Technical Specification Change on Containment Structural Integrity
2. Proposed Technical Specification Changes (mark-up)

cc: Dr. Bruce S. Mallett
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U. S. Nuclear Regulatory Commission
Region IV
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U. S. Nuclear Regulatory Commission
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Mr. Bernard R. Bevill
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Attachment 1

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**Response to Request for Additional Information Regarding Proposed
Technical Specification Change on Containment Structural Integrity**

Response to Request for Additional Information Regarding Proposed Technical Specification Change on Containment Structural Integrity

1. *In its submittal, the licensee stated that the proposed changes to the technical specifications met the intent of Section 5.5.6 of NUREG-1432 "Standard Technical Specifications Combustion Engineering Plants," however, with certain changes. In its request (bullet 3, item 2 on page 1 of Attachment 1) the licensee stated that it deleted the sentence in Section 5.5.6 of NUREG-1432, related to the program provisions to include baseline measurements prior to initial operations. Also, the licensee stated that this statement is no longer applicable to ANO-2 containment inspections; however, it didn't explained the basis for the statement. Recording of the baseline measurements of prestressing forces has been required for all prestressed concrete containments. The licensee is requested to provide justification for deleting this requirement.*

ANO-2 Response:

The statement that was not included in the ANO-2 proposed TS 6.5.6 was "The program shall include baseline measurements prior to initial operations." The purpose of this statement was believed by Entergy to be applicable to new facilities that are planning to conduct initial containment inspections and not with regard to data analysis. Baseline measurements were conducted prior to initial operations and continue to be used as data points in the ANO-2 Containment Tendon Surveillance Program. However, in further discussion with the NRC Staff, the NRC's objective for including this into the TSs is to ensure that the initial operational data is used in establishing ongoing containment integrity determinations.

Therefore, Entergy is revising TS Section 6.5.6 to include modified wording from NUREG-1432. The NUREG-1432 wording is being changed from "The program shall include baseline measurements prior to initial operations" to "The program shall include the use of baseline measurements from initial operation."

The revised mark-up of TS page 6-6 is contained in Attachment 2.

Attachment 2

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Proposed Technical Specification Changes (mark-up)

ADMINISTRATIVE CONTROLS

6.5.4 Radioactive Effluent Controls Program (continued)

- e. Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days.
- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary conforming to the dose associated with 10 CFR 20, Appendix B, Table II, Column 1;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC beyond the site boundary due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

The provisions of SR 4.0.2 and SR 4.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

6.5.5 Component Cyclic or Transient Limit Program

This program provides controls to track the SAR Section 5.2.1.5, cyclic and transient occurrences to ensure that components are maintained within the design limits.

6.5.6 ~~not used~~ Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in prestressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include the use of baseline measurements from initial operation. The Containment Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with the ASME Code, Section XI, Subsection IWL and 10 CFR 50.55a.

The provisions of SR 4.0.3 are applicable to the Containment Tendon Surveillance Program inspection frequencies.