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Thomas A. Marlow
Director
Nuclear Safety Assurance

OCAN030602

March 20, 2006

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

Subject: License Amendment Request
Supplemental to Emergency Cooling Pond Inspection and Inventory Requirements
Arkansas Nuclear One - Unit 1 and Unit 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6

REFERENCE: 1. Entergy Letter to the NRC dated October 25, 2005, License
Amendment Request for Emergency Cooling Pond Inspection and
Inventory Requirements (OCAN100503)

Dear Sir or Madam:

By letter (Reference 1), Entergy Operations, Inc. (Entergy) proposed a change to the Technical Specifications (TS) for Arkansas Nuclear One, Unit-1 (ANO-1) and Unit 2 (ANO-2). The proposed change modifies inventory and inspection requirements associated with the Emergency Cooling Pond (ECP). Limiting Conditions for Operation (LCO) 3.7.8 and 3.7.4.1 (ANO-1 and ANO-2, respectively), "Emergency Cooling Pond," and their associated Actions and Surveillance Requirements (SR) are affected by the proposed change.

On March 15, 2006, Entergy was notified by the members of your staff of a request to modify the proposed wording of TS SR 3.7.8.1 and 4.7.4.1.a (ANO-1 and ANO-2, respectively). These SRs ensure that sufficient water volume is maintained in the ECP at all times during the modes of applicability. Subsequent to this notification, Entergy and members of your staff reached agreement on revised wording for the affected SRs. The revised wording is included in marked-up TS pages contained in Attachment 1 of this letter for both ANO-1 and ANO-2. The corresponding pages of the original transmittal (Reference 1) should be removed and replaced with the pages attached.

The revised wording provides enhanced clarity and involves no technical change to the requirements as originally proposed. Therefore, the original no significant hazards consideration included in Reference 1 is not affected by any information contained in this supplemental letter.

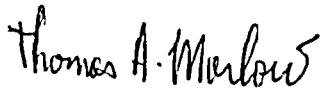
This letter contains no new commitments.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 20, 2006.

Very truly yours,



TAM/dbb

Attachment: Proposed Technical Specification Changes (markup)

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 G. Holland
MS O-7D1
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

OCAN30602

Proposed Technical Specification Changes (mark-up)

3.7 PLANT SYSTEMS

3.7.8 Emergency Cooling Pond (ECP)

LCO 3.7.8 The ECP shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<u>A. Degradation of the ECP noted pursuant to SR 3.7.8.4 below or by other inspection.</u>	A.1 <u>Determine ECP remains acceptable for continued operation.</u>	<u>7 days</u>
<u>BA. Required Action and associated Completion Time of Condition A not met ECP inoperable.</u> <u>OR</u> <u>LCO not met for reasons other than Condition A.</u>	<u>BA.1 Be in MODE 3.</u> <u>AND</u> <u>BA.2 Be in MODE 5.</u>	<u>6 hours</u> <u>36 hours</u>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.8.1 <u>Verify that the indicated water level of the ECP is greater than or equal to that required for an ECP volume of \geq 705 acre-ft.</u>	24 hours
SR 3.7.8.2 -----NOTE----- Only required to be performed from June 1 through September 30. ----- Verify average water temperature is \leq 100°F.	24 hours

<u>SURVEILLANCE</u>		<u>FREQUENCY</u>
SR 3.7.8.3	<p><u>Perform soundings of the ECP to vVerify:</u></p> <ol style="list-style-type: none"> 1. <u>A contained water volume of ECP \geq 70 acre-feet at water level of 5 ft., and</u> 2. <u>The minimum indicated water level needed to ensure a volume of 70 acre-feet is maintained.</u> 	12 months
SR 3.7.8.4	<p>Verify earth portions of stone covered embankments and spillway of ECP; Perform visual inspection of the ECP to verify conformance with design requirements.</p> <ol style="list-style-type: none"> a. Have not been eroded or undercut by wave action, and b. Do not show apparent changes in visual appearance or other abnormal degradation from as-built condition. 	12 months

PLANT SYSTEMS

3/4.7.4 EMERGENCY COOLING POND

LIMITING CONDITION FOR OPERATION

3.7.4.1 The emergency cooling pond (ECP) shall be OPERABLE with:

- a. A minimum contained water volume of 70 acre-feet (~~equivalent to an indicated water level of 5 feet~~).
- b. An average water temperature of $\leq 100^{\circ}\text{F}$.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With the volume and/or temperature requirements of the above specification not satisfied or, with the requirements of Action b not met, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. If degradation is noted pursuant to 4.7.4.1.d below or by other inspection, perform an evaluation to determine that the ECP remains acceptable for continued operation within 7 days.

SURVEILLANCE REQUIREMENTS

4.7.4.1 The ~~ECP~~ emergency cooling pond shall be determined OPERABLE:

- a. At least once per 24 hours by verifying that the pond's indicated water level of the ECP is greater than or equal to that required for an ECP volume of ≥ 70 5 acre-feet.
- b. At least once per 24 hours during the period of June 1 through September 30 by verifying that the pond's average water temperature at the point of discharge from the pond is within its limit.
- c. At least once per 12 months by making soundings of the pond and verifying: ~~an average depth of 5 feet and that the contained water volume of the pond is within its limit.~~
 1. A contained water volume of ECP ≥ 70 acre-feet, and
 2. The minimum indicated water level needed to ensure a volume of 70 acre-feet is maintained.
- d. At least once per 12 months by performance of a visual inspection of the loose stone (riprap) placed on the banks of the pond and of the concrete slab spillway and verifying that the earth portions of the stone covered embankments and the spillway ~~ECP to verify conformance with design requirements:~~
 1. ~~Have not been eroded or undercut by wave action, and~~
 2. ~~Do not show apparent changes in visual appearance or other abnormal degradation from their as-built condition.~~