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Director,  
Nuclear Safety Assurance

0CAN020701

February 14, 2007

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

*Designated  
Original*

SUBJECT: Supplemental Response to GL 2003-01 Regarding Control Room Habitability  
Arkansas Nuclear One, Units 1 and 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6

- REFERENCES
- 1 NRC letter dated June 12, 2003, *Generic Letter 2003-01, Control Room Habitability* (0CNA060308)
  - 2 Entergy letter dated August 28, 2003, *Response to Generic Letter 2003-01* (0CAN080304)
  - 3 Entergy letter dated June 24, 2004, *Proposed Operating License Amendment for Revised ANO-1 Control Room Habitability Analysis* (1CAN060401)
  - 4 Entergy letter dated May 6, 2006, *Withdrawal of Proposed Operating License Amendment for Revised ANO-1 Control Room Habitability Analysis* (1CAN050601)
  - 5 Federal Register Notice dated January 17, 2007, *Notice of Availability of Technical Specification Improvement To Modify Requirements Regarding Control Room Envelope Habitability Using the Consolidated Line Item Improvement Process* (FRN Federal Register, Vol. 72, No. 10, page 2022)

Dear Sir or Madam:

On June 12, 2003, the NRC issued Generic Letter (GL) 2003-01 (Reference 1). Entergy submitted the response to the generic letter for Arkansas Nuclear One, Unit 1 (ANO-1) and Unit 2 (ANO-2) on August 28, 2003 (Reference 2). As discussed in our response, the ANO-1 and ANO-2 control rooms share a common control room envelope (CRE). Based on CRE testing conducted in 2001, the ANO-1 CRE unfiltered inleakage value was in excess of the analytical dose acceptance limits. Therefore, compensatory measures to reduce doses to the control room operators to within General Design Criterion (GDC) 19 limits were established through the use of potassium iodide in the event of an accident.

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*Proven per PM  
3/2/07*

In Reference 2, Entergy had also committed to submit revised dose calculations to eliminate these compensatory actions for compliance with GDC 19. On June 24, 2004, Entergy submitted a proposed license amendment using the guidance of Regulatory Guide 1.195 to increase the allowed radiological unfiltered in-leakage into the control room (Reference 3). As discussed in our response to the generic letter, Entergy used an approach consistent with the ANO-1's licensing basis for the maximum hypothetical accident. However, based on subsequent discussions with the NRC staff, Entergy withdrew the license amendment and stated that we would pursue alternate means for providing margin to the tested inleakage values for compliance with GDC 19.

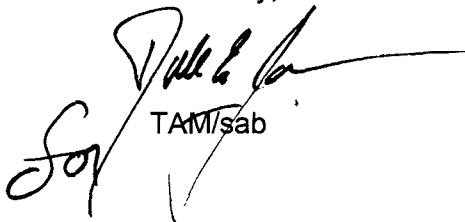
Entergy has subsequently elected to pursue an alternate source term (AST) methodology approach to increase the allowed inleakage analytical limits for both units. Even though the control room measured inleakage is within the ANO-2 GDC 19 radiological analysis, additional margin is desirable for future inleakage testing. Entergy is in the process of final contract development for performing the AST analysis. The schedule for completion of the AST analyses is being staggered, with ANO-1 being completed in September 2007, while the ANO-2 analysis will be completed in 2008. Therefore, based on the current schedule for completion of the ANO-1 AST analysis, Entergy is committing to submit a proposed license amendment for ANO-1 using AST methodologies by October 31, 2007.

Additionally in response to GL 2003-01, Entergy committed to submit a proposed license amendment consistent with the NRC approved guidance of Technical Specification Task Force (TSTF)-448 within six months of its availability under the Consolidated Line Item Improvement Process (CLIIP). On January 17, 2007, the NRC issued a notice in the Federal Register (Reference 5) regarding the availability of TSTF-448, Revision 3, as a CLIIP. Therefore, under our current committed schedule, Entergy would be required to submit a license amendment by mid-July, 2007. However, under the new TSTF-448 requirements, a control room envelope which has been discovered to be in noncompliance to its GDC 19 analytical dose acceptance criteria would be required to shutdown the unit within 90 days. To avoid this condition, Entergy will need to defer our commitment and request NRC approval for both the TSTF-448 and the ANO-1 AST based license amendments on a corresponding schedule. Additionally, since the ANO-1 and ANO-2 control rooms share a common envelope, implementation of TSTF-448 for ANO-2 will need to be implemented on the same schedule as ANO-1. Therefore, Entergy will submit license amendment requests for the adoption of TSTF-448 for both ANO units concurrent with the AST license amendment request for ANO-1. Since ANO-2 control room meets its design basis allowable inleakage, the ANO-2 AST license amendment can be processed on a schedule separate from the other proposed license amendments.

Commitments being made for this supplemental response to GL 2003-01 are contained in the attachment to this letter. These revised commitments and schedules were discussed with the NRC staff during a conference call on January 26, 2007. If you have any questions or require additional information, please contact Steve Bennett at 479-858-4626.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 14, 2007.

Sincerely,



TAMI/sab

Attachment: List of Regulatory Commitments

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  
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London, AR 72847

U. S. Nuclear Regulatory Commission  
Attn: Ms. Farideh Saba  
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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 to**

**OCAN020701**

**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 will submit a proposed license amendment for ANO-1 using alternate source term methodologies to eliminate the existing control room envelope compensatory measures	X		By October 31, 2007
Entergy will submit proposed license amendments for ANO-1 and ANO-2 in accordance with TSTF-448, Revision 3	X		By October 31, 2007