

July 9, 2008

Vice President, Operations
Arkansas Nuclear One
Entergy Operations, Inc.
1448 S.R. 333
Russellville, AR 72802

SUBJECT: ARKANSAS NUCLEAR ONE, UNIT NO. 1 - REGARDING: REQUEST TO
USE CODE CASE N-716 (TAC NO. MD8917)

Dear Sir or Madame:

By letter dated May 30, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML08155021), Entergy Operations, Inc. (Entergy, the licensee) submitted Request to Use Code Case N-716 for relief from certain requirements of Section XI of the American Society of Mechanical Engineers (ASME Code). The request for alternative proposes a risk-informed (RI) selection and examination program as an alternative to a portion of its current inservice inspection (ISI) program for Arkansas Nuclear One, Unit No. 1 (ANO-1), on the basis that the alternative provides an acceptable level of quality and safety. Entergy requests to implement an RI-ISI program based on ASME Code Case N-716, *Alternative Piping Classification and Examination Requirements, Section XI Division 1*, April 19, 2006. Review of proposed RI-ISI programs is performed in accordance with Regulatory Guide (RG) 1.178, *An Approach for Plant-Specific Risk-Informed Decisionmaking for Inservice Inspection of Piping*. RG 1.178 states that, when completed, Draft Guide (DG)-1122, *An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities* will provide guidance on determining the quality of the PRA that is sufficient to provide confidence in the results such that they can be used in regulatory decision-making for light-water reactors. DG-1122 was issued as RG 1.200, Revision 1, in January 2005. As clarified in the Regulatory Issue Summary 2007-06, *Regulatory Guide 1.200 Implementation*, issued March 22, 2007, the NRC staff will use Revision 1 of RG 1.200 to assess technical adequacy for all risk-informed applications received after December 2007.

Pursuant to Sections 50.55a(a)(3)(i) and 50.55a(a)(3)(ii) of Title 10 of the *Code of Federal Regulations* (10 CFR), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of Section 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

The NRC staff has reviewed your application and concluded that the following information delineated below is necessary to enable the NRC staff to make an independent assessment regarding the acceptability of the proposed amendment request in terms of regulatory requirements and the protection of public health and safety and the environment.

RG 1.200 describes an acceptable approach for defining the technical adequacy of a base PRA. This assessment can be performed by directly comparing the base PRA to the supporting requirements in the endorsed ASME Standard RA-Sb-2005 and addressing the NRC staff position on each requirement discussed in Appendix A of RG 1.200. Alternatively, a licensee can perform a self-assessment starting with the results of a previous peer review performed in accordance with the process documented in NEI 00-02 and addressing the NRC staff position on each requirement discussed in Appendix B of RG 1.200. Entergy's RI-ISI relief request does not include an assessment of its PRA against the requirements of RG 1.200 and therefore does not demonstrate consistency with RG 1.200. The submittal also does not provide any alternative measure of technical adequacy.

Entergy's submittal contains no summarizing information about the results of its evaluation. Instead, the submittal indicates that the evaluation required to develop the proposed program has not yet been performed but will be done prior to implementation of its proposed program. The NRC staff relies on the summarizing information about the results of an evaluation to support the conclusion that the proposed program satisfies the requirements of 10 CFR 50.55a(a)(3)(i) on the basis that the alternative provides an acceptable level of quality and safety. For example, Entergy has no change in risk estimate to provide to the NRC staff, nor can it confirm that the changes in risk guidelines applicable to their chosen method have been satisfied.

As described above, without the following required information, the NRC staff does not have sufficient information to begin its review.

- 1) Entergy's relief request must be modified to provide a discussion confirming that either RG 1.200 guidelines on the technical adequacy have been evaluated and satisfied, or provide and justify an acceptable alternative approach.
- 2) Entergy must perform the evaluation and develop its proposed program and provide the summarizing description and results of that analysis in sufficient detail for the NRC staff to review to support its conclusion that the proposed program provides an acceptable level of quality and safety.

In order to make the application complete, the NRC staff requests that the licensee supplement the application to address the information requested above by July 10, 2008. This will enable the NRC staff to begin its detailed technical review. If the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated timeframe in this letter were discussed with Mr. Robert Clark of your staff on June 25, 2008.

Vice President Operations

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If you have any questions, please contact me at (301) 415-1445.

Sincerely,

/RA/

Alan Wang, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-313

cc w/encl: See next page

Vice President Operations

- 3 -

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Arkansas Nuclear One

(6/19/08)

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