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1CAN070804

July 21, 2008

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

SUBJECT: License Amendment Request  
Regarding Technical Specification Changes Associated with  
Adoption of TSTF-359  
Arkansas Nuclear One, Unit 1  
Docket No. 50-313  
License No. DPR-51

- REFERENCES:
1. Entergy letter dated October 22, 2007, "License Amendment Request: Technical Specification Changes Regarding Mode Change Limitations and Associated Bases Using the Consolidated Line Item Improvement Process" (1CAN100701) (TAC NO: MD7179)
  2. NRC letter dated April 2, 2008, "Arkansas Nuclear One, Unit No. 1 – Issuance of Amendment Re: Technical Specification Task Force (TSTF) change TSTF-359, "Increased Flexibility in Mode Restraints" (1CNA040801) (TAC NO: MD7179)

Dear Sir or Madam:

By letter (Reference 1), Entergy Operations, Inc. (Entergy) proposed a change to the Arkansas Nuclear One, Unit 1 (ANO-1) Technical Specifications (TSs) to support adoption of Technical Specification Task Force (TSTF) 359, "Increased Flexibility in Mode Restraints." The NRC approved adoption of TSTF-359 for ANO-1 in TS Amendment 232 (Reference 2).

The overall intent of TSTF-359 was to eliminate exceptions to Limiting Condition for Operation (LCO) 3.0.4 within individual specifications and provide requirements within LCO 3.0.4 to control mode changes when TS-required equipment is inoperable. Following implementation of TS Amendment 232, Entergy discovered that one of the marked-up TS pages which contained an LCO 3.0.4 exception was not provided to the NRC for review in the original submittal (Reference 1) and subsequently was not included in the NRC-approved TS amendment (Reference 2). Therefore, Entergy is submitting this omitted page for NRC review and approval in order to maintain consistency with the intent of TSTF-359.

The omitted page involves an LCO 3.0.4 exception to the 30-day allowable outage time of the Startup No. 2 Transformer in TS 3.8.1. The page was identified and electronically marked-up at the time of original letter was drafted. However, this particular LCO 3.0.4 exception was not denoted in TSTF-359 because the exception is associated with an ANO specific application of maintenance related to Startup No. 2 Transformer. This transformer is shared between the ANO units and the 30-day allowable outage time to support maintenance is not generic to the industry; therefore, it is not included in the standard TSs of NUREG-1430 for Babcock & Wilcox plants.

In light of the above, it was not readily apparent that an affected page was missing when the final comparison of the Entergy letter to the TSTF-359 mark-ups was completed prior to transmitting to the NRC. The aforementioned omission has been entered into the ANO Corrective Action Process.

Upon identification, the omitted page was immediately discussed with the ANO-1 NRC Project Manager and it was concluded that a new TS amendment would be necessary. Because the application of TSTF-359 has already been approved for ANO-1, the NRC agreed that an explanation of the omission be included in a cover letter, the omitted page included in attachment, and that no further justification would be required. Note that, given the new wording of LCO 3.0.4 following TSTF-359 adoption, an LCO 3.0.4 exception (i.e., stating that LCO 3.0.4 is not applicable) in an individual specification is invalidated.

In addition to the above, a typographical error was noted on the affected page and is corrected as part of this submittal (the term "operability" is mis-spelled in the Completion Time for Required Action B.2). This change is administrative in nature and requires no further justification.

The mark-up of the omitted page is included in Attachment 1. Attachment 2 provides the revised (clean) version of the page. Because the current TS 3.8.1 Bases do not include discussion of the aforementioned LCO 3.0.4 exception, no TS Bases change are required.

Although the proposed change is neither emergency or exigent, Entergy requests review and approval of the proposed change as soon as reasonably practical in order to establish consistency with the intent of TSTF-359 and the recently approved ANO-1 TS Amendment 232.

There are no new commitments contained in this letter.

If you have any questions or require additional information, please contact Dale James at 479-858-4619.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 21, 2008.

Sincerely,

TGM/dbb

Attachments:

1. Proposed Technical Specification Change (mark-up)
2. Revised Technical Specification Page

cc: Mr. Elmo E. Collins  
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**Attachment 1**

**To**

**1CAN070804**

**Proposed Technical Specification Change (mark-up)**

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. (continued)</p>	<p>A.3 -----NOTE----- Startup Transformer No. 2 may be removed from service for up to 30 days for preplanned preventative maintenance. This 30 day Completion Time may be applied not more than once in any 10 year period. <del>The provisions of LCO 3.0.4 are not applicable to Startup Transformer No. 2 during this 30-day preventative maintenance period.</del> -----</p> <p>Restore required offsite circuit to OPERABLE status.</p>	<p>72 hours</p> <p><u>AND</u></p> <p>10 days from discovery of failure to meet LCO</p>
<p>B. One DG inoperable.</p>	<p>B.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit(s).</p> <p><u>AND</u></p> <p>B.2 Declare required feature(s) supported by the inoperable DG inoperable when its redundant required feature(s) is inoperable.</p> <p><u>AND</u></p> <p>B.3.1 Determine OPERABLE DG is not inoperable due to common cause failure.</p> <p><u>OR</u></p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 12 hours thereafter</p> <p>4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)</p> <p>24 hours</p>

**Attachment 2**

**To**

**1CAN070804**

**Revised Technical Specification Page**

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.3 -----NOTE----- Startup Transformer No. 2 may be removed from service for up to 30 days for preplanned preventative maintenance. This 30 day Completion Time may be applied not more than once in any 10 year period. -----</p> <p>Restore required offsite circuit to OPERABLE status.</p>	<p>72 hours</p> <p><u>AND</u></p> <p>10 days from discovery of failure to meet LCO</p>
B. One DG inoperable.	<p>B.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit(s).</p> <p><u>AND</u></p> <p>B.2 Declare required feature(s) supported by the inoperable DG inoperable when its redundant required feature(s) is inoperable.</p> <p><u>AND</u></p> <p>B.3.1 Determine OPERABLE DG is not inoperable due to common cause failure.</p> <p><u>OR</u></p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 12 hours thereafter</p> <p>4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)</p> <p>24 hours</p>