Entergy

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0CAN041001

April 8, 2010

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

SUBJECT: Generic Letter 2004-02 Supplemental Information
Arkansas Nuclear One – Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6

Reference:
1. Entergy letter dated September 24, 2009 (0CAN090901), Generic Letter (GL) 2004-02 Final Supplemental Response Request for Additional Information
2. NRC letter dated May 21, 2009 (0CNA050905), Request for Additional Information Regarding Supplemental Response to GL 2004-02
3. Entergy letter dated September 15, 2008 (0CAN090801), GL 2004-02 Final Supplemental Response

Dear Sir or Madam:

By letter dated September 24, 2009 (Reference 1), Entergy Operations, Inc. (Entergy) submitted responses to requests for additional information (RAIs) requested in NRC correspondence dated May 21, 2009 (Reference 2) concerning the final supplemental response for Arkansas Nuclear One (ANO) dated September 15, 2008 (Reference 3). As described in Section 3.h of Reference 3, the application of WCAP-16568-P, "Jet Impingement Testing to determine Zone-of-Influence (ZOI) for Design Basis Accident-Qualified/Acceptable Coatings," was credited for both ANO-1 and ANO-2 epoxy and inorganic zinc primer coatings. Based on preliminary information from Westinghouse regarding subsequent testing at Wyle Labs, the use of WCAP-16568-P for inorganic zinc primer is expected to no longer be acceptable.

The current methodology associated with credit for a 5D primer coating ZOI needs to be replaced by specific tracking of qualified primer-only coatings that could potentially be impacted by an increased ZOI sphere from a primary system piping break. Primer-only qualified coating location and surface area data for the steam generator cavities, which are the areas potentially impacted by the increased primer ZOI, is not currently available. Inspections will be conducted in the on-going refueling outage for ANO-1 (Spring 2010) and the next refueling outage for ANO-2 (Spring 2011) to establish these totals. The primer-only

qualified coatings total volume is needed as input for the debris generation calculation revision. This inspection is anticipated to confirm the ANO-1 debris currently credited is conservatively bounding. The ANO-2 primer-only qualified coatings debris inspection total will not be available until the Spring 2011 refueling outage. In order to address this condition prior to the end of 2010, the ANO-2 debris generation calculation will be reanalyzed using a primer coating debris that is projected to be conservatively bounding considering the ANO-1 results. This calculation will be confirmed to be conservative during the next ANO-2 refueling outage (Spring 2011).

Entergy plans to evaluate the impact of the qualified primer coating ZOI change using the engineering change process, which should address any needed changes to the ANO painting specification as well as the ANO Coatings Program documents. Changes to these documents, if required, are expected to be described in an updated NRC correspondence addressing the impacts of revised coating ZOIs to previously submitted information regarding GL 2004-02 compliance.

Entergy is committed to timely and efficient resolution of the coating ZOI issue. Numerous calculations and related design bases documents are affected. A revision to the debris generation calculation is required for each unit, which affects several related documents. The revised analysis will comply with previously reviewed and approved methods, either per Nuclear Energy Institute 04-07 or accepted ANO RAI responses, or the proposed changes will be discussed with the NRC staff for acceptability prior to their use. Entergy plans to complete any needed modifications before the end of refueling outage 1R24 for ANO-1 (currently scheduled to begin March 2013) and refueling outage 2R22 ANO-2 (currently scheduled to begin September 2012). Entergy will submit a letter to the NRC by September 30, 2010, reflecting changes to previously submitted information in ANO's supplemental response and RAIs due to the updated debris ZOIs and will inform the NRC of any changes made to these plans.

The new commitments contained in this submittal are summarized in the attachment. If you have any questions or require additional information, please contact me.

Sincerely,

DBB/nbm

cc: Mr. Elmo Collins
Regional Administrator
U. S. Nuclear Regulatory Commission
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**Attachment to**

**0CAN041001**

**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 | |
| Coating inspections will be conducted in the on-going refueling outage for ANO-1. | X | | Spring 2010 |
| Coating inspections will be conducted in the next refueling outage for ANO-2. | X | | Spring 2011 |
| In order to address this condition prior to the end of 2010, the ANO-2 debris generation calculation will be reanalyzed using a primer coating debris that is projected to be conservatively bounding considering the ANO-1 results. | X | | Sept. 30, 2010 |
| The ANO-2 debris generation calculation will be confirmed to be conservative during the next ANO-2 refueling outage. | X | | Spring 2011 |
| The revised analysis will comply with previously reviewed and approved methods, either per Nuclear Energy Institute 04-07 or accepted ANO RAI responses, or the proposed changes will be discussed with the NRC staff for acceptability prior to their use. Entergy will submit a letter to the NRC reflecting changes to previously submitted information in ANO's supplemental response and RAIs due to the updated debris ZOIs and will inform the NRC of any changes made to these plans. | X | | Sept. 30, 2010 |
| Entergy plans to complete any needed modifications before the end of refueling outage 1R24 for ANO-1. | X | | Spring 2013 |
| Entergy plans to complete any needed modifications before the end of refueling outage 2R22 ANO-2. | X | | Fall 2012 |