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Christopher J. Schwarz
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Arkansas Nuclear One

1CAN061101

June 10, 2011

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

SUBJECT: Response to Request for Additional Information Concerning
License Amendment Request
Changes to Technical Specification 3.9.3
Technical Change Traveler – TSTF-312, Revision 1
Arkansas Nuclear One, Unit 1
Docket No. 50-313
License No. DPR-51

REFERENCES:
1. Entergy letter dated August 10, 2010, "License Amendment Request Changes to Technical Specification 3.9.3 Technical Change Traveler – TSTF-312, Revision 1" (1CAN081002)
2. NRC email dated April 29, 2011

Dear Sir or Madam:

Entergy Operations, Inc. (Entergy) requested an amendment to the Arkansas Nuclear One, Unit 1 (ANO-1) Technical Specifications (TS) via Reference 1. Specifically, the proposed amendment would revise TS 3.9.3, "Reactor Building Penetrations", to allow reactor building flow path(s) providing direct access from the reactor building atmosphere to the outside atmosphere to be unisolated under administrative control, during movement of irradiated fuel assemblies. The proposed change is consistent with Technical Specification Task Force (TSTF) Technical Change Traveler 312-A, Revision 1. In Reference 2, the NRC provided a request for additional information concerning the inserts that are part of TSTF-312-A, Revision 1.

The first insert was included in the proposed amendment word for word. The third insert is a "REVIEWERS NOTE". These notes belong in the traveler themselves as an aid to the reviewer of things to consider when the traveler is being adopted. As such they are not appropriate for inclusion into a request for an amendment.

The second insert was adopted, but not verbatim. The existing bases provide additional details concerning all penetrations (i.e., equipment hatch and personnel airlocks) that do not exist in the traveler's insert. Entergy believes the user is best served with this additional detail.

The only significant difference between the traveler's second insert and what was proposed in Reference 1 is the phrase "CORE ALTERATIONS". Attached is the revised mark-up of the bases to include that phrase.

This revision to the bases of the TS does not alter the no significant hazards consideration discussion or the commitment made in Reference 1.

If you have any questions or require additional information, please contact Stephenie Pyle at 479-858-4704.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on June 10, 2011.

Sincerely,

Original signed by Christopher J. Schwarz

CJS/rwc

Attachment Revised Mark-up of Technical Specification Bases (For Information Only)

cc: Mr. Elmo E. Collins
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U. S. Nuclear Regulatory Commission
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Radiation Control Section
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Little Rock, AR 72205

Attachment to

1CAN061101

Revised Mark-up of Technical Specification Bases
(For Information Only)

LCO

This LCO limits the consequences of a fuel handling accident in the reactor building by limiting the potential escape paths for fission product radioactivity from the reactor building. The LCO requires any penetration providing direct access from the reactor building atmosphere to the outside atmosphere to be closed or capable of being closed by an OPERABLE reactor building isolation device~~valve~~. This LCO requires the reactor building purge isolation valves and the purge exhaust flow path radiation monitor be OPERABLE.

The LCO is modified by a Note allowing~~The~~ reactor building personnel airlock doors, ~~and/or~~ the equipment hatch, and/or other penetrations with direct access from the reactor building atmosphere to the outside atmosphere to~~may~~ be open during movement of irradiated fuel in the reactor building under administrative controls provided that the opening~~one door~~ is capable of being closed in the event of a fuel handling accident. Administrative controls shall ensure that 1) appropriate personnel are aware of the open status of the penetration flow path during CORE ALTERATIONS or movement of irradiated fuel assemblies in the reactor building, and 2)~~that both personnel airlock doors and/or equipment hatch are open, that~~ a specifie~~d~~d individual(s) is designated and readily available to close/isolate the flow path~~an airlock door and the equipment hatch cover following a required evacuation of the reactor building~~in the event of a fuel handling accident, including where applicable, ~~and~~ removal of any obstruction(s) (e.g. cables and hoses) that could prevent closure of an airlock door and the equipment hatch cover be capable of being quickly removed (Ref. 1 and 3). For closure, the equipment hatch cover will be in place with a minimum of four bolts securing the cover to the sealing surface. During outages, a temporary equipment hatch cover may be used in lieu of the permanent equipment hatch cover (Ref. 2).

The definition of "direct access from the reactor building atmosphere to the outside atmosphere" is any path that would allow for the transport of reactor building atmosphere to any atmosphere located outside of the reactor building structure. This includes the Auxiliary Building. As a general rule, closed systems do not constitute a direct path between the reactor building and the outside environments. All permanent and temporary penetration closures should be evaluated to assess the possibility for a release path to the outside environment. For the purpose of determining what constitutes a "direct access" path, no failure mechanisms should be applied to create a scenario which results in a "direct access" path. For example, line breaks, valve failures, power losses or natural phenomenon should not be postulated as part of the evaluation process.

APPLICABILITY

The reactor building penetration requirements are applicable during movement of irradiated fuel assemblies within the reactor building because this is when there is a potential for a fuel handling accident. In MODES 1, 2, 3, and 4, the reactor building penetration requirements are addressed by LCO 3.6.1. In MODES 5 and 6, when movement of irradiated fuel assemblies within the reactor building is not being conducted, the potential for a fuel handling accident