

## NRR-PMDAPEm Resource

---

**From:** Kalyanam, Kaly  
**Sent:** Friday, November 22, 2013 9:38 AM  
**To:** BICE, DAVID B (ANO) (DBICE@entergy.com)  
**Subject:** RAI related to the adoption of (TSTF)-422, Revision 2 (TAC No. MF1199)

To: Dave Bice

**Subject:** ARKANSAS NUCLEAR ONE, UNIT 2 - RAI related to the adoption of (TSTF)-422, Revision 2, "Change in Technical Specifications End States (CE NPSD-1186)" (TAC No. MF1199)

By letter dated March 26, 2013 (ADAMS Accession No. ML13085A283), Entergy Operations, Inc. (Entergy, the Licensee) submitted a License Amendment Request (LAR) proposing changes to the Technical Specifications (TS) for Arkansas Nuclear One, Unit 2, facility.

The proposed amendment would modify the TS requirements for end states associated with the implementation of the approved TSTF-422, Revision 2, "Change in Technical Specifications End States (CE NPSD-1186)." TS Actions End States modifications would permit, for some systems, entry into a hot shutdown (Mode 4) end state rather than a cold shutdown (Mode 5) end state that is the current TS requirement.

The US Nuclear Regulatory Commission staff has reviewed the submittal and identified the need for additional information to complete its review of the LAR. A response to this RAI within 30 days from the receipt of this correspondence is requested. If this schedule cannot be met, please advise us as soon as possible, which would enable the staff to adequately plan the resources.

The staff RAI is as below:

REQUEST FOR ADDITIONAL INFORMATION

ARKANSAS NUCLEAR ONE, UNIT 2

ENTERGY OPERATIONS, INC

ADOPTION OF TSTF-422, REVISION 2,

"CHANGE IN TECHNICAL SPECIFICATIONS END STATES (CE NPSD-1186)"

By letter dated March 26, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13085A283), Entergy Operations, Inc. (Entergy, the Licensee) submitted a License Amendment Request (LAR) which proposed changes to the Technical Specifications (TS) for Arkansas Nuclear One, Unit 2, facility. According to the licensee, the proposed amendment would modify the TS requirements for End States associated with implementation of the approved Technical Specification Task Force (TSTF) traveler TSTF-422, Revision 2, "Change in Technical Specifications End States (CE NPSD-1186)," dated December 22, 2009 (ADAMS Accession Number ML093570241). TS Actions End States modifications would permit, for some systems, entry into a hot shutdown (Mode 4) end state rather than a cold shutdown (Mode 5) end state that is the current TS requirement.

During review of the application, the Staff noticed certain concerns as explained below:

1. Items 6, 7, and 16 in section 2.2, "Optional Changes and Variations," in the licensee's application state the following:

"The markup and clean version of this TS page included in Attachments 3 and 4 of this letter, respectively, are based on a revised version currently under NRC review, but not yet approved by the NRC. This version is based on Entergy letter dated July 9, 2012, "Technical Specification (TS) Change Related to Revised Fuel Assembly Drop Analysis and Adoption of TSTF-51, TSTF-272, TSTF-286, and TSTF-471." Should the changes reflected in Entergy's July 9, 2012, letter not be approved, a revised version of this TS page will be forward to the NRC at the appropriate time. With respect to this unapproved version of TS Page 3/4 3-26, a place-holder has been inserted in the footer (Amendment No. "xxx") with the assumption that the July 9, 2012, Entergy amendment request will be approved."

Discussion:

During a recent review of an applicant's license amendment request for the adoption of TSTFs-51,-272,-286 and -471 TS related changes, the Nuclear Regulatory Commission (NRC) Staff's preliminary review identified certain potential operating issues with the implementation of these TSTFs. As a result, the Staff is currently in the process of informing the licensees through the industry TSTF group that the NRC would not consider an amendment request regarding adoption of such TSTFs until the Staff completes its review.

Request For Additional Information:

The Staff requests the licensee to consider above information and determine a need for a revision to its application with a focus on the adoption of TSTF-422 related changes only.

2. Section 3.0 of model SE for TSTF-422, (ADAMS Accession No. ML103270197) provides the Staff's assessment for the TSTF's proposed changes. The assessment is based on operability and availability of TS defined specific systems and functions for plants who have adopted a version of Standard Technical Specifications (STS). The licensee states in its application that ANO-1, Unit 2 TSs have not been converted to an STS format.

Request For Additional Information:

The Staff requests that the licensee should review the Staff's assessment provided in the model SE and determine that its TS specified systems, functions and nomenclature is equivalent to those addressed in the assessment, or discuss differences, if any. The technical basis for the approval of TSTF-422 was documented in the Staff's Safety Evaluation (Reference: ADAMS Accession No. ML011980047, dated July, 17, 2001). It is not clear that the licensee's proposed TS meet the technical basis, upon which, TSTF-422 was approved. The licensee either needs to demonstrate that they meet the TSTF-422 technical basis or provide an alternate basis for approval.

Regulatory Basis

The regulations under 10 CFR 50.36 (c)(2)(i) state that Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility (emphasis added). When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met. The licensee's application proposes changes to end-states associated with several of its TS LCOs as listed in the application.



**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 930

**Mail Envelope Properties** (Kaly.Kalyanam@nrc.gov20131122093800)

**Subject:** RAI related to the adoption of (TSTF)-422, Revision 2 (TAC No. MF1199)  
**Sent Date:** 11/22/2013 9:38:23 AM  
**Received Date:** 11/22/2013 9:38:00 AM  
**From:** Kalyanam, Kaly

**Created By:** Kaly.Kalyanam@nrc.gov

**Recipients:**  
"BICE, DAVID B (ANO) (DBICE@entergy.com)" <DBICE@entergy.com>  
Tracking Status: None

**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	6118	11/22/2013 9:38:00 AM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**