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Jeremy G. Browning
Site Vice President
Arkansas Nuclear One

10 CFR 2.390 Attachments Withheld

OCAN121302

December 17, 2013

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

SUBJECT: License Amendment Request – Cyber Security
Plan Implementation Schedule
Arkansas Nuclear One – Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6

- REFERENCES:
1. NRC Internal Memorandum to Barry Westreich from Russell Felts, *Review Criteria for 10 CFR 73.54, Cyber Security Implementation Schedule Milestone 8 License Amendment Requests*, dated October 24, 2013
 2. NRC letter to Entergy, *Issuance of Amendment Re: Approval of Cyber Security Plan*, dated July 27, 2011 (OCNA071106)
 3. NRC Internal Memorandum to Directors of Regional Divisions of Reactor Safety from Barry Westreich, *Enhanced Guidance For Licensee Near-Term Corrective Actions to Address Cyber Security Inspection Findings and Licensee Eligibility for "Good-Faith" Attempt Discretion*, dated July 1, 2013

Dear Sir or Madam:

Pursuant to 10 CFR 50.4 and 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests an amendment to the Renewed Facility Operating Licenses for Arkansas Nuclear One (ANO), Unit 1 and Unit 2. In accordance with the guidelines provided by Reference 1, this request proposes a change to the ANO Cyber Security Plan Milestone 8 full implementation date as set forth in the Cyber Security Plan Implementation Schedule approved by Reference 2. Reference 3 provided additional NRC internal guidance.

Attachment 1 provides an evaluation of the proposed change. Attachment 2 contains proposed marked-up operating license pages for the Physical Protection license condition for ANO-1 and ANO-2 to reference the commitment change provided in this submittal.

This letter contains security-related information – Attachments 1 and 4
are withheld from public disclosure per 10 CFR 2.390

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Attachment 3 contains the proposed revised operating license pages. Attachment 4 contains a change to the date of Implementation Milestone 8. Entergy requests that Attachments 1 (Sections 1, 2, and 3) and 4, which contain security-related information (SRI), be withheld from public disclosure in accordance with 10 CFR 2.390.

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c), and it has been determined that the changes involve no significant hazards consideration. The bases for these determinations are included in Attachment 1.

Entergy requests this license amendment be effective as of its date of issuance. Although this request is neither exigent nor emergency, your review and approval is requested prior to December 15, 2014.

The revised commitment contained in this submittal is summarized in Attachment 5. Should you have any questions concerning this letter, 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 December 17, 2013.

Sincerely,

Original signed by Jeremy G. Browning

JGB/nbm

Attachments: 1. Analysis of Proposed Operating License Change (contains SRI)
2. Proposed ANO-1 and ANO-2 Operating License Changes (mark-up)
3. Revised ANO-1 and ANO-2 Operating License Pages
4. Revised Cyber Security Plan Implementation Schedule (contains SRI)
5. List of Regulatory Commitments

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cc: Mr. Marc L. Dapas
Regional Administrator
U. S. Nuclear Regulatory Commission, Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511

NRC Senior Resident Inspector
Arkansas Nuclear One
P.O. Box 310
London, AR 72847

U. S. Nuclear Regulatory Commission
Attn: Mr. Kaly Kalyanam
MS O-8 B1
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Mr. Bernard R. Bevil
Arkansas Department of Health
Radiation Control Section
4815 West Markham Street Slot #30
Little Rock, AR 72205

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Attachment 2

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Proposed ANO-1 and ANO-2 Operating License Changes (mark-up)

EOI shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The EOI CSP was approved by License Amendment No. 244 as supplemented by ~~a~~ changes approved by License Amendment Nos. 247 and xxx.

(5) Implementation of the Improved Technical Specifications (ITS)

The licensee is authorized to relocate certain Technical Specification requirements previously included in Appendix A to licensee controlled documents, as described in Table R, Relocated Specifications, and Table LA, Removal of Details, attached to the Safety Evaluation for Amendment No. 215. These requirements shall be relocated to the appropriate documents as part of the implementation of the ITS.

The schedule for performing Surveillance Requirements (SRs) that are new or revised in Amendment No. 215 shall be as follows:

1. For SRs that are new in this amendment, the first performance shall be due at the end of the first surveillance interval, which begins on the date of implementation of this amendment.
2. For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval shall begin upon completion of the first surveillance performed after implementation of this amendment.
3. For SRs that existed prior to this amendment that contained modified acceptance criteria, the performance shall be due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.
4. For SRs that existed prior to this amendment whose interval of performance are being extended, the first extended surveillance interval shall begin upon completion of the last surveillance performed prior to the implementation of this amendment.

(6) Deleted

(7) Deleted

D. Physical Protection

EOI shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Arkansas Nuclear One Physical Security, Safeguards Contingency and Training & Qualification Plan," as submitted on May 4, 2006.

EOI shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The EOI CSP was approved by License Amendment No. 294 as supplemented by ~~a~~ changes approved by License Amendment Nos. 295 and xxx.

E. This renewed license is subject to the following additional condition for the protection of the environment:

Before engaging in additional construction or operational activities which may result in an environmental impact that was not evaluated by the Commission, EOI will prepare and record an environmental evaluation for such activity. When the evaluation indicates that such activity may result in a significant adverse environmental impact that was not evaluated, or that is significantly greater than that evaluated, in the Final Environmental Statement (NUREG-0254) or any addendum thereto, and other NRC environmental impact assessments, EOI shall provide a written evaluation of such activities and obtain prior approval from the Director, Office of Nuclear Reactor Regulation.

F. Updated Final Safety Analysis Report Supplement

The Final Safety Analysis Report supplement, as revised, shall be included in the next scheduled update to the Final Safety Analysis Report required by 10 CFR 50.71(e)(4) following issuance of this renewed license. Until that update is complete, ANO-2 may make changes to the programs and activities described in the supplement without prior Commission approval, provided that ANO-2 evaluates each such change pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements of that section.

The ANO-2 Final Safety Analysis Report supplement, submitted pursuant to 10 CFR 54.21(d), describes certain future activities to be completed prior to the period of extended operation. ANO-2 shall complete these activities no later than July 17, 2018, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection.

Attachment 3

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Revised ANO-1 and ANO-2 Operating License Pages

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Attachment 5

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List of Regulatory Commitments

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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	
Full implementation of <i>Arkansas Nuclear One Cyber Security Plan</i> for all safety, security, and emergency preparedness functions will be achieved.	X		June 30, 2016