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November 4, 2014

U.S. Nuclear Regulatory Commission
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SUBJECT: Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident
Arkansas Nuclear One – Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6

Dear Sir or Madam:

On March 12, 2012, the NRC issued Reference 1 to all power reactor licensees. By Reference 5, Entergy Operations, Inc. (Entergy) provided the Seismic Hazard and Screening Reports for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2) requested by Reference 1. The reports provided the basis for both units to screen out of expending further resources associated with the Expedited Seismic Evaluation Process (ESEP) (Reference 2). The screening was based on demonstrating that the plant capacity spectra for the ANO units from the Individual Plant Examination for External Events (IPEEE) exceed the new ground motion response spectrum (GMRS) in the one to ten Hertz range. In Reference 6, the NRC determined that ANO-1 and ANO-2 had been 'conditionally screened-in' because additional information was needed to support a final screening and prioritization decision. Entergy responded to the NRC request for additional information in Reference 7, and in a conference call held on October 21, 2014. Entergy expects the NRC final screening and prioritization to conclude that further evaluation associated with the ESEP is not required for ANO-1 and 2.

In Reference 6, the NRC stated the following:

"Plants identified as "conditional screen-in" should submit the Expedited Approach by December 31, 2014 and, until a final determination is made, conduct a seismic risk evaluation as prioritized in Enclosure 2."

In Reference 1, the NRC requested interim evaluations and actions "...to address the higher seismic hazard..." "...prior to completion of risk evaluation." Section 1 of the Augmented Approach guidance (Reference 4) states that "...this report addresses interim evaluations..." "...to be implemented prior to performing complete plant seismic risk evaluations." The NRC endorsement of the Augmented Approach guidance (Reference 5), states that the ESEP can provide seismic margin "...prior to performing the complete plant seismic risk evaluations."

From a seismic safety perspective, the IPEEE, which used the Electric Power Research Institute (EPRI) seismic margin assessment approach, has already demonstrated that the plant can safely shut down with plant seismic capacity above the GMRS. The ESEP review per the Reference 3 guidance would only consider a minimal increase above the safe shutdown earthquake in seismic demand and would be bounded by the IPEEE evaluations already conducted. The review of a limited set of components to these demand levels, in accordance with the ESEP guidance, would not provide a significant difference in safety insight or indication of seismic margin for the units beyond what was already provided by the IPEEE.

Since the ANO units have demonstrated seismic capacities above the GMRS, Entergy concludes the nuclear safety benefit from the performance of an ESEP is not commensurate with resource expenditures and is furthermore bounded by the already conducted IPEEE evaluations. Therefore, unless the NRC subsequently determines that the ESEP is applicable to the ANO units, Entergy does not intend to perform the ESEP. The plan to perform a high frequency and spent fuel pool evaluation, as indicated in the Seismic Hazard and Screening Reports (Reference 5), remains unchanged.

This letter contains no new regulatory commitments. Should you have any questions regarding this submittal, please contact Stephenie Pyle at 479.858.4704.

I declare under penalty of perjury that the foregoing is true and correct; executed on November 4, 2014.

Sincerely,

ORIGINAL SIGNED BY JEREMY G. BROWNING

JGB/nbm

- REFERENCES:
1. NRC Letter, *Request for Information (RFI) Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident*, dated March 12, 2012, (OCNA031208) (ML12053A340)
 2. Nuclear Energy Institute Letter to NRC, *Proposed Path Forward for NTTF Recommendation 2.1: Seismic Reevaluations*, dated April 9, 2013 (ML13101A379)
 3. Entergy letter to NRC, *Entergy's Response to NRC RFI Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the NTTF Review of Insights from the Fukushima Dai-ichi Accident*, dated April 29, 2013 (OCAN041306) (ML12305A372)
 4. Electric Power Research Institute (EPRI) Technical Report 3002000704, *Seismic Evaluation Guidance: Augmented Approach for the Resolution of Fukushima NTTF Recommendation 2.1 - Seismic*, dated May 2013

5. Entergy letter to NRC, *Seismic Hazard and Screening Report (Central Eastern United States (CEUS) Sites), Response to NRC Request For Information (RFI) Pursuant to 10 CFR 50.54(f) Regarding Recommendation 2.1 of the Near-Term Task Force (NTTF) Review of Insights from the Fukushima Dai-ichi Accident*, dated March 28, 2014 (OCAN031404) (ML14092A021)
6. NRC letter, *Screening and Prioritization Results Regarding Information Pursuant to Title 10 Code of Federal Regulations 50.54(f) Regarding Seismic Hazard Re-Evaluations for Recommendation 2.1 of the Near-Term Task Force (NTTF) Review of Insights from the Fukushima Dai-ichi Accident*, dated May 9, 2014 (OCNA051401) (ML14111A147)
7. Entergy letter to NRC, *Response to Request for Additional Information (RAI) Associated with Near-Term Task Force (NTTF) Recommendation 2.1, Seismic Hazard and Screening Report*, dated August 21, 2014 (OCAN081401)

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