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Jeremy G. Browning
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Arkansas Nuclear One

1CAN011601

January 15, 2016

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

SUBJECT: Response to Round 3 Request for Additional Information
Adoption of National Fire Protection Association Standard NFPA-805
Arkansas Nuclear One, Unit 1
Docket No. 50-313
License No. DPR-51

Dear Sir or Madam:

By email dated January 12, 2016 (Reference 12), the NRC requested additional information associated with the Entergy Operations, Inc. (Entergy) request to amend the Arkansas Nuclear One, Unit 1 (ANO-1) Technical Specifications (TS) and licensing bases to comply with the requirements in 10 CFR 50.48(a), 10 CFR 50.48(c), and the guidance in Regulatory Guide (RG) 1.205, "Risk-Informed Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants." The amendment request followed Nuclear Energy Institute (NEI) 04-02, "Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program under 10 CFR 50.48(c)." This submittal described the methodology used to demonstrate compliance with, and transition to, National Fire Protection Association (NFPA) 805, and included regulatory evaluations, probabilistic risk assessment (PRA), change evaluations, proposed modifications for non-compliances, and supporting attachments.

The request for additional information (RAI) is associated with a previous RAI (Safe Shutdown Analysis (SSA) 11.01, Entergy response provided in Reference 10) regarding an inhibit circuit (i.e., a shorting switch) intended to be used to address the circuit failure modes identified in Information Notice (IN) 92-18, "Potential for Loss of Remote Capability during a Control Room Fire" (ML031200481), for several valves at ANO-1. In a conference call held with members of the NRC staff at 1300 CST on January 6, 2016, Entergy verbally committed to include a failure probability for the subject circuits in the ANO Fire PRA model similar to that performed by the Browns Ferry nuclear facility and accepted in NRC Safety Evaluation Report dated October 28, 2015 (ML15212A796). The Entergy response to the RAI is included in Attachment 1 to this letter.

The information, as detailed in this letter, with respect to the original Entergy request (Reference 1) has been reviewed and Entergy has determined that the information does not invalidate the no significant hazards consideration included in the Reference 1 letter.

In accordance with 10 CFR 50.91(b)(1), a copy of this application is being provided to the designated Arkansas state official.

One new commitment is included in Attachment 2 to this letter.

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 January 15, 2016.

Sincerely,

ORIGINAL SIGNED BY TERRY A. EVANS FOR JEREMY G. BROWNING

JGB/dbb

Attachment:

1. Response to Round 3 Request for Additional Information – ANO-1 Transition to NFPA-805
2. List of Regulatory Commitments

cc: Mr. Marc L. Dapas
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
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NRC Senior Resident Inspector
Arkansas Nuclear One
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U. S. Nuclear Regulatory Commission
Attn: Ms. Andrea E. George
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Radiation Control Section
4815 West Markham Street
Slot #30
Little Rock, AR 72205

REFERENCES:

1. Entergy letter dated January 29, 2014, *License Amendment Request to Adopt NFPA-805 Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants (2001 Edition)* (1CAN011401) (ML14029A438)

2. NRC letter dated May 5, 2015, *Arkansas Nuclear One, Unit 1 – Request for Additional Information Regarding License Amendment Request to Adopt National Fire Protection Association Standard 805* (TAC No. MF3419) (1CNA051501) (ML15091A431)

3. Entergy letter dated May 19, 2015, *Response to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN051501) (ML15139A196)

4. Entergy letter dated June 16, 2015, *60-Day Response to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN061501) (ML15167A503)

5. Entergy letter dated July 21, 2015, *90-Day Response to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN071501) (ML15203A205)

6. Entergy letter dated August 12, 2015, *120-Day Response to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN081501) (ML15224A729)

7. NRC email dated September 8, 2015, *Arkansas Nuclear One, Unit 1 – 2nd Round Request for Additional Information - ANO-1 NFPA 805 LAR (TAC No. MF3419)* (1CNA091501) (ML15251A220)

8. Entergy letter dated September 22, 2015, *Round 2 Response to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN091501) (ML15265A113)

9. NRC email dated October 6, 2015, *Arkansas Nuclear One, Unit 1 – 2nd Round Part 2 Request for Additional Information - ANO-1 NFPA 805 LAR (TAC No. MF3419)* (1CNA101501) (ML15280A114)

10. Entergy letter dated November 4, 2015, *Second Set of Round 2 Responses to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN111501) (ML15308A452)

11. Entergy letter dated November 17, 2015, *Clarification of Response to Round 2 Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN111502) (ML15321A076)

12. NRC email dated January 12, 2016, *Arkansas Nuclear One, Unit 1 – 3rd Round Request for Additional Information - ANO-1 NFPA 805 LAR (TAC No. MF3419)* (1CNA011601)

Attachment 1 to

1CAN011601

Response to Round 3 Request for Additional Information
ANO-1 Transition to NFPA-805

RESPONSE TO ROUND 3 REQUEST FOR ADDITIONAL INFORMATION
ANO-1 Transition to NFPA-805

By email dated January 12, 2016 (Reference 12), the NRC requested additional information associated with the Entergy Operations, Inc. (Entergy) request to amend the Arkansas Nuclear One, Unit 1 (ANO-1) Technical Specifications (TS) and licensing bases to comply with the requirements in 10 CFR 50.48(a), 10 CFR 50.48(c), and the guidance in Regulatory Guide (RG) 1.205, "Risk-Informed Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants." The amendment request followed Nuclear Energy Institute (NEI) 04-02, "Guidance for Implementing a Risk-Informed, Performance-Based Fire Protection Program under 10 CFR 50.48(c)." This submittal described the methodology used to demonstrate compliance with, and transition to, National Fire Protection Association (NFPA) 805, and included regulatory evaluations, probabilistic risk assessment (PRA), change evaluations, proposed modifications for non-compliances, and supporting attachments.

In a conference call held with members of the NRC staff at 1300 CST on January 6, 2016, Entergy verbally committed to include a failure probability for the subject circuits in the ANO Fire PRA model similar to that performed by the Browns Ferry nuclear facility and accepted in NRC Safety Evaluation Report dated October 28, 2015 (ML15212A796). The Round 3 RAI is included below for convenience, followed by the Entergy response. The response includes a new commitment as stated in Attachment 2 of this letter.

SSA RAI 11.01 Response Clarification

In its letter dated November 4, 2015, the licensee submitted a response to Safe Shutdown Analysis (SSA) request for additional information (RAI) 11.01. Specifically, the licensee provided an extensive qualitative explanation concluding that installation of an inhibit circuit (i.e., a shorting switch) addresses the circuit failure modes identified in Information Notice (IN) 92-18, "Potential for Loss of Remote Capability during a Control Room Fire" (ADAMS Accession No. ML031200481), for several valves at ANO-1. Based on the licensee's response to SSA RAI 11.01, it appears that these shorting switches are credited with precluding spurious actuations of the IN 92-18 valves, and so fire-induced damage on DC control circuits located in the vicinity of cables having fusing greater than 10 amps of the inhibit circuits is not modeled in the Fire PRA.

The NRC staff cannot conclude that spurious actuations can be precluded without additional information. As an alternative to concluding that spurious actuation is precluded, spurious actuation need not be modelled if the risk is insignificant for both transition and post-transition risk evaluations (i.e., less than the self-approval risk guidelines); however, the NRC staff cannot reach this conclusion with the limited risk information provided by the licensee. Please provide a sensitivity study demonstrating that the risk impact of failing the protected valves is insignificant, or that the risk of the excluded scenarios in which a fire causes a spurious actuation and the inhibit switch fails is insignificant with regard to the plant change evaluations.

Response

Entergy determined during the original assessment of various fire-related station risks associated with the transition of the ANO-1 licensing basis to NFPA 805 that certain motor and air operated valves (MOVs and AOVs, respectively) could fail in an undesired state, resulting in station risk elevated sufficiently to warrant modification of the associated circuits. Subsequently, an inhibit circuit was designed and committed to in support of lowering overall station risk following transition to NFPA 805. As stated in the above RAI, Entergy has previously provided extensive qualitative discussion regarding the implementation of the subject inhibit circuits. The qualitative discussion was intended to indicate that failure of the inhibit circuit to meet its objective was not credible. However, the above RAI requires a risk-informed assessment to provide a quantitative justification in order to reinforce the previously submitted and related qualitative information.

In a conference call held with members of the NRC staff at 1300 CST on January 6, 2016, Entergy verbally committed to include a failure probability for the subject circuits in the ANO Fire PRA model, similar to that performed by the Browns Ferry nuclear facility and accepted in NRC Safety Evaluation Report (SER) dated October 28, 2015 (ML15212A796). Such modeling would be in lieu of the sensitivity study suggested by the RAI. In a letter dated March 14, 2014 (ML1479A159), the Browns Ferry nuclear facility provided the NRC information supporting the use of a 1E-03 failure probability assumption associated with the subject inhibit circuits. The NRC accepted the Browns Ferry application of the 1E-03 inhibit circuit failure probability in the aforementioned SER. The following discussion provides similar ANO-1 specific information supporting application of a failure probabilities in relation to the subject circuits.

While the subject control circuits for MOVs and AOVs may be affected by fire, the inhibit circuit (or shorting switch), associated conductors, and actuated device are required to undergo multiple failures to defeat this configuration (open circuit and hot short in limited locations). The inhibit circuit bonds the line-side of the actuation device of concern to the circuit return path (neutral or negative) and is assumed to maintain electrical continuity, preventing application of a sufficient voltage that can cause spurious operation via the shorting switch, thus allowing the intended function of the shorting switch to remain effective. Fire exposure in AC circuits is not postulated to cause open circuits as the primary failure mode. Typically, insulation is fully consumed before the copper conductor melts and potential target and source conductors would already be grounded, or the associated fuse/breaker would have cleared. Consequently, no credible hot shorts from either intracable or intercable interactions to other conductors also connected to the line-side of the actuation device are assumed to energize the actuation device because the source conductor is immediately shorted to the circuit return path.

The control circuits that utilize the shorting switch concept have cables routed in raceways for control voltage circuits that are nominally 120 VAC, 125 VDC, or less. This protects target cables from higher energy AC circuits, although the cables will still be exposed to DC cables that have been shown in some tested instances to aggressively arc when fused at greater than 10 amps (reference NUREG/CR-7100, "Direct Current Electrical Shorting in Response to Exposure Fire”). A postulated failure mode where aggressive electrical arcing from a source DC circuit causes collateral damage to the target cable resulting in an open circuit of the shorting switch conductors and failure of the shorting switch function is considered. Any hot short that could cause spurious actuation of the subject MOV or AOV would need to occur subsequent to this postulated failure that melts open the inhibit circuit conductor. ANO-1 raceways can contain cables for DC circuits; therefore, a probability of 1E-03 is proposed to model the likelihood that a

cable containing shorting switch conductors is located next to a DC circuit cable capable of generating an arc that causes collateral damage and potential open circuit of the shorting switch conductors. Although there is uncertainty associated with this probability, it bounds the likelihood that the cable containing shorting switch conductors is located next to a cable capable of generating the arc, that the arc would be generated when the cable is affected by a fire and results in an open circuit of the shorting conductors, and that after the open circuit occurs, a fire-induced short causes a spurious operation.

All of the shorting switches for both the MOV and the AOV control circuits will be in the Main Control Room panels located in Fire Area G. For a fire inside the Main Control Room panel where the shorting switch is located, the shorting switch will be assumed damaged before the fire induced hot short occurs on the modified circuit. Spurious hot short probabilities listed in NUREG/CR-7150, "Joint Assessment of Cable Damage and Quantification of Effects from Fire (JACQUE-FIRE)," will be credited for the modified circuits where the shorting switch is physically damaged by the fire inside the panel in lieu of the 1E-03 circuit failure probability (these probabilities will typically be higher than the 1E-03). As noted previously, insulation on the shorting switch conductor would have to be fully consumed before the copper conductor melts, or the terminal strips, shorting switch, or other devices in the shorting conduction path would have to be consumed/destroyed prior to potential target and source conductors shorting together.

The aggregate risk results of this modeling will be included in the final PRA results to be included in response to PRA RAI 03. This commitment is captured in Attachment 2 of this letter.

In Entergy letter dated November 4, 2015 (Reference 10), a complete list of items associated with the final response to PRA RAI 03 was included in response to PRA RAI 03.b.01. Because a new commitment is being added via this letter, the previous submitted list is copied below, with this new item added for completeness.

RAI No. / Description	Disposition with respect to the final integrated analysis and the aggregated results provided in support of the LAR (to be incorporated into the final PRA RAI 03 response which includes the final Fire PRA quantification results)	Disposition with respect to the self-approval model for post-transition changes
PRA RAI 01.a regarding spatial separation	Spatial separation is not credited. The zone of influence is allowed to cross non-barrier boundaries. No change to the Fire PRA (FPRA) model is required.	Same approach as that used for the final integrated analysis provided in support of the LAR.

RAI No. / Description	Disposition with respect to the final integrated analysis and the aggregated results provided in support of the LAR (to be incorporated into the final PRA RAI 03 response which includes the final Fire PRA quantification results)	Disposition with respect to the self-approval model for post-transition changes
PRA RAI 01.b regarding fire barriers	There are no active fire protection systems supporting the Multi-Compartment Analysis (MCA) fire barriers that require an actuation system (i.e., barrier features which credit systems that require signals from cables or a detection system) as part of any physical analysis unit (PAU) boundary at ANO-1 (e.g., water curtains). The MCA is being revised to sum the generic barrier failure probabilities for each type of barrier present between PAUs.	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 01.c regarding fire propagation from electrical cabinets	The panel factor approach was eliminated prior to submitting the LAR. Severe and non-severe panel fires have been defined based on the zone of influence up to and excluding the nearest target. The methodology used is based on data provided in NUREG/CR-6850, Appendices E and H, and the methodology defined in the Generic Fire Modeling Treatments (GMFT).	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 01.e regarding circuit failure likelihood analysis / PRA RAI 01.e.d regarding spurious operation in other cable configurations	Circuit failure likelihood values used will be consistent with the values specified in NUREG/CR-7150. The guidance from NUREG/CR-7150 regarding 'other cable configurations' recommends the use of the aggregate spurious operation conditional probabilities for in-panel wiring and trunk cables. For instrument circuits, no spurious operation conditional probability will be credited. The guidance on "other cable configurations" will be incorporated into the ANO-1 FPRA in support of the integrated risk assessment PRA RAI 03.	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 01.g regarding modeling new fire Human Error Events	The FPRA will incorporate the update to the Human Reliability Analysis (HRA) methodology that is consistent with developing detailed human error probabilities (HEPs) as outlined in NUREG-1921.	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 01.h regarding state of knowledge correlation (SOKC)	A SOKC was applied to ignition frequencies, circuit failure probabilities, non-suppression probabilities, and HRA basic events. The SOKC will be addressed in the final FPRA documentation.	Same approach as that used for the final integrated analysis provided in support of the LAR.

RAI No. / Description	Disposition with respect to the final integrated analysis and the aggregated results provided in support of the LAR (to be incorporated into the final PRA RAI 03 response which includes the final Fire PRA quantification results)	Disposition with respect to the self-approval model for post-transition changes
PRA RAI 02.a regarding impact of phenomenological conditions	The FPRA model will be revised to address the phenomenological issues as identified in response to PRA RAI 02.a.	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 02.b regarding completion of LERF analysis	Spurious operation of the ADVs and ERV, which could impact Pressure-Induced Steam Generator Tube Rupture (SGTR) and Thermal-Induced SGTR, will be incorporated in the Integrated Analysis performed in response to PRA RAI 03.	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 02.d regarding counting operational demands	The internal events model is not altered by the response to this RAI (see RAI response for basis). Therefore, the resolution of this RAI does not impact the PRA quantification.	Not applicable to the development of the post transition self-approval model, since this RAI did not impact the integrated analysis and the aggregated results provided in support of the LAR.
PRA RAI 02.e regarding counting failures	The internal events model is not altered by the response to this RAI (see RAI response for basis). Therefore, the resolution of this RAI does not impact the PRA quantification.	Not applicable to the development of the post transition self-approval model, since this RAI did not impact the integrated analysis and the aggregated results provided in support of the LAR.
PRA RAI 04 regarding reduced transient heat release rates (HRRs)	Reduced heat release rate values are used in distinct areas with restricted transient controls in the new fire protection program.	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 05 regarding treatment of sensitive electronics	The impact of the results of walkdowns of sensitive electronics will be incorporated into the final FPRA quantification as necessary, consistent with the methodology outlined in FAQ 13-0004.	Same approach as that used for the final integrated analysis provided in support of the LAR.

RAI No. / Description	Disposition with respect to the final integrated analysis and the aggregated results provided in support of the LAR (to be incorporated into the final PRA RAI 03 response which includes the final Fire PRA quantification results)	Disposition with respect to the self-approval model for post-transition changes
PRA RAI 07 regarding propagation of fire from > 440 V electrical cabinets	A review of the “well-sealed” panels that house circuits below 440 V is in progress. The “well-sealed” panels represent a small percentage of the total Bin 15 count and will be removed from the Bin 15 frequency allocation. Additionally, the FPRA will be revised to include fire propagation from sealed > 440 V panels, consistent with the guidance in FAQ 14-0009.	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 08 regarding use of the transient frequency adjustment factors	Transient Frequency Adjustment Factor of 0.1 is being removed from the analysis and replaced with a frequency adjustment that is consistent with FAQ 12-0064.	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 09 regarding fire propagation in the MCR	Fire propagation in the main Control Room (MCR) is being addressed consistent with the guidance of NUREG/CR-6850 Chapter 11 and Appendix S.	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 11 regarding crediting MCR abandonment	The FPRA method for control room abandonment evaluation of the variant and compliant cases is addressed in the RAI response. No changes to this methodology are expected to be required, however, the values provided in the RAI response may change once revisions are incorporated and the final results are quantified.	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 12 regarding multiple versus single cables	The updated quantification will assume the heat release rates associated with multi-bundle configuration for all MCR panels.	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 14	See PRA RAI 15.	See PRA RAI 15.

RAI No. / Description	Disposition with respect to the final integrated analysis and the aggregated results provided in support of the LAR (to be incorporated into the final PRA RAI 03 response which includes the final Fire PRA quantification results)	Disposition with respect to the self-approval model for post-transition changes
PRA RAI 15 [corrected RAI number for this subject, original list incorrectly identified RAI as PRA RAI 14] regarding large reduction credit for modifications	The response to this RAI will calculate the total risk increase associated with the unresolved variances from deterministic requirements (VFDRs) (i.e., VFDRs that are not associated with a plant modification and discuss the impact of important modeling assumptions contributing to the risk significant scenarios for fire areas in the compliant plant model).	Not applicable to the development of the post transition self-approval model, since this RAI did not impact the integrated analysis and the aggregated results provided in support of the LAR.
FM RAI 01.k regarding evaluation of MCR abandonment times	The abandonment frequency will be updated as necessary to reflect the response provided for Fire Modeling (FM) RAI 01.k.	Same approach as that used for the final integrated analysis provided in support of the LAR.
PRA RAI 18.01 – Minimum Joint HEP floor value	a) Each joint HEP value used in the FPRA below 1.0E-05 will include its own justification that demonstrates the inapplicability of the NUREG-1792 lower value guideline. b) An estimate of the number of these joint HEPs below 1.0E-05 and at least two different examples of the justification will be provided with the final PRA RAI 03 response.	Same approach as that used for the final integrated analysis provided in support of the LAR.
SSA RAI 11.01 Clarification – Inhibit Circuit Failure Probability	Inhibit circuits of valves associated with IN 92-18, “Potential for Loss of Remote Capability during a Control Room Fire” (ML031200481) discussed in response to SSA RAI 11.01 in Entergy letter dated November 4, 2015, will be modeled with a failure probabilities as discussed in the RAI response of Entergy letter dated January 15, 2016. The aggregate risk results of the modeling will be included in the final PRA results in response to PRA RAI 03.	Same approach as that used for the final integrated analysis provided in support of the LAR.

REFERENCES:

1. Entergy letter dated January 29, 2014, *License Amendment Request to Adopt NFPA-805 Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants (2001 Edition)* (1CAN011401) (ML14029A438)

2. NRC letter dated May 5, 2015, *Arkansas Nuclear One, Unit 1 – Request for Additional Information Regarding License Amendment Request to Adopt National Fire Protection Association Standard 805* (TAC No. MF3419) (1CNA051501) (ML15091A431)

3. Entergy letter dated May 19, 2015, *Response to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN051501) (ML15139A196)

4. Entergy letter dated June 16, 2015, *60-Day Response to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN061501) (ML15167A503)

5. Entergy letter dated July 21, 2015, *90-Day Response to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN071501) (ML15203A205)

6. Entergy letter dated August 12, 2015, *120-Day Response to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN081501) (ML15224A729)

7. NRC email dated September 8, 2015, *Arkansas Nuclear One, Unit 1 – 2nd Round Request for Additional Information - ANO-1 NFPA 805 LAR (TAC No. MF3419)* (1CNA091501) (ML15251A220)

8. Entergy letter dated September 22, 2015, *Round 2 Response to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN091501) (ML15265A113)

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10. Entergy letter dated November 4, 2015, *Second Set of Round 2 Responses to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN111501) (ML15308A452)

11. Entergy letter dated November 17, 2015, *Clarification of Response to Round 2 Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN111502) (ML15321A076)

12. NRC email dated January 12, 2016, *Arkansas Nuclear One, Unit 1 – 3rd Round Request for Additional Information - ANO-1 NFPA 805 LAR (TAC No. MF3419)* (1CNA011601)

Attachment 2 to

1CAN011601

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
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Entergy will model the Arkansas Nuclear One, Unit 1, inhibit circuits of valves associated with Information Notice (IN) 92-18, "Potential for Loss of Remote Capability during a Control Room Fire" (ML031200481) discussed in response to NRC request for additional information (RAI) 11.01 in Entergy letter dated November 4, 2015,* with failure probabilities as discussed in the RAI response included in Entergy letter dated January 15, 2016. The aggregate risk results of the modeling will be included in the final probabilistic risk assessment (PRA) results in response to PRA RAI 03.	✓		Concurrent with final response to PRA RAI 03.

* Entergy letter dated November 4, 2015, *Second Set of Round 2 Responses to Request for Additional Information – Adoption of National Fire Protection Association Standard NFPA-805* (1CAN111501) (ML15308A452)