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**Stephenie L. Pyle**  
Manager, Regulatory Assurance  
Arkansas Nuclear One

1CAN121601

December 21, 2016

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

**SUBJECT:** Update to Evaluations Described Response to Request for  
Additional Information 14(a)  
Reactor Vessel Internals Aging Management Program Plan  
Arkansas Nuclear One, Unit 1  
Docket No. 50-313  
License No. DPR-51

Dear Sir or Madam:

Entergy Operations, Inc. (Entergy) submitted the Arkansas Nuclear One, Unit 1 (ANO-1) Reactor Vessel Internals Aging Management Program Plan (Reference 1) to fulfill a commitment made as part of the ANO-1 License Renewal Application. The plan identified the reactor vessel internals components that must be included for aging management review and identified the augmented inspection plan for those components.

The NRC issued a Request for Additional Information (RAI) via Reference 2. Reference 3 provided the Entergy responses to the RAI, with a commitment to provide the requested evaluations associated with RAI 14(a) by December 31, 2016. RAI 14 is related to the Applicant / Licensee Action Item 6 of the NRC Staff Safety Evaluation (SE) for MRP-227-A. RAI 14 requests justification for the continued operability of each of the inaccessible reactor vessel internals components through the period of extended operation or, if necessary, a plan for the replacement of the components. This submittal contains the RAI 14(a) response.

Attachment 1 is the proprietary version of AREVA Document ANP-3486P. The respective non-proprietary version of the AREVA document, ANP-3486NP, is included in Attachment 2.

AREVA requests that the proprietary information be withheld from public disclosure in accordance with 10 CFR 2.390. AREVA has provided Entergy with authorization to provide the proprietary information. An affidavit by the information owner, AREVA, supporting the request for non-disclosure is provided in Attachment 3. Therefore, Entergy requests that Attachment 1 of this submittal be withheld from public disclosure in accordance with 10 CFR 2.390.

**Attachment 1 to this letter contains proprietary information**  
**Attachment 1 is withheld from public disclosure per 10 CFR 2.390.**

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NRK


The evaluations presented in this submittal were developed by AREVA for both ANO-1 and Oconee 1, 2 and 3 (Reference 3).

This submittal contains no new regulatory commitments.

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

If you have any questions or require additional information, please contact me.

Sincerely,

 David Bice for Stephanie Pyle

SLP/rwc

Attachments:

1. AREVA Document ANP-3486P, Revision 0, *MRP-227-A Applicant / Licensee Action Item 6 Analysis for Arkansas Nuclear One Unit 1*, PROPRIETARY
2. AREVA Document ANP-3486NP, Revision 0, *MRP-227-A Applicant / Licensee Action Item 6 Analysis for Arkansas Nuclear One Unit 1*, NON-PROPRIETARY
3. Affidavit

REFERENCES:

1. Entergy letter to NRC, *Reactor Vessel Internals Aging Management Program Plan*, dated May 20, 2014 (1CAN051403) (ML14141A554)
2. NRC email to Entergy, dated December 12, 2014, *Requests for Additional Information – Reactor Vessel Internals Aging Management Plan* (TAC No. MF4201) (1CNA121403) (ML14349A787)
3. Duke Energy letter to NRC, *Pressurized Water Reactor Internals and Evaluation Guidelines (MRP-227-A); Submittal of Information to Resolve Licensee Action Item 6*, dated May 26, 2016 (ML16152A051 and ML16152A052)

**Attachment 1 to this letter contains proprietary information  
Attachment 1 is withheld from public disclosure per 10 CFR 2.390.**

cc: Mr. Kriss Kennedy  
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. Thomas J. Wengert  
MS O-8B1A  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

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

**Attachment 3 to**

**1CAN121601**

**Affidavit**



requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA to determine whether information should be classified as proprietary:


- (a) The information reveals details of AREVA's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(c), 6(d) and 6(e) above.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

A large, stylized handwritten signature in black ink, written over a horizontal line.

SUBSCRIBED before me this 31<sup>st</sup>  
day of October, 2016.

A handwritten signature in black ink, written over a horizontal line.

Sherry L. McFaden  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 10/31/18  
Reg. # 7079129

