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Richard L. Anderson
ANO Site Vice President

10 CFR 50.90

1CAN081701

August 14, 2017

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

SUBJECT: Application to Revise Technical Specifications to Adopt TSTF-427,
 "Allowance for Non-Technical Specification Barrier Degradation on
 Supported System Operability"
 Arkansas Nuclear One, Unit 1
 Docket No. 50-313
 License No. DPR-51

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests an amendment to the Arkansas Nuclear One, Unit 1 (ANO-1) Technical Specifications (TSs). The proposed amendment would modify TS requirements for unavailable barriers by adding Limiting Condition for Operation (LCO) 3.0.9. The proposed changes are consistent with NRC-approved Technical Specification Task Force (TSTF) Standard Technical Specification change TSTF-427, Revision 2, "Allowance for Non-Technical Specification Barrier Degradation on Supported System Operability." The availability of this TS improvement was announced in the Federal Register on October 3, 2006 (71 FR 58444), as part of the Consolidated Line Item Improvement Process (CLIP).

A description of the proposed changes associated with TSTF-427, the requested confirmation of applicability, and plant specific verifications is included in Enclosure to this letter.

This amendment request includes new regulatory commitments.

It has been determined that this amendment application does not involve a significant hazard consideration as determined per 10 CFR 50.92, "Issuance of amendment." Pursuant to 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," Section (b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of this amendment

Entergy requests approval of the proposed license amendment by September 1, 2018, with the amendment being implemented within 90 days of approval.

In accordance with 10 CFR 50.91(b)(1), a copy of this application and the no significant hazards consideration (NSHC) determination is being provided to the designated Arkansas state official.

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 August 14, 2017.

Sincerely,

ORIGINAL SIGNED BY TERRY A. EVANS FOR RICHARD L. ANDERSON

RLA/dbb

Enclosure: Evaluation of the Proposed Change

cc: Mr. Scott Morris
Acting Regional Administrator
U. S. Nuclear Regulatory Commission
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NRC Senior Resident Inspector
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U. S. Nuclear Regulatory Commission
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Enclosure to

1CAN081701

Evaluation of the Proposed Change

EVALUATION OF THE PROPOSED CHANGE

1.0 DESCRIPTION

The proposed amendment would modify Technical Specification (TS) requirements for unavailable barriers by adding Limiting Condition for Operation (LCO) 3.0.9.

The proposed changes are consistent with NRC-approved Technical Specification Task Force (TSTF) Standard Technical Specifications change TSTF-427, Revision 2, "Allowance for Non-Technical Specification Barrier Degradation on Supported System Operability." The availability of this TS improvement was announced in the Federal Register on October 3, 2006 (71 FR 58444) as part of the Consolidated Line Item Improvement Process (CLIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Entergy Operations, Inc. (Entergy) has reviewed the safety evaluation (71 FR 58444) dated October 3, 2006 as part of the CLIP. This included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-427. Entergy has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Arkansas Nuclear One, Unit 1 (ANO-1), and justify this amendment for the incorporation of the changes to the ANO-1 TS.

2.2 Optional Changes and Variations

Entergy is not proposing any variations or deviations from the TS changes described in the TSTF-427, Revision 2, or the NRC staff's model safety evaluation dated October 3, 2006.

The mark-up of the TS Bases associated with LCO 3.0.9 as presented in TSTF-427 is included in Attachment 1 for information purposes. These TS Bases will be revised in accordance with the ANO-1 TS Bases Control Program during implementation of this amendment, once approved, as committed to in Attachment 3 of this submittal. The LCO 3.0.9 Bases in TSTF-427 indicates that risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." In the Federal Register dated November 27, 2012, the NRC provided notice that Regulatory Guide 1.182 had been withdrawn and the subject matter had been incorporated into Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." The TSTF issued a letter (Reference 1) noting which approved TSTF travelers are affected and described the effect of withdrawal of Regulatory Guide 1.182. An NRC letter (Reference 2) endorsed the TSTF's approach in the handling of future license amendment requests. As such, ANO-1 is referencing Regulatory Guide 1.160 in the TS Bases associated with this amendment request.

Note that all three pages of ANO-1 TS Section 3.0, "LCO Applicability," are included in this amendment request due to minor formatting changes needed for consistency and to accommodate needed space. In addition, the "LCO" acronym is added to existing LCO 3.0.8 which was inadvertently omitted in ANO-1 TS Amendment 235 which adopted TSTF-372, "Addition of LCO 3.0.8, Inoperability of Snubbers."

3.0 REGULATORY EVALUATION

3.1 Applicable Regulatory Requirements/Criteria

The proposed changes have been evaluated to determine whether applicable regulations and requirements continue to be met. The proposed changes are applicable to the TSs as governed by 10 CFR 50.36, "Technical specifications," and do not impact any General Design Criteria (GDC) as described in 10 CFR 50, Appendix A. Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

In conclusion, Entergy has determined that the proposed changes do not require any exemptions or relief from regulatory requirements, other than the TS, and does not affect conformance with any GDC differently than described in the Safety Analysis Report (SAR).

3.2 Precedent

TSTF-427 has been approved for many U.S. commercial nuclear facilities. The NRC recently approved TSTF-427 for the following facilities:

Brunswick, Catawba, McGuire, Shearon Harris, H.B. Robinson, and Oconee Nuclear Stations on April 26, 2017 (ML17066A374)

Joseph M. Farley Nuclear Plant on February 16, 2017 (ML17034A193).

3.3 No Significant Hazards Consideration Analysis

A change is proposed to the Arkansas Nuclear One, Unit 1 (ANO-1), Technical Specifications (TSs) to adopt NRC-approved Technical Specification Task Force (TSTF) Standard Technical Specifications change TSTF-427, Revision 2, "Allowance for Non-Technical Specification Barrier Degradation on Supported System Operability." The proposed change adds a new Limiting Condition for Operation (LCO) Applicability requirement, LCO 3.0.9, and its associated Bases, to address barriers which cannot perform their related support function for TS systems.

Entergy Operations, Inc. (Entergy) has reviewed the proposed no significant hazards consideration (NSHC) determination published in the Federal Register (71 FR 58444) as part of the Consolidated Line Item Improvement Process (CLIIP). Entergy has concluded that the proposed NSHC determination presented in the Federal Register notice is applicable to ANO-1 and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a), "Notice for public comment."

Note that TS page formatting and the addition of the "LCO" acronym to LCO 3.0.8 are editorial in nature and have no impact on the NSHC determination described herein.

3.4 Verification and Commitments

As discussed in the notice of availability published in the Federal Register (71 FR 32145) on June 2, 2006, for this TS improvement, plant-specific verifications were performed as follows:

1. Entergy Operations, Inc., commits to the guidance of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Section 11, which provides guidance and details on the assessment and management of risk during maintenance.
2. Entergy Operations, Inc., will revise procedures to ensure that the risk assessment and management process described in NEI 04-08, "Allowance for Non-Technical Specification Barrier Degradation on Supported System Operability (TSTF-427)," is used whenever a barrier is considered unavailable and the requirements of LCO 3.0.9 are to be applied, in accordance with an overall configuration risk management program (CRMP) to ensure that potentially risk-significant configurations resulting from maintenance and other operational activities are identified and avoided.

4.0 ENVIRONMENTAL CONSIDERATION

Entergy Operations, Inc., has reviewed the environmental evaluation included in the model safety evaluation dated October 3, 2006, as part of the CLIP. Entergy has concluded that the staff's findings presented in that evaluation are applicable to Arkansas Nuclear One, Unit 1 and the evaluation is hereby incorporated by reference for this application.

5.0 REFERENCES

1. Letter TSTF-14-10 from TSTF to USNRC, "Revision of References to Regulatory Guide 1.182 in Approved Travelers," September 16, 2014 (ML14259A575).
2. NRC letter from A. Mendiola, (USNRC) to TSTF, "U. S. Nuclear Regulatory Commission Response to the TSTF Letter Regarding References to Regulatory Guide 1.182 in Approved Travelers," February 26, 2015 (ML15033A152).

ATTACHMENTS

1. Proposed Technical Specification and Bases Changes (mark-up)
2. Revised (clean) Technical Specification Pages
3. List of Regulatory Commitments

Enclosure Attachment 1 to

1CAN081701

Proposed Technical Specification and Bases Changes (mark-up)

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, ~~and~~ LCO 3.0.8, and LCO 3.0.9.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours; and
- c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications; or

3.0 LCO APPLICABILITY

- LCO 3.0.4 (continued) c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

- LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.
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- LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.15, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

- LCO 3.0.7 Test Exception LCOs 3.1.8 and 3.1.9 allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.
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3.0 LCO APPLICABILITY

- LCO 3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:
- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
 - b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

LCO 3.0.9 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs LCO 3.0.1 through LCO 3.0.98 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

LCO 3.0.1 LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).

LCO 3.0.2 LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the unit that is not further restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.

Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specification.

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

BASES

LCO APPLICABILITY (continued)

LCO 3.0.8 (continued) LCO 3.0.8 does not apply to non-seismic snubbers. The provisions of LCO 3.0.8 are not to be applied to supported TS systems unless the supported systems would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads.

The risk impact of dynamic loadings other than seismic loads was not assessed as part of the development of LCO 3.0.8. These shock-type loads include thrust loads, blowdown loads, water-hammer loads, steam-hammer loads, LOCA loads and pipe rupture loads. However, there are some important distinctions between non-seismic (shock-type) loads and seismic loads which indicate that, in general, the risk impact of the out-of-service snubbers is smaller for non-seismic loads than for seismic loads. First, while a seismic load affects the entire plant, the impact of a non-seismic load is localized to a certain system or area of the plant. Second, although non-seismic shock loads may be higher in total force and the impact could be as much or more than seismic loads, generally they are of much shorter duration than seismic loads. Third, the impact of non-seismic loads is more plant specific, and thus harder to analyze generically, than for seismic loads. For these reasons, every time LCO 3.0.8 is applied, at least one train of each system that is supported by the inoperable snubber(s) should remain capable of performing their required safety or support functions for postulated design loads other than seismic loads.

[LCO 3.0.9](#) [LCO 3.0.9 establishes conditions under which systems described in the TSs are considered to remain OPERABLE when required barriers are not capable of providing their related support function\(s\).](#)

[Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in TSs, that support the performance of the safety function of systems described in the TSs. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function\(s\) under the described conditions. LCO 3.0.9 allows 30 days before declaring the supported system\(s\) inoperable and the LCO\(s\) associated with the supported system\(s\) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.](#)

[If the allowed time expires and the barriers are unable to perform their related support function\(s\), the supported system's LCO\(s\) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.](#)

BASES

LCO APPLICABILITY (continued)

LCO 3.0.9 (continued) This provision does not apply to barriers which support ventilation systems or to fire barriers. The TSs for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65(a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions, and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

BASES

LCO APPLICABILITY (continued)

LCO 3.0.9 (continued) If during the time that LCO 3.0.9 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24-hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24-hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Enclosure Attachment 2 to

1CAN081701

Revised (clean) Technical Specification Pages

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours; and
- c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications; or

3.0 LCO APPLICABILITY

- LCO 3.0.4 (continued) c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

- LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.
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- LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.15, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

- LCO 3.0.7 Test Exception LCOs 3.1.8 and 3.1.9 allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.
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3.0 LCO APPLICABILITY

- LCO 3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:
- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
 - b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

- LCO 3.0.9 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

**Enclosure Attachment 3 to
1CAN081701
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 Operations, Inc., commits to the guidance of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Section 11, which provides guidance and details on the assessment and management of risk during maintenance.		✓	
Entergy Operations, Inc., will revise procedures to ensure that the risk assessment and management process described in NEI 04-08, "Allowance for Non-Technical Specification Barrier Degradation on Supported System Operability (TSTF-427)," is used whenever a barrier is considered unavailable and the requirements of LCO 3.0.9 are to be applied, in accordance with an overall configuration risk management program (CRMP) to ensure that potentially risk-significant configurations resulting from maintenance and other operational activities are identified and avoided.	✓		Within 90 days of issuance of amendment