

NRR-DMPSPeM Resource

From: Wengert, Thomas
Sent: Friday, March 23, 2018 8:49 AM
To: PYLE, STEPHENIE L
Cc: BICE, DAVID B (ANO); Pascarelli, Robert
Subject: ANO-2 Acceptance Review Final Supplemental Information Request - LAR to Adopt TSTF-425 Revision 3 (EPID L-2018-LLA-0047)
Attachments: ANO-2 TSTF-425 LAR Supplemental Information Request.pdf

On March 19, 2018, the U.S. Nuclear Regulatory Commission (NRC) staff sent Entergy Operations, Inc. (Entergy, the licensee) the draft Acceptance Review Supplemental Information Request identified below. This request for supplemental information relates to Entergy's licensee amendment request to adopt TSTF-425, Revision 3, for Arkansas Nuclear One, Unit 2, as described below.

On March 20, 2018, the NRC staff and the licensee held a conference call to clarify the request. During the call, the NRC staff stated that the licensee would be able to supplement its application with 13 working days of the date of the call. The licensee stated that it expected to supplement its application by March 26, 2018. A publicly available version of this final request (attached with "Draft" removed) will be placed in the NRC's Agencywide Documents Access and Management System (ADAMS).

Contact me if you have any questions.

Tom Wengert
USNRC
Project Manager – Arkansas Nuclear One
NRR/DORL/LPL4
(301) 415-4037

From: Wengert, Thomas
Sent: Monday, March 19, 2018 1:37 PM
To: 'PYLE, STEPHENIE L'
Cc: 'BICE, DAVID B (ANO)' ; Pascarelli, Robert
Subject: ANO-2 Acceptance Review Draft Supplemental Information Request - LAR to Adopt TSTF-425 Revision 3 (EPID L-2018-LLA-0047)

By letter dated February 6, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18038B354), Entergy Operations, Inc. (Entergy) requested an amendment to the technical specifications (TSs) for Facility Operating License No. NPF-6 for Arkansas Nuclear One, Unit 2 (ANO-2). The proposed amendment would modify that ANO-2 TSs by relocating specific surveillance frequencies to a licensee-controlled program with the adoption of Technical Specification Task Force (TSTF)-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5." The proposed amendment would also add a new program, the Surveillance frequency Control Program, to TS Section 6.0, Administrative Controls.

To complete its acceptance review of this application, the Nuclear Regulatory Commission (NRC) staff requires supplemental information, as described in the attached draft supplemental information request. In accordance with Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-109, Revision 2, "Acceptance Review Procedures," dated January 16, 2017 (ADAMS Accession No. ML16144A521), Enclosure 2, "Guide for Performing Acceptance Reviews," Section 4.1, "Discussion of Information Insufficiencies with the Licensee," a conference call should be arranged with the NRC staff no more than 5 working days from this notification to

discuss the information required to supplement the application. The licensee may supplement the application within 13 working days following the conference call, as described in LIC-109, Revision 2.

If you have any questions, please contact me at (301) 415-4037.

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Priority: Standard
Return Notification: No
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SUPPLEMENTAL INFORMATION NEEDED
LICENSE AMENDMENT REQUEST REGARDING
ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE (TSTF)-425 REVISION 3
RENEWED FACILITY OPERATING LICENSE NO. NPF-6
ENTERGY OPERATIONS, INC.
ARKANSAS NUCLEAR ONE, UNIT 2
DOCKET NO. 50-368

By letter dated February 6, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18038B354), Entergy Operations, Inc. (the licensee) submitted a license amendment request (LAR) that proposed changes to the Arkansas Nuclear One, Unit 2 (ANO-2) technical specifications (TSs). The proposed amendment would modify TSs by relocating specific surveillance frequencies to a licensee-controlled program with the adoption of Technical Specification Task Force (TSTF)-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – Risk Informed Technical Specification Task Force (RITSTF) Initiative 5." The proposed amendment would also add a new program, the Surveillance frequency Control Program, to TS Section 6.0, Administrative Controls."

The Nuclear Regulatory Commission (NRC) staff performed an acceptance review of the LAR in accordance with Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-109, Revision 2, "Acceptance Review Procedures," dated January 16, 2017 (ADAMS Accession No. ML16144A521), and determined that the application is unacceptable for review with opportunity to supplement because it is missing a significant analysis and, therefore, is lacking completeness of scope. The following information should be included in the licensee's supplement to the LAR to allow the NRC to begin its review.

Request for Supplemental Information

The most recent update of the ANO-2 probabilistic risk assessment (PRA) model and its technical content was constructed and documented to meet ASME/ANS PRA standard ASME/ANS RA-Sa-2009, "Standard for Level 1/Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications," February 2009. In Attachment 2 to the LAR, Section 3.1, Page 5 of 82, the licensee states, in part, that, "The internal flood model upgrade was developed in 2016, underwent a focused-scope peer review in early 2017, and unresolved facts and observations (F&Os) are currently being addressed."

In Attachment 2, Page 36 of 82 of the LAR, the licensee states that the large early release frequency (LERF) model was not considered in the Internal Flooding PRA, and the LAR does not present the results of its peer review. Consistent with Regulatory Position 4.2 of Regulatory Guide (RG) 1.200 and with Regulatory Issue Summary 2007-06, "Regulatory Guide 1.200 Implementation," please provide the necessary documentation to demonstrate the technical adequacy of the licensee's PRA with respect to RG 1.200, Rev. 2, as addressed below.

1. Provide a description of the LERF analysis that was considered in the 2016 Internal Flooding PRA and describe the adjustments made to the Internal Events LERF model to develop the Internal Flooding LERF model.
2. Provide details of all changes that have been made to the LERF model since it was developed, justifying that no changes constitute a PRA upgrade as defined in the ASME/ANS PRA standard.
3. If any changes do constitute an upgrade, provide the results of a focused-scope peer review complete with Facts & Observations, dispositions, and address any effects on the application.