



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 19, 2018

ANO Site Vice President
Arkansas Nuclear One
Entergy Operations, Inc.
N-TSB-58
1448 S.R. 333
Russellville, AR 72802

SUBJECT: ARKANSAS NUCLEAR ONE, UNIT 1 - SUPPLEMENTAL INFORMATION
NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING ACTION RE:
ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE (TSTF)
TRAVELER TSTF-425, REVISION 3 (EPID L-2018-LLA-0063)

Dear Sir or Madam:

By letter dated March 12, 2018 (Agencywide Documents Access and Management System Accession No. ML18071A319), Entergy Operations, Inc. (Entergy) submitted a license amendment request for Arkansas Nuclear One, Unit 1 (ANO-1). The proposed amendment would modify the ANO-1 Technical Specifications (TSs) by relocating specific surveillance frequencies to a licensee-controlled program with the adoption of Technical Specifications Task Force (TSTF) Traveler TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk-Informed TSTF] Initiative 5b." The proposed amendment would also add a new program, the Surveillance Frequency Control Program, to TS Section 5.5, "Programs and Manuals."

The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.


The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that Entergy supplement the application to address the information requested in the enclosure by May 9, 2018. This will enable the NRC staff to begin its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated timeframe in this letter were discussed with Mr. David Bice of your staff on April 19, 2018.

If you have any questions, please contact me at (301) 415-4037 or by e-mail at Thomas.Wengert@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas J. Wengert". The signature is fluid and cursive, with the first name being the most prominent.

Thomas J. Wengert, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-313

Enclosure:
Supplemental Information Needed

cc: Listserv

SUPPLEMENTAL INFORMATION NEEDED
LICENSE AMENDMENT REQUEST REGARDING
ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER
TSTF-425, REVISION 3
ENTERGY OPERATIONS, INC.
ARKANSAS NUCLEAR ONE, UNIT 1
DOCKET NO. 50-313

By letter dated March 12, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18071A319), Entergy Operations, Inc. (the licensee) submitted a license amendment request (LAR) that proposed changes to the Arkansas Nuclear One, Unit 1 (ANO-1) Technical Specifications (TSs). The proposed amendment would modify TSs by relocating specific surveillance frequencies to a licensee-controlled program with the adoption of Technical Specifications Task Force (TSTF) Traveler TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk-Informed TSTF] Initiative 5b." The proposed amendment would also add a new program, the Surveillance Frequency Control Program, to TS Section 5.5, "Programs and Manuals."

The U.S. 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-1 probabilistic risk assessment (PRA) model and its technical content was constructed and documented to meet American Society of Mechanical Engineers/American Nuclear Society (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," dated February 2009. In Attachment 2 to the LAR, Section 3.1, page 5 of 102, the licensee states, in part, "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 37 of 102 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, Revision 2, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities (ADAMS Accession No. ML090410014) and Regulatory Issue Summary 2007-06, "Regulatory Guide 1.200 Implementation" (ADAMS Accession No. ML070650428), please provide the necessary

Enclosure

documentation to demonstrate the technical adequacy of the licensee's PRA with respect to RG 1.200, Revision 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 F&Os and dispositions, and address any effects on the application.

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TRAVELER TSTF-425, REVISION 3 (EPID L-2018-LLA-0063)
DATED APRIL 19, 2018

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ADAMS Accession No. ML18108A295

*via e-mail

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