

## **NRR-DMPSPEm Resource**

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**From:** Wengert, Thomas  
**Sent:** Tuesday, April 16, 2019 12:59 PM  
**To:** Arnold, Timothy  
**Cc:** Halter, Mandy; Pyle, Stephenie; BICE, DAVID B (ANO); Pascarelli, Robert  
**Subject:** ANO-2 Final RAI RE: LAR to Add TS Actions to Address Inoperability of the Containment Building Sump (EPID L-2018-LLA-0573)  
**Attachments:** ANO-2 Final RAI - LAR to Add TS Actions to Address Containment Bldg Sump Inoperabilty.pdf

On April 15, 2019, the U.S. Nuclear Regulatory Commission (NRC) staff sent Entergy Operations, Inc. (the licensee) the draft Request for Additional Information (RAI) identified below. This RAI relates to the license amendment request to establish Technical Specification (TS) Actions and Allowable Outage Times applicable to conditions where the ANO-2 containment building sump is inoperable, for Arkansas Nuclear One, Unit 2 (ANO-2), as described below.

On April 16, 2019, the NRC staff held a conference call with the licensee staff to clarify this request. At the conclusion of the call, the licensee agreed to provide a response to this RAI within 30 days of this correspondence. A publicly available version of this final RAI (attached with "Draft" removed) will be placed in the NRC's Agencywide Documents Access and Management System (ADAMS).

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**From:** Wengert, Thomas  
**Sent:** Monday, April 15, 2019 8:46 AM  
**To:** Arnold, Timothy  
**Cc:** BICE, DAVID B (ANO) ; Halter, Mandy ; Pyle, Stephenie ; Pascarelli, Robert  
**Subject:** ANO-2 Draft RAI RE: LAR to Add TS Actions to Address Inoperability of the Containment Building Sump (EPID L-2018-LLA-0573)

By letter dated December 19, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18353B049), Entergy Operations, Inc. (the licensee) submitted a license amendment request for Arkansas Nuclear One, Unit 2 (ANO-2) for U.S. Nuclear Regulatory Commission (NRC) approval. The proposed amendment would establish Technical Specification (TS) Actions and Allowable Outage Times applicable to conditions where the ANO-2 containment building sump is inoperable. The proposed changes are similar to those associated with Technical Specifications Task Force (TSTF)-567-A, Revision 1, "Add Containment Sump TS to Address GSI-191 Issues" (ADAMS Accession No. ML18116A606).

The NRC staff has reviewed the application and determined that additional information is required to complete its review, as described in the attached draft Request for Additional Information (RAI). This RAI is identified as draft at this time to confirm your understanding of the information that the NRC staff needs to complete its evaluation. If this request for information is understood, please respond to this RAI within 30 days of the date of this request. Please contact me if you would like to arrange a conference call to clarify this request.

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



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**Subject:** ANO-2 Final RAI RE: LAR to Add TS Actions to Address Inoperability of the Containment Building Sump (EPID L-2018-LLA-0573)  
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**Received Date:** 4/16/2019 12:58:00 PM  
**From:** Wengert, Thomas

**Created By:** Thomas.Wengert@nrc.gov

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Tracking Status: None

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OFFICE OF NUCLEAR REACTOR REGULATION  
REQUEST FOR ADDITIONAL INFORMATION REGARDING  
LICENSE AMENDMENT REQUEST TO ADD TECHNICAL SPECIFICATION ACTIONS TO  
ADDRESS INOPERABILITY OF THE CONTAINMENT BUILDING SUMP  
ENTERGY OPERATIONS, INC.  
ARKANSAS NUCLEAR ONE, UNIT 2  
DOCKET NO. 50-368

By letter dated December 19, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18353B049), Entergy Operations, Inc. (the licensee) submitted a license amendment request (LAR) for Arkansas Nuclear One, Unit 2 (ANO-2) for U.S. Nuclear Regulatory Commission (NRC) approval. The proposed amendment would establish Technical Specification (TS) Actions and Allowable Outage Times applicable to conditions where the ANO-2 containment building sump is inoperable. The proposed changes are similar to those associated with Technical Specifications Task Force (TSTF)-567-A, Revision 1, "Add Containment Sump TS to Address GSI-191 Issues" (ADAMS Accession No. ML18116A606). The NRC staff has reviewed the application and determined that additional information is required to complete its review, as described below.

**Request for Additional Information (RAI)-1**

The licensee's proposed new TS 3.6.4.1, ACTION "a" states, in part:

With the containment sump inoperable due to containment accident generated and transported debris exceeding the analyzed limits, LCO 3.5.2, "ECCS Subsystems –  $T_{avg} \geq 300$  °F," LCO 3.5.3, "ECCS Subsystems –  $T_{avg} < 300$  °F," and LCO 3.6.2.1, "Containment Spray System, "**may be considered met** [*emphasis added*] provided: [...]"

For clarity of the TSs, consider revising new proposed ACTION "a" with respect to (non) entry into the ACTIONS of LCOs 3.5.2, 3.5.3, and 3.6.2.1, in lieu of meeting the respective LCOs, as currently proposed.

**RAI-2**

The licensee's proposed new TS 3.6.4.1, Action "a.3" states:

3. The containment sump to restored to OPERABLE status within 90 days.

The proposed sentence appears to be missing a word or words. Please modify proposed ACTION "a.3" to enhance the clarity of the TSs.

**Regulatory Basis:**

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(c)(2)(i) states, in part:

Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met. [...]

Additional information is requested so that the NRC staff can ensure that the proposed TS changes, if approved, will be adequately implemented.