Entergy Operations, Inc.
1340 Echelon Parkway
Jackson, MS 39213
Tel 601-368-5138

Ron Gaston
Director, Nuclear Licensing

10 CFR 50.90

1CAN101903

October 23, 2019

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

Subject: Supplement to License Amendment Request
Application to Revise Technical Specifications to Adopt TSTF-439, "Eliminate
Second Completion Times Limiting Time from Discovery of Failure to Meet an
LCO"

Arkansas Nuclear One, Unit 1
NRC Docket No. 50-313
Renewed Facility Operating License No. DPR-51

By letter dated March 25, 2019 (Reference 1), Entergy Operations, Inc. (Entergy) submitted a
request for an amendment to the Technical Specifications (TSs) for Arkansas Nuclear One,
Unit 1 (ANO-1). The proposed amendment would adopt previously NRC-approved
Industry/Technical Specifications Task Force (TSTF) Traveler 439 (TSTF-439), Revision 2,
"Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO".
TSTF-439 has been incorporated into NUREG-1430, "Standard Technical Specifications for
Babcock & Wilcox Plants," Revision 4.

Subsequent to the Reference 1 request, the NRC approved TSTF-529, "Clarify Use and
Application Rules," Revision 4, for ANO-1 via TS Amendment 265 (Reference 2). The approval
of this amendment changed some TS pages previously provided in the TSTF-439 Reference 1
letter. Therefore, new markup and revised (clean) TS pages (Pages 1.3-3, 1.3-5, and 1.3-6)
that were affected by approval of TS Amendment 265 are included in Attachments 1 and 2 of
this letter.

Information modified or deleted in the TS Bases markups of the original TSTF-439 amendment
request (Reference 1) is not affected by TS Amendment 265 and, therefore, new TS Bases
markup pages are not included in this submittal.

However, TS Amendment 265 affected the page numbering of TS Section 1.3. Therefore, the new TS page markups and revised pages included in this submittal contain new page numbers as follows:

Reference 1 TS Page #	Supplement TS Page #
1.3-2	1.3-3
1.3-6	1.3-5
1.3-7	1.3-6

Approval of the proposed amendment is requested by April 1, 2020. Once approved, the amendment shall be implemented within 90 days.

This letter has no impact on the No Significant Hazards Consideration provided in the original Reference 1 letter requesting adoption of TSTF-439.

No new regulatory commitments are included in this amendment request.

In accordance with 10 CFR 50.91, Entergy is notifying the State of Arkansas of this supplemental letter by transmitting a copy of this letter and enclosure to the designated State Official.

If there are any questions or if additional information is needed, please contact Tim Arnold at 479-858-7826.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on October 23, 2019.

Respectfully,

ORIGINAL SIGNED BY RON GASTON

Ron Gaston

RWG/dbb

Attachments:

1. Affected Technical Specification Pages (Mark-Up)
2. Affected Technical Specification Pages (Revised)

REFERENCES: 1.   Entergy Operations, Inc. letter to U. S. Nuclear Regulatory Commission, *License Amendment Request – Application to Revise Technical Specifications to Adopt TSTF-439, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO"* (1CAN031901) (ML19084A217), dated March 25, 2019.

          2.   U. S. Nuclear Regulatory Commission to Entergy Services, LLC, *Arkansas Nuclear One, Units 1 and 2; Grand Gulf Nuclear Station, Unit 1; Indian Point Nuclear Generating Unit Nos. 2 and 3; Palisades Nuclear Plant; River Bend Station, Unit 1; Waterford Steam Electric Station, Unit 3 – Re: Issuance of Amendments to Adopt TSTF-529, "Clarify Use and Application Rules"* (EPID L-2019-LLA-0013) (0CNA091901) (ML19175A042), dated September 11, 2019.

cc: NRC Region IV Regional Administrator

       NRC Senior Resident Inspector – Arkansas Nuclear One

       NRC Project Manager – Arkansas Nuclear One

       Designated Arkansas State Official

Attachment 1 to

1CAN101903

Affected Technical Specification Pages (Mark-Up)

(3 pages)

1.3   Completion Times (continued)

DESCRIPTION (continued)

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ." ~~Example 1.3-3 illustrates one use of this type of Completion Time. The 10 day Completion Time specified for Conditions A and B in Example 1.3-3 may not be extended.~~

EXAMPLES

The following examples illustrate the use of Completion Times with different types of Conditions and changing Conditions.

EXAMPLE 1.3-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 5.	6 hours 36 hours

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

The Required Actions of Condition B are to be in MODE 3 within 6 hours AND in MODE 5 within 36 hours. A total of 6 hours is allowed for reaching MODE 3 and a total of 36 hours (not 42 hours) is allowed for reaching MODE 5 from the time that Condition B was entered. If MODE 3 is reached within 3 hours, the time allowed for reaching MODE 5 is the next 33 hours because the total time allowed for reaching MODE 5 is 36 hours.

If Condition B is entered while in MODE 3, the time allowed for reaching MODE 5 is the next 36 hours.

1.3   Completion Times

EXAMPLES (continued)

On restoring one of the pumps to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first pump was declared inoperable. This Completion Time may be extended if the pump restored to OPERABLE status was the first inoperable pump. A 24 hour extension to the stated 7 days is allowed, provided this does not result in the second pump being inoperable for > 7 days.

EXAMPLE 1.3-3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Function X train inoperable.	A.1 Restore Function X train to OPERABLE status.	7 days ~~AND~~ ~~10 days from discovery of failure to meet the LCO~~
B. One Function Y train inoperable.	B.1 Restore Function Y train to OPERABLE status.	72 hours ~~AND~~ ~~10 days from discovery of failure to meet the LCO~~
C. One Function X train inoperable. AND One Function Y train inoperable.	C.1 Restore Function X train to OPERABLE status. OR C.2 Restore Function Y train to OPERABLE status.	72 hours 72 hours

1.3   Completion Times

EXAMPLES (continued)

When one Function X train and one Function Y train are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each train starting from the time each train was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second train was declared inoperable (i.e., the time the situation described in Condition C was discovered).

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured from the time the affected train was declared inoperable (i.e., initial entry into Condition A).

It is possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. However, doing so would be inconsistent with the basis of the Completion Times. Therefore, there shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended. The Completion Times of Conditions A and B are modified by a logical connector, with a separate 10 day Completion Time measured from the time it was discovered the LCO was not met. In this example, without the separate Completion Time, it would be possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. The separate Completion Time modified by the phrase "from discovery of failure to meet the LCO" is designed to prevent indefinite continued operation while not meeting the LCO. This Completion Time allows for an exception to the normal "time zero" for beginning the Completion Time "clock." In this instance, the Completion Time "time zero" is specified as commencing at the time the LCO was initially not met, instead of at the time the associated Condition was entered.

Attachment 2 to

1CAN101903

Affected Technical Specification Pages (Revised)

(3 Pages)

1.3   Completion Times (continued)

DESCRIPTION (continued)

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ."

EXAMPLES

The following examples illustrate the use of Completion Times with different types of Conditions and changing Conditions.

EXAMPLE 1.3-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 5.	6 hours 36 hours

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

The Required Actions of Condition B are to be in MODE 3 within 6 hours AND in MODE 5 within 36 hours. A total of 6 hours is allowed for reaching MODE 3 and a total of 36 hours (not 42 hours) is allowed for reaching MODE 5 from the time that Condition B was entered. If MODE 3 is reached within 3 hours, the time allowed for reaching MODE 5 is the next 33 hours because the total time allowed for reaching MODE 5 is 36 hours.

If Condition B is entered while in MODE 3, the time allowed for reaching MODE 5 is the next 36 hours.

1.3   Completion Times

EXAMPLES (continued)

On restoring one of the pumps to OPERABLE status, the Condition A
Completion Time is not reset, but continues from the time the first pump
was declared inoperable. This Completion Time may be extended if the
pump restored to OPERABLE status was the first inoperable pump. A
24 hour extension to the stated 7 days is allowed, provided this does not
result in the second pump being inoperable for > 7 days.

EXAMPLE 1.3-3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Function X train inoperable.	A.1 Restore Function X train to OPERABLE status.	7 days
B. One Function Y train inoperable.	B.1 Restore Function Y train to OPERABLE status.	72 hours
C. One Function X train inoperable. AND One Function Y train inoperable.	C.1 Restore Function X train to OPERABLE status. OR C.2 Restore Function Y train to OPERABLE status.	72 hours 72 hours

1.3   Completion Times

EXAMPLES (continued)

When one Function X train and one Function Y train are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each train starting from the time each train was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second train was declared inoperable (i.e., the time the situation described in Condition C was discovered).

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured from the time the affected train was declared inoperable (i.e., initial entry into Condition A).

It is possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. However, doing so would be inconsistent with the basis of the Completion Times. Therefore, there shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended.