

November 8, 1995

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U. S. Nuclear Regulatory Commission Document Control Desk Mail Station P1-137 Washington, DC 20555

Subject:

Arkansas Nuclear One - Units 1 and 2

Docket Nos. 50-313 and 50-368 License Nos. DPR-51 and NPF-6

Severe Accident Issue Closure Guidelines

Gentlemen:

The purpose of this letter is to inform the Staff that Entergy Operations at Arkansas Nuclear One (ANO) intends to implement the formal industry position on severe accident management approved by the Nuclear Energy Institute's (NEI) Strategic Issues Advisory Committee. That formal position, previously communicated in a letter dated November 21, 1994, from NEI to the Director, Office of Nuclear Reactor Regulation, states that each licensee will:

- Assess current capabilities to respond to severe accident conditions using Section 5 of NEI 91-04, Revision 1, "Severe Accident Issue Closure Guideline."
- Implement appropriate improvements identified in the assessment within the constraints of
 existing personnel and hardware, on a schedule to be determined by each licensee and
 communicated to the NRC, but in any event no later than December 31, 1998.

Based on previous interactions between NEI and the Staff, Entergy Operations understands that the Staff agrees with the need for licensee flexibility in their methods of assessing and establishing severe accident management guidance. Entergy Operations has participated in the development of generic severe accident management guidelines with the owners groups for both of the ANO units. We have expended considerable resources to support the development of these generic technical bases and guidelines and are on track to implement a severe accident program consistent with the material developed by the respective owners groups in the time frame specified above. Utilizing the associated implementing guidance contained in NEI Report 91-04, Revision 1, Entergy Operations intends to complete the assessment of severe accident management capabilities and make necessary reasonable enhancements by December 15, 1998, at ANO.



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It should be noted that there is still some uncertainty regarding NRC expectations of licensee implementation of severe accident management guidelines. Initially, it was understood that the NRC audits would be performance-based, but would also include an assessment of licensee implementation of program elements defined in the industry position. The actions that we have taken to this point and the above commitment are based largely on that understanding. Discussions at the most recent meetings with the Staff seemed to indicate a more formal and rigorous implementation and inspection process were being considered. Further discussions would be beneficial if the Staff determines it is appropriate to issue final guidance that differs from the initially agreed upon approach. Should you have any questions, please contact me.

Very truly yours,

Dwight C. Mims

Director, Nuclear Safety

DCM/nbm

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