



**Entergy
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Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 & 50-368
License Nos. DPR-51 & NPF-6
Elimination of Requirements
Marginal to Safety Comments

Gentlemen:

In Federal Register Notice of February 4, 1992, the NRC was seeking comments on the results, conclusions, and planned actions of its program to eliminate requirements marginal to safety. The following comments are being submitted on behalf of Entergy Operations at Arkansas Nuclear One (ANO).

The first two comments are to address those specific regulations discussed in the Federal Register Notice. The remainder of the comments involve concerns of a broader nature as solicited in the "Comments Requested" section of the Federal Register Notice.

- 1) 10CFR50 Appendix R - Since the majority of all nuclear power plants already conform to these requirements, decreasing the prescriptiveness of the regulation should prove minimal, except for possible site modifications or new facilities. If regulations are going to be rewritten, the revision should be in an easy to read format and written so as to avoid the need to issue other documents attempting to explain the intent or provide examples on the regulations. This approach is believed to be a positive step since more flexibility would be afforded the utility with respect to complying with the goals established by the NRC. It could more than likely hinder NRC inspection efforts since each utility may develop a unique method of complying with the goals unless clear guidance is provided in inspection manuals regarding the approach.

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- 2) 10CFR50 Appendix J - Increasing the limits in this regulation could save critical path time during outages. The increased limits would not make an appreciable difference in the safety analyses due to the recent source term information. Making this regulation less prescriptive would be beneficial by allowing flexibility and utilization of the latest technology. This could, however, leave the utility open to increased interpretive arguments with the NRC unless inspection manuals are updated to provide clear inspection criteria.
- 3) 10CFR50.49 - The rule is unnecessarily prescriptive regarding the requirement for tested components to be pre-aged. Since pre-aging methods are limited in the reasonableness of extrapolation techniques, the regulation should allow for suitable maintenance/surveillance methods to address aging. This approach was deemed acceptable by NRC in Generic Letter 82-09 and offers a more meaningful approach in many cases to establishing suitable qualified lifetimes for equipment. The accelerated aging test creates a much more stressful testing sequence than is envisioned due to natural aging. Aging tests should be limited to be within reasonable ranges of extrapolation and should not necessarily define the maximum qualified life. Rather, they should be at most the pre-requisite for the maintenance/surveillance techniques which control end of lifetime for components.
- 4) Generic Letters 86-15 and 88-07 - These documents require special administrative attention be directed to non-conformances/deficiencies associated with environmental qualification (EQ) of electrical equipment. Such special requirements are unwarranted since EQ raises no intrinsic safety issues different from any other qualification issue such as seismic, flood, fire, etc. that may potentially impact operability. The plants' non-conformance/adverse condition programs and procedures are more than adequate for addressing operability and safety significance. The prescriptive requirement for EQ Justification of Continued Operation should not be required and is certainly considered marginal.
- 5) Reg. Guide 1.27 - There is one aspect to safety of this Reg. Guide in particular which is considered to be marginal. This requirement includes the need to assume a LOCA in one unit with shutdown of the other, loss of primary heat sink, and worst case meteorological conditions. However, even conservative assessments of the likelihood of the simultaneous occurrence of above items indicate that the risk is minimal (10^{-10} /year or less). Therefore, the criteria noted should be re-assessed in light of straightforward risk techniques which can easily demonstrate the marginal benefit of the regulation.

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In general, Entergy Operations at ANO encourages the continued NRC pursuit of performance based regulations. As noted by our comments, NRC regulations and interpretations often become too prescriptive where safety may not be the overriding goal. Also, ANO concurs with the comments submitted by NUMARC and NUBARG.

Thank you for your time and consideration of our comments. Should you have any further questions, please do not hesitate to contact me or my staff.

Very truly yours,



for James J. Flisicaro
Director, Licensing

JJF/NBM/sjf