

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON D.C. 20555

June 18, 1992

Docket Nos. 50-313 and 50-368

Mr. Neil S. Carns Vice President, Operations ANO Entergy Operations, Inc. Route 3 Box 1376 Russellville, Arkarias 72801

Dear Mr. Carns:

SUBJECT: REVIEW OF RESPONSE TO GENERIC LETTER 88-20, SUPPLEMENT NO. 4 -INDIVIDUAL PLANT EXAMINATIONS FOR EXTERNAL EVENTS - ARKANSAS NUCLEAR ONE, UNITS 1 AND 2 (ANO-1&2) (TAC NOS. M83588 AND 83589)

Supplement 4 to Generic Letter 88-20 was issued on June 28, 1991, to require each licensee and each Construction Permit holder to conduct an individual plant examination of external events (IPEEE). Guidance was provided with the generic letter supplement in the form of NUREG-1407, "Procedural and Submittal Guidance for the Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities." The supplement requested a 180-day response (December 26, 1991) that would (1) identify the method and approach selected for the IPEEE, (2) describe the method to be used if it has not previously been submitted for staff review, and (3) identify the milestones and schedule for performing the IPEEC and submittal of the results to the NRC. Licensees were requested in the supplement to submit the IPEEE results to the NRC for review by June 28, 1994 (3 years after issuance of the supplement), to ensure that the intent of the Commission's Severe Accident Policy Statement will be met by mid-1995.

We have reviewed your letter dated December 19, 1991, submitted in response to Generic Letter 88-20, Supplement 4. We find that your selected IPEEE methods are acceptable. However, your submittal did not provide projected milestones and schedules. The reason given in your submittal for not providing this information was that the staff had not issued the Supplemental Safety Evaluation Report (SSER) approving the USI A-46 Generic Implementation Procedure (GIP). This SSER was issued by the staff on May 22, 1992, via Supplement 1 to Generic Letter 87-02. Therefore, we request that you update your IPEEE plans and provide your projected milestones and schedules to the NRC no later than September 18, 1992. The basis for that response date is that those plants covered under USI A-46 are required to respond by September 18, 1992, with their USI A-46 program. Most licensees for these plants have linked their IPEEE response to USI A-46.

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If your submittal schedule is not consistent with the NRC's requested date of June 1994, you should forward your justification with sufficient discussion to provide the NRC staff with a basis for determining the acceptability of your schedules. However, we request that your submittal be provided no later than mid-1995. By doing so, your efforts will more closely reflect the level of safety significance attributed to this effort by the Commission when the goal of closing severe accident issues by June 1995 was established.

The NRC, with assistance from the Lawrence Livermore Laboratory and the utility Seismicity Owners Group, assisted by the Electric Power Research Institute, has conducted probabilistic seismic hazard studies for nuclear power plant sites east of the Rocky Mountains. Although no plants were found to have exceptional vulnerabilities, eight plants at five sites were identified as needing further evaluation by the NRC staff based on comparison of their probabilistic seismic hazard to their deterministic response spectra. ANO-1 was one of those plants so identified. The plant design is believed to meet the 10 CFR Part 50 General Design Criteria (Appendix A) and other applicable NRC regulations. The result of this review indicated that the NRC does not need to reestablish the seismic licensing basis and no immediate action on your part is necessary at this time. However, the staff will further examine the plant vulnerability with respect to seismic hazard upon receipt of your IPEEE. From that examination, the staff will have a better understanding of what seismic vulnerabilities, if any, warrant consideration for corrective action. The staff may then, if appropriate, consider backfit under 10 CFR 50.109 for proposed plant improvements.

Note that, through your IPE process, we expect that you are now familiar with Level 1 Probabilistic Risk Assessment (PRA) technology. The information you obtained and expertise you acquired through the IPE process should be used and built upon to fulfill part of the IPEEE requirements. The staff believes that, with the safety systems and equipment being identified through the IPE process, you should be able to complete the IPEEE within the requested time frame.

Sincerely.

Thomas W. alexin

Thomas W. Alexion, Project Manager Project Directorate IV-1 Division of Reactor Projects - III/IV/V Office of Nuclear Reactor Regulation

cc: See next page

Mr. Neil S. Carns Entergy Operations, Inc.

CC:

Mr. Donald C. Hintz, President and Chief Operating Officer Entergy Operations, Inc. P. O.Box 31995 Jackson, Mississippi 39286

Mr. Jerry Yelverton General Manager, Plant Operations Entergy Operations, Inc. Route 3 Box 137G Russellville, Arkansas 72801

Mr. Nicholas S. Reynolds Winston & Strawn 1400 L Street, N.W. Washington, D.C. 20005-3502

Mr. Robert B. Borsum Licensing Representative B&W Nuclear Technologies 1700 Rockville Pike, Suite 525 Rockville, Maryland 20852

Senior Resident Inspector U.S. Nuclear Regulatory Commission 1 Nuclear Plant Road Russellville, Arkansas 72801

Regional Administrator, Region IV U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

Honorable Joe W. Phillips County Judge of Pope County Pope County Courthouse Russellville, Arkansas 72801

Ms. Greta Dicus, Director Division of Radiation Control and Emergency Management Arkansas Department of Health 4815 West Markham Street Little Rock, Arkansas 72205-3867 Arkansas Nuclear One, Units 1 & 2

Mr. John R. McGaha Vice President, Operations Support Entergy Operations, Inc. P. O. Box 31995 Jackson, Mississippi 39286

Mr. Robert B. McGehee Wise, Carter, Child & Caraway P. O. Box 651 Jackson, Mississippi 39205

Mr. Charles B. Brinkman, Manager Washington Nuclear Operations ABB Combustion Engineering Nuclear Power 12300 Twinbrook Parkway, Suite 330 Rockville, Maryland 20852

Mr. James J. Fisicaro Director, Licensing Entergy Operations, Inc. Route 3, Box 137G Russellville, Arkansas 72801

Admiral Kinnaird R. McKee, USN (Ret) 214 South Morris Street Oxford, Maryland 21654

Mr. Neil S. Carns

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Sincerely,

Original signed by:

Thomas W. Alexion, Project Manager Project Directorate IV-1 Division of Reactor Projects - III/IV/V Office of Nuclear Reactor Regulation

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DATE

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