

From: Wengert, Thomas
Sent: Thursday, September 10, 2020 1:05 PM
To: Keele Jr, Riley D
Cc: BICE, DAVID B (ANO); Clark, Robert; Dixon-Herrity, Jennifer
Subject: ANO-1 and ANO-2 - Acceptance Review of Proposed Alternative to ASME Section XI Requirements for Repair/Replacement of ECP Supply Piping (L-2020-LLR-0104)

By letter July 15, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20218A672), Entergy Operations, Inc. (the licensee) submitted a request to use an alternative to certain requirements of the American Society for Mechanical Engineers (ASME), Boiler & Pressure Vessel Code, Section XI, "Rules for In-Service Inspection of Nuclear Power Plant Components." Specifically, the licensee requested approval to allow the use of a Carbon Fiber Reinforced Polymer (CFRP) Composite System for the internal repair of the emergency cooling pond (ECP) supply piping to the service water system at Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2).

The purpose of this letter is to provide the results of the Nuclear Regulatory Commission (NRC) staff's acceptance review of this alternative request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Pursuant to Sections 50.55a(a)(z)(1) and 50.55a(a)(z)(2) of Title 10 of the *Code of Federal Regulations* (10 CFR), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of Section 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed request in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated the jobhour expenditures to total approximately 875 hours. The NRC staff expects to complete this review by your requested date of August 31, 2021. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related

activities. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me at (301) 415-4037.

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

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