

From: Wengert, Thomas
Sent: Wednesday, March 10, 2021 3:17 PM
To: Keele Jr, Riley D
Cc: BICE, DAVID B (ANO); Clark, Robert; Dixon-Herrity, Jennifer
Subject: ANO-1 and ANO-2 -- Final RAI RE: Proposed Change to Quality Assurance Program Manual (EPID L-2020-LLQ-0005)
Attachments: ANO - Final RAI RE QAPM Change.pdf

On February 17, 2021, the U.S. Nuclear Regulatory Commission (NRC) staff sent Entergy Operations, Inc. (the licensee) the draft Request for Additional Information (RAI) identified below. This RAI relates to the licensee's request for NRC approval of a revision to the Entergy Quality Assurance Program Manual (QAPM), Revision 39, for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2).

The NRC staff held a conference call with the licensee staff on March 4, 2021, to clarify this request. Following the clarification call and discussion, the NRC staff determined that RAI-1 could be deleted and a clarifying sentence should be added to RAI-2. As such, the second RAI has been modified, and renumbered as RAI-1 in the final RAI (attached). Subsequent to the call, the licensee agreed to provide a response to this RAI within 30 days of this correspondence. A publicly available version of this final RAI will be placed in the NRC's Agencywide Documents Access and Management System (ADAMS).

From: Wengert, Thomas
Sent: Wednesday, February 17, 2021 11:42 AM
To: Keele Jr, Riley D
Cc: BICE, DAVID B (ANO) ; Clark, Robert ; Dixon-Herrity, Jennifer
Subject: ANO-1 and ANO-2 Draft RAI RE: Proposed Change to Quality Assurance Program Manual (EPID L-2020-LLQ-0005)

By letter dated October 26, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20300A324), Entergy Operations, Inc. (the licensee) submitted a request to the U.S. Nuclear Regulatory Commission (NRC) for approval of a revision to the Entergy Quality Assurance Program Manual (QAPM), Revision 39, for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2). The proposed revision results in a reduction in commitment to the previously accepted Quality Assurance (QA) program that was submitted for NRC review and approval in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," Section 50.54(a)(4). Specifically, the licensee's submittal requested that treatment of safety-related Class 2 and 3 structures, systems, and components (SSCs) identified as Low Safety Significance (LSS) in accordance with the American Society of Mechanical Engineers (ASME) Code Case N-752, "Risk-Informed Categorization and Treatment for Repair/ Replacement Activities in Class 2 and 3 Systems, Section XI, Division 1," not be required to meet the requirements of the QAPM. Instead, Entergy would develop program elements describing treatment of these LSS SCCs to ensure continued capability and reliability of the design basis function.

The NRC staff has determined that additional information, as described in the attached request for additional information (RAI), is required for the staff to complete its review of this application. This RAI is identified as draft at this time to confirm your understanding of the information that the NRC staff

needs to complete the evaluation. If the request for information is understood, please respond to this RAI within 30 days of the date of this request.

Please contact me if you would like to set up a conference call with the NRC staff to clarify this request for information.

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

Hearing Identifier: NRR_DRMA
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REQUEST FOR ADDITIONAL INFORMATION

PROPOSED CHANGE TO THE OPERATING QUALITY ASSURANCE PROGRAM MANUAL

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNITS 1 AND 2

DOCKET NOS. 50-313, 50-368, AND 72-13

By letter dated October 26, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20300A324), Entergy Operations, Inc. (the licensee) submitted a request to the U.S. Nuclear Regulatory Commission (NRC) for approval of a revision to the Entergy Quality Assurance Program Manual (QAPM), Revision 39, for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2). The proposed revision results in a reduction in commitment to the previously accepted Quality Assurance (QA) program that was submitted for NRC review and approval in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," Section 50.54(a)(4).

Specifically, the licensee's submittal requested that treatment of safety-related Class 2 and 3 structures, systems, and components (SSCs) identified as Low Safety Significance (LSS) in accordance with the American Society of Mechanical Engineers (ASME) Code Case N-752, "Risk-Informed Categorization and Treatment for Repair/ Replacement Activities in Class 2 and 3 Systems, Section XI, Division 1," not be required to meet the requirements of the QAPM. Instead, Entergy would develop program elements describing treatment of these LSS SSCs to ensure continued capability and reliability of the design basis function.

The NRC staff has reviewed the application and determined that the information below is needed to complete its review.

Regulatory Basis

Appendix A, "General Design Criteria [GDC] for Nuclear Power Plants," General Design Criterion 1, "Quality Standards and Records," to 10 CFR Part 50, states, in part, that "Structures, systems, and components important to safety shall be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety functions to be performed. Where generally recognized codes and standards are used, they shall be identified and evaluated to determine their applicability, adequacy, and sufficiency and shall be supplemented or modified as necessary to assure a quality product in keeping with the required safety function. A quality assurance program shall be established and implemented in order to provide adequate assurance that these structures, systems, and components will satisfactorily perform their safety functions."

ANO-1 and ANO-2 were designed and constructed to meet the intent of the GDC of the Atomic Energy Commission (AEC) as originally proposed in July 1967. Thus, ANO design and construction were initiated and proceeded to a significant extent based upon the criteria proposed in 1967. Section 1.4, "General Design Criteria," of the ANO-1 Safety Analysis Report (SAR) (ADAMS Accession No. ML17297B948) describes the manner in which the ANO-1 GDC meet the intent of the corresponding GDC published as Appendix A to 10 CFR Part 50, in 1971. Section 3.1, "Conformance with AEC General Design Criteria," of the ANO-2 SAR (ADAMS

Accession No. ML19282B426) describes the manner in which the ANO-2 GDC meet the intent of the corresponding GDC published as Appendix A to 10 CFR Part 50 in 1971.

Request for Additional Information (RAI)-1

Page 4 in Enclosure 2 of the submittal states, in part:

Based on Code Case N-752, Entergy is proposing to procure Class 2 and 3 LSS items as nonsafety-related when used in repair/replacement activities performed in accordance with Entergy's Code Case N-752 Risk-Informed Repair/Replacement Program. While this is the case, Entergy engineering will specify supplemental procurement requirements and controls, as appropriate, to confirm with reasonable confidence that Class 2 and 3 LSS items remain capable of performing their safety related functions under design-basis conditions. ...

Provide a detailed description of the supplemental procurement requirements and controls that will be specified by Entergy Engineering to confirm with reasonable assurance that Class 2 and 3 LSS SSCs will remain capable of performing their intended safety-related functions under design basis conditions. In addition, clarify whether these supplemental procurement requirements and controls will be documented in the procedures governing the treatment of Class 2 and 3 LSS SSCs under Code Case N-752. Also, confirm that the proposed revision to the QAPM will accurately reflect that current processes and procedures will be used for the treatment of the LSS SCCs, rather than suggest that program elements will be developed.