

**From:** Wengert, Thomas  
**Sent:** Wednesday, September 29, 2021 4:10 PM  
**To:** Keele Jr, Riley D  
**Cc:** Clark, Robert; REID, MARK; Dixon-Herrity, Jennifer  
**Subject:** ANO-2 Final RAI #2 RE: License Amendment Request to Adopt a Safety Function Determination Program (EPID L-2020-LLA-0252)  
**Attachments:** ANO-2 - Final RAI #2 Regarding SFDP LAR.pdf

On September 29, 2021, the U.S. Nuclear Regulatory Commission (NRC) staff sent Entergy Operations, Inc. (Entergy) the draft Request for Additional Information (RAI) identified below. This RAI relates to the November 17, 2020, license amendment request (LAR) that proposes to modify the Arkansas Nuclear One, Unit 2 (ANO-2) Technical Specifications (TSs) to incorporate the provisions of Limiting Condition for Operation (LCO) 3.0.6 of the Improved Standard Technical Specifications (ISTS), which provide the actions to be taken when the inoperability of a support system results in the inoperability of a related supported system(s). The proposed changes would add a new Safety Function Determination Program to the Administrative Controls section of the ANO-2 TSs to ensure that a loss of safety function is detected, and appropriate actions are taken, when using the provisions of LCO 3.0.6.

Entergy subsequently informed the NRC staff that the information requested was understood and that no additional clarification of the RAI was necessary. A publicly available version of this final RAI (attached with "Draft" removed) will be placed in the NRC's Agencywide Documents Access and Management System (ADAMS). As agreed, please provide a response to this RAI within 45 days of this correspondence.

---

**From:** Wengert, Thomas  
**Sent:** Wednesday, September 29, 2021 8:55 AM  
**To:** Keele Jr, Riley D <rkeele@entergy.com>  
**Cc:** Clark, Robert <RCLARK@entergy.com>; REID, MARK <mreid1@entergy.com>; Dixon-Herrity, Jennifer <Jennifer.Dixon-Herrity@nrc.gov>  
**Subject:** ANO-2 Draft RAI #2 RE: License Amendment Request to Adopt a Safety Function Determination Program (EPID L-2020-LLA-0252)

By application dated November 17, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20322A426), as supplemented by letter dated May 24, 2021 (ADAMS Accession No. ML21144A287), Entergy Operations, Inc. (the licensee) submitted a license amendment request (LAR) for Arkansas Nuclear One, Unit 2 (ANO-2). The proposed amendment would modify the ANO-2 Technical Specifications (TSs) to incorporate the provisions of Limiting Condition for Operation (LCO) 3.0.6 of the Improved Standard Technical Specifications (ISTS), which provide the actions to be taken when the inoperability of a support system results in the inoperability of a related supported system(s). The proposed changes would add a new Safety Function Determination Program to the Administrative Controls section of the TSs to ensure that a loss of safety function is detected, and appropriate actions are taken when using the provisions of LCO 3.0.6.

The U.S. Nuclear Regulatory Commission (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. As discussed, please respond to this RAI within 45 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  
**Email Number:** 1368

**Mail Envelope Properties** (MN2PR09MB544912F0935B5ADC2F9DE5B18FA99)

**Subject:** ANO-2 Final RAI #2 RE: License Amendment Request to Adopt a Safety Function Determination Program (EPID L-2020-LLA-0252)  
**Sent Date:** 9/29/2021 4:10:01 PM  
**Received Date:** 9/29/2021 4:10:00 PM  
**From:** Wengert, Thomas

**Created By:** Thomas.Wengert@nrc.gov

**Recipients:**

"Clark, Robert" <RCLARK@entergy.com>  
Tracking Status: None  
"REID, MARK" <mreid1@entergy.com>  
Tracking Status: None  
"Dixon-Herrity, Jennifer" <Jennifer.Dixon-Herrity@nrc.gov>  
Tracking Status: None  
"Keele Jr, Riley D" <rkeele@entergy.com>  
Tracking Status: None

**Post Office:** MN2PR09MB5449.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3321	9/29/2021 4:10:00 PM
ANO-2 - Final RAI #2 Regarding SFDP LAR.pdf		117753

**Options**

**Priority:** Normal  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**

REQUEST FOR ADDITIONAL INFORMATION  
PROPOSED TECHNICAL SPECIFICATION CHANGES  
TO ADOPT A SAFETY FUNCTION DETERMINATION PROGRAM  
ARKANSAS NUCLEAR ONE, UNIT 2  
DOCKET NO. 50-368

By application dated November 17, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20322A426), as supplemented by letter dated May 24, 2021 (ADAMS Accession No. ML21144A287), Entergy Operations, Inc. (the licensee) submitted a license amendment request (LAR) for Arkansas Nuclear One, Unit 2 (ANO-2). The proposed amendment would modify the ANO-2 Technical Specifications (TSs) to incorporate the provisions of Limiting Condition for Operation (LCO) 3.0.6 of the Improved Standard Technical Specifications (ISTS)<sup>1</sup>, which provide the actions to be taken when the inoperability of a support system results in the inoperability of a related supported system(s). The proposed changes would add a new Safety Function Determination Program to the Administrative Controls section of the TSs to ensure that a loss of safety function is detected, and appropriate actions are taken when using the provisions of LCO 3.0.6. The U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is needed to complete its review, as described below.

Regulatory Basis

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(b), each license authorizing operation of a utilization facility will include TSs. The TSs will be derived from the analyses and evaluations included in the safety analysis report, and amendments thereto, submitted pursuant to 10 CFR 50.34 (describing the technical information to be included in applications for an operating license). Pursuant to 10 CFR 50.36(c), TSs are required to include items in, among other things, the following five specific categories related to station operation: (1) safety limits, limiting safety system settings, and limiting control settings; (2) LCOs; (3) surveillance requirements; (4) design features; and (5) administrative controls. The Commission may include such additional TSs as it finds appropriate.

The regulation in 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," states that whenever a holder of a license desires to amend the license or permit, application for an amendment must be filed with the Commission, as specified in §§ 50.4 or 52.3 of this chapter, as applicable, fully describing the changes desired, and following as far as applicable, the form prescribed for original applications.

Background

On November 17, 2020, the licensee submitted the subject LAR described above. Subsequent to this submittal, the NRC staff issued several license amendments involving revisions to the

---

<sup>1</sup> NUREG-1432, "Standard Technical Specifications - Combustion Engineering Plants: Specifications," Rev. 4.0, Vol. 1, (ADAMS Accession No. ML12102A165), dated April 2012.

ANO-2 TSs, including two amendments<sup>2</sup> that involved changes to the some of the same TS pages' ACTION and APPLICABILITY statements that were proposed for modification in the LAR dated November 17, 2020. Due to the timing and the overlap associated with the review of the two amendments, the current wording in certain TS pages was not accurately captured in the proposed TS page markups provided with the LAR dated November 17, 2020, currently under review by the NRC staff. It is not clear to the staff whether the licensee evaluated the proposed changes to the affected TS pages with respect to the issuance of ANO-2 Amendment Nos. 322 and 325.

#### Request for Additional Information

Provide additional information describing and assessing the impact of ANO-2 Amendment Nos. 322 and 325 on the LAR under review. To fully describe the proposed changes, please submit new proposed TS page markups (to reflect the current licensing basis TSs through Amendment No. 325) for those TS pages affected by the two prior amendments.

---

<sup>2</sup> Amendment No. 322, dated October 30, 2020 (ADAMS Accession No. ML20240A280) and Amendment No. 325, dated September 20, 2021 (ADAMS Accession No. ML21208A449).