From: Wengert, Thomas
Sent: Thursday, January 13, 2022 8:13 AM
To: Keele Jr, Riley D
Cc: Clark, Robert; REID, MARK; Dixon-Herrity, Jennifer
Subject: RE: ANO Unit 2 - Acceptance of Requested Licensing Action RE: Alternative ANO2-PT-003 (EPID L-2021-LLR-0049)

Mr. Keele,

For your awareness, when the NRC staff accepted for review the subject ANO-2 Relief (Alternative) Request ANO2-PT-003, I incorrectly identified the NRC staff's expected completion date as August 31, 2022, as seen in the acceptance review email below. I should have identified the expected completion date as July 20, 2022. The NRC staff will be targeting this date for completion of its review of the relief request.

Contact me if you have any questions or concerns.

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

From: Wengert, Thomas
Sent: Tuesday, July 20, 2021 2:25 PM
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 Unit 2 - Acceptance of Requested Licensing Action RE: Alternative ANO2-PT-003 (EPID L-2021-LLR-0049)

By letter dated June 29, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21180A435), Entergy Operations, Inc. (the licensee) submitted an alternative request (ANO2-PT-003) for Arkansas Nuclear One, Unit 2 (ANO-2). Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(a)(z)(2), the licensee has requested approval of the proposed alternative to the requirements of the American Society for Mechanical Engineers (ASME) Section XI IWB-5222(b) for ANO-2, on the basis that compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Subarticle IWB-5222(b) requires, in part, that the Class 1 pressure boundary during the system leakage test conducted at or near the end of each inspection interval shall extend to all Class 1 pressure retaining components. Relief Request ANO2-PT-003 proposes to visually examine the extended reactor coolant pressure boundary piping between the first and second normally closed isolation valves during the system leakage test using Class 2 conditions in the last period of the inspection interval.

The purpose of this letter is to provide the results of the U.S. 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 10 CFR 50.55a(a)(z)(1) and 10 CFR 50.55a(a)(z)(2), an applicant or licensee shall demonstrate that the proposed alternative 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 relief/alternative 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 that this licensing request will take approximately 100 hours to complete. The NRC staff expects to complete this review by your requested date of August 31, 2022. 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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"Clark, Robert" <RCLARK@entergy.com>
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"REID, MARK" <mreid1@entergy.com>
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"Dixon-Herrity, Jennifer" <Jennifer.Dixon-Herrity@nrc.gov>
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