

From: Wengert, Thomas
Sent: Tuesday, March 22, 2022 2:18 PM
To: Keele Jr, Riley D
Cc: Clark, Robert; Dixon-Herrity, Jennifer
Subject: ANO-2 - Acceptance Review of Relief Requests ANO2-ISI-023, -024, -025, -026, -027, and -028 (EPIDs: L-2022-LLR-022, -023, -024, -025, -026, and -027)

By letter dated February 24, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22055B120), Entergy Operations, Inc. (the licensee) requested that, pursuant to Section 50.55a(g)(6)(iii) of Title 10 of the *Code of Federal Regulations* (10 CFR), the Nuclear Regulatory Commission (NRC) grant relief from certain inservice inspection (ISI) requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, pertaining to the limited surface and volumetric examinations for the fourth 10-Year ISI interval for Arkansas Nuclear One, Unit 2 (ANO-2), on the basis that the ISI requirements are impractical. Specifically, the licensee submitted the following six relief requests:

- ANO2-ISI-023, Full Penetration Welded Nozzles in Vessels
- ANO2-ISI-024, Pressure Retaining Nozzle Welds in Control Element Drive Mechanism Housing
- ANO2-ISI-025, Pressure Retaining Nozzle Welds in Vessels [Item No. C1.10]
- ANO2-ISI-026, Pressure Retaining Nozzle Welds in Vessels [Item No. C2.21]
- ANO2-ISI-027, Integral Attachments for Vessels, Piping, Pumps, and Valves
- ANO2-ISI-028, High Safety Significant Class 1 and 2 Piping Welds

The purpose of this e-mail is to provide the results of the NRC staff's acceptance reviews of these relief requests. The acceptance reviews were 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.

The regulation in 10 CFR 50.55a(g)(5)(iii) requires licensees to notify the NRC and submit supporting information, if it has determined that conformance with a code requirement is impractical for its facility. Pursuant to 10 CFR 50.55a(g)(6)(i), the NRC will evaluate the licensee's determination that the code requirements are impractical. The NRC may grant relief and may impose alternative requirements as it determines are authorized by law, will not endanger life or property or the common defense and security, and are otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

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 requests 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 450 hours for the six requests. The NRC staff expects to complete this review by January 23, 2023. 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.

Tom Wengert
Project Manager – Arkansas Nuclear One
NRC/NRR/DORL/LPL4
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