

NRR-PMDAPEm Resource

From: George, Andrea
Sent: Thursday, March 10, 2016 10:11 AM
To: BICE, DAVID B (ANO)
Cc: PYLE, STEPHENIE L
Subject: 4th Round Request for Additional Information - ANO-1 NFPA 805 LAR - TAC No. MF3419
Attachments: MF3419 - 4th Round RAI.docx
Importance: High

Mr. Bice,

By letter dated January 29, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14029A438), as supplemented by letters dated May 19, June 16, July 21, August 12, September 22, November 4, and November 17, 2015; and January 15, 2016 (ADAMS Accession Nos. ML15139A196, ML15167A503, ML15203A205, ML15224A729, ML15265A113, ML15308A452, ML15321A076, and ML16015A421, respectively), Entergy Operations, Inc. (the licensee), submitted a license amendment request (LAR) to change the Arkansas Nuclear One, Unit 1 (ANO 1), fire protection program to one based on the National Fire Protection Association Standard 805 (NFPA 805), "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants," 2001 Edition, as incorporated into Title 10 of the Code of Federal Regulations (10 CFR) Section 50.48(c).

In the course of its review, the U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is required in order to complete its evaluation. This fourth round RAI was provided to your staff in draft form via email on 3/10/16, and your response dated 3/10/16 stated that a clarification was not needed. It was agreed that a response would be provided by April 25, 2016. Please treat this correspondence as official transmittal of this RAI. If there are any issues with meeting this date, please contact me via phone or email. Please confirm receipt of this email.

Sincerely,

Andrea George
Project Manager
Division of Operating Reactor Licensing
U.S. Nuclear Regulatory Commission
301-415-1081

Hearing Identifier: NRR_PMDA
Email Number: 2701

Mail Envelope Properties (Andrea.George@nrc.gov20160310101100)

Subject: 4th Round Request for Additional Information - ANO-1 NFPA 805 LAR - TAC No. MF3419
Sent Date: 3/10/2016 10:11:12 AM
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From: George, Andrea

Created By: Andrea.George@nrc.gov

Recipients:
"PYLE, STEPHENIE L" <SPYLE@entergy.com>
Tracking Status: None
"BICE, DAVID B (ANO)" <DBICE@entergy.com>
Tracking Status: None

Post Office:

Files	Size	Date & Time
MESSAGE	1643	3/10/2016 10:11:00 AM
MF3419 - 4th Round RAI.docx	17939	

Options
Priority: High
Return Notification: No
Reply Requested: Yes
Sensitivity: Normal
Expiration Date:
Recipients Received:

REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST TO TRANSITION FIRE PROTECTION PROGRAM TO
NATIONAL FIRE PROTECTION ASSOCIATION STANDARD 805 (NFPA 805)
RENEWED FACILITY OPERATING LICENSE NO. DPR-51
ENTERGY OPERATIONS, INC.
ARKANSAS NUCLEAR ONE, UNIT NO. 1
DOCKET NO. 50-313

PRA RAI 19

In Section 4.5.1.1 of the license amendment request (LAR) dated January 29, 2014 (ADAMS Accession No. ML14029A438), the licensee states that the “ANO-1 base internal events PRA (ANO-1 PSA Model 4p00) was the starting point for the Fire PRA.” It is unclear to the U.S. Nuclear Regulatory Commission (NRC) staff when this internal events PRA model was last updated to incorporate changes to the plant and procedures unrelated to NFPA-805. In Section 4.8.2 of the LAR dated January 29, 2014, the licensee also states that following installation of the modifications in Table S-1 of Attachment S to the LAR, additional updates to the Fire PRA model may be necessary. In Table S-2 of Attachment S to the LAR, Implementation Item S2-9, the licensee states that the PRA model update “will be performed in accordance with Entergy fleet PSA Maintenance procedure EN-DC-151, Section 5.2.”

Please describe how the procedures in Entergy fleet PSA procedure EN-DC-151 will ensure that the risk contribution from plant modifications and changes unrelated to NFPA-805, included together with the modifications and changes listed in Attachment S to the LAR, will “ensure the as-built change-in-risk” will not “exceed the PRA model change-in-risk estimates reported in the LAR,” as stated in Implementation Item S2-9.