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**Jeremy G. Browning**  
Site Vice President  
Arkansas Nuclear One

OCAN051606

May 31, 2016

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

SUBJECT: Generic Letter (GL) 2004-02 Commitment Extension  
Arkansas Nuclear One – Units 1 and 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6

- REFERENCES:
1. Entergy Letter to NRC, GL 2004-02 Closure Extension, dated November 26, 2014 (OCAN111402) (ML14330A638)
  2. NRC Letter to Pressurized Water Reactor Owners Group (PWROG), *Request for Additional Information Re: PWROG Topical Report WCAP-17788, "Comprehensive Analysis and Test Program for GSI-191 Closure,"* dated April 13, 2016 (TAC No. MF6536) (ML16070A255)
  3. Entergy letter to NRC, *GL 2004-02 Closure Option*, dated May 16, 2013 (OCAN051301) (ML13137A126)
  4. NRC Letter to Entergy, *Arkansas Nuclear One, Units 1 and 2 – GL 2004-02 Supplemental Response*, dated January 26, 2010 (OCNA011002) (ML100190320)

Dear Sir or Madam:

In accordance with Reference 1 Entergy Operations, Inc. (Entergy) committed to complete bypass re-testing and incorporate results into Arkansas Nuclear One (ANO) calculations to support closure of GL 2004-02 by June 15, 2016. Due to the reasons discussed below, it is necessary to extend this date.

In order to complete bypass re-testing, small-scale testing followed by large-scale testing is necessary. The purpose of the small-scale testing is to eliminate variables in order to reduce the amount of the more expensive large-scale testing. The small-scale test report was received on November 23, 2015. Also, the PWROG has performed in-vessel testing to provide plant-specific in-vessel fiber limits. The results from the PWROG have

been submitted to the NRC as WCAP-17788; however, the NRC has issued requests for additional information to the PWROG which are currently due in August 2016 (Reference 2).

In addition, Entergy's vendor is experiencing resource issues due to testing demands from the industry and is not able to perform the large-scale testing for ANO until 2017. Subsequent to successful large-scale testing, Entergy still needs to revise the downstream effects calculations. Therefore due to Entergy's vendor schedule and the PWROG finalization of WCAP-17788, an extension until December 15, 2017, is needed to complete the large-scale bypass re-testing and incorporate the results into ANO calculations. This has been discussed with the NRR staff on May 23, 2016.

Reference 4 remains valid as supported by References 1 and 3, and the defense-in-depth measures described in Reference 3 continue to remain in place, thus providing a basis for the units' safe continued operation in the interim period.

Based on extension of the bypass re-testing completion, two commitments from Reference 1 require revision and are included in the attachment. Should you have any questions concerning the content of this letter, please contact Stephenie Pyle at 479.858.4704.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 31, 2016.

Sincerely,

**ORIGINAL SIGNED BY JEREMY G. BROWNING**

JGB/nbm

Attachment: List of Regulatory Commitments

cc: Mr. Marc Dapas  
Regional Administrator  
U. S. Nuclear Regulatory Commission, Region IV  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

NRC Senior Resident Inspector  
Arkansas Nuclear One  
P.O. Box 310  
London, AR 72847

U. S. Nuclear Regulatory Commission  
Attn: Mr. Stephen Koenick  
MS O8 B1A  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

**Attachment to**

**OCAN051606**

**List of Regulatory Commitments**

### List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE  (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
Complete bypass re-testing and incorporate results into Arkansas Nuclear One (ANO) calculations.	X		December 15, 2017
Complete the necessary insulation replacements, remediation, or model refinements.	X		1R28 Fall 2019 2R27 Spring 2020
Within six months of establishing a final determination of the scope of insulation replacement or remediation, or model refinements, Entergy will submit a final updated supplemental response to support closure of Generic Letter 2004-02 for ANO-1 and ANO-2.	X		June 15, 2018 (expected date)