

## NRR-DRMAPEm Resource

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**From:** Wengert, Thomas  
**Sent:** Tuesday, August 6, 2019 12:39 PM  
**To:** Arnold, Timothy  
**Cc:** BICE, DAVID B (ANO); Pascarelli, Robert  
**Subject:** Arkansas Nuclear One, Unit 2 - Acceptance Review of Request to Use Alternative System Leakage Testing for Extended RCS Pressure Boundary Piping, ANO2-PT-002 (EPID L-2019-LLR-0073)

By letter dated July 25, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19206A779), Entergy Operations, Inc. (the licensee) submitted an alternative request (ANO2-PT-002) for Arkansas Nuclear One, Unit 2 (ANO-2). The licensee has requested approval for an alternative to the requirements of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, IWB-5222(b) for system leakage testing at ANO-2. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this relief/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 50.55a(a)(z)(1) and 50.55a(a)(z)(2) of Title 10 of the *Code of Federal Regulations*, 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 in approximately 7 months, which is March 2020. 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



**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 160

**Mail Envelope Properties** (CY4PR09MB115737DCC9C7375B136196D58FD50)

**Subject:** Arkansas Nuclear One, Unit 2 - Acceptance Review of Request to Use  
Alternative System Leakage Testing for Extended RCS Pressure Boundary Piping, ANO2-PT-002 (EPID  
L-2019-LLR-0073)

**Sent Date:** 8/6/2019 12:38:30 PM

**Received Date:** 8/6/2019 12:38:00 PM

**From:** Wengert, Thomas

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

**Recipients:**

"BICE, DAVID B (ANO)" <DBICE@entergy.com>

Tracking Status: None

"Pascarelli, Robert" <Robert.Pascarelli@nrc.gov>

Tracking Status: None

"Arnold, Timothy" <TARNOLD@entergy.com>

Tracking Status: None

**Post Office:** CY4PR09MB1157.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3459	8/6/2019 12:38:00 PM

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**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**