

NRR-DRMAPEm Resource

From: Wengert, Thomas
Sent: Tuesday, October 1, 2019 7:51 AM
To: Arnold, Timothy
Cc: BICE, DAVID B (ANO); Pascarelli, Robert
Subject: ANO-2 - Acceptance Review of Alternative Requests PRR-ANO2-2019-1, PRR-ANO2-2019-2, SRR-ANO2-2019-1, and VRR-ANO2-2019-1 (EPIDs: L-2019-LLR-0085, -0086, -0087, and -0088)

Mr. Arnold,

By letter dated September 3, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19246B361), Entergy Operations, Inc. (the licensee) requested that, pursuant to Sections 50.55a(z)(1) and 50.55a(z)(2) of Title 10 of the *Code of Federal Regulations* (10 CFR), the Nuclear Regulatory Commission (NRC) authorize alternatives from certain inservice testing (IST) requirements of the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code during the fifth 10-year IST interval for Arkansas Nuclear One, Unit 2 (ANO-2). Specifically, the licensee submitted the following four alternative requests:

Alternatives requested pursuant to 10 CFR 50.55a(z)(1):

- PRR-ANO2-2019-1, concerning Low Pressure Safety Injection Pumps 2P-60A and 2P-60B
- PRR-ANO2-2019-2, concerning Service Water Pumps 2P-4A, 2P-4B, and 2P-4C
- SRR-ANO2-2019-1, concerning Snubbers

Alternative requested pursuant to 10 CFR 50.55a(z)(2):

- VRR-ANO2-2019-1, concerning Service Water Valves 2CV-1541-1 and 2CV-1560-2

Pursuant to 10 CFR 50.55a(z)(1), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety. Pursuant to 10 CFR 50.55a(z)(2), the applicant shall demonstrate 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 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 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 80 hours for each request, totaling 320 hours for the four requests. The NRC staff expects to complete this review in approximately 12 months, which is October 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.

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

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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>

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