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Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
NRC Special Design Basis Inspection Initiative

Gentlemen:

On October 23, 1996, Arkansas Nuclear One (ANO) was notified that a Design Basis Inspection has been scheduled for February of 1997. Considering ANO's schedule of operations and the likely impact of such an inspection on ANO's engineering resources, a decision was made to request a deferral of this inspection until late summer 1997. The request was discussed initially with Mr. Elmo Collins on October 31, 1996, and subsequently with Mr. Elmo Collins and Mr. Ken Brockman on November 1, 1996. Engineering resources at ANO are currently involved in a number of ongoing and planned activities which collectively make accommodation of any other major activity at the present time, particularly between two outages, very difficult. The purpose of this letter is to describe some of the reasoning that resulted in our decision to request deferral of the intended Design Basis Inspection effort.

Every three years at a two unit site on eighteen month cycles, two outages occur within three to five months of each other - one in the Fall and the other in the Spring of the following year. The peak holiday period of the year also occurs between the two outages. ANO is in such a period now. The Unit 1 refueling outage (1R13) was just completed in October and the Unit 2 refueling outage (2R12) begins in April of 1997. Whenever this occurs, the demand on engineering resources to support both outages is substantial. It is not feasible to maintain adequate resources to unitize the design engineering effort, so much of ANO's engineering resources move from the Fall outage directly into preparation for the Spring outage. For the upcoming Unit 2 outage, a significant amount of engineering work remains for the approximately 60 modifications scheduled to be implemented during 2R12. Some of the critical modifications include: the digital feedwater control system upgrade, vital inverter replacements, motor-operated valve modifications, control room emergency chiller

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replacements (an impact to both units), and waste gas system upgrades. As can be seen from the above examples, some of these modifications are involved and require dedicated attention to complete successfully. Part of our objectives at ANO involves learning from our past mistakes. In that regard, we have been providing more engineering involvement in modifications from "beginning to end" by having the same engineers who design a modification also involved in installing the modification. Working in this manner involves a team approach to modifying the plant. While this team approach has already had apparent benefits in improving modification quality and reducing errors in the field, it also requires the dedication of more engineering resources to a given modification. For our current situation, this means the engineers in 2R12 would just be going to the field for preliminary work associated with their respective modifications about the time the planned inspection effort is scheduled to begin. From that point forward, it appears, from what we know about the planned inspection, that there would be three to four weeks of site involvement with the Design Basis Inspection team. Conducting a major inspection activity during this time period would cause a significant burden on our engineering resources, given that the plans and schedules for this compressed work period have been made for some time and efforts are already well underway to accomplish those plans.

In addition to the above, there are several other improvement projects underway at ANO that place significant demands on engineering resources. Examples include: Independent Spent Fuel Storage Installation (ISFSI) support - the efforts in this area are well documented and we are entering a key phase of this process; Unit 2 steam generator tube plugging related work (i.e., alternate repair criteria) and safety analysis to support 2R12 - the critical nature of this work is apparent; Unit 2 steam generator replacement - recent approval of this project is the beginning of a major five year effort; Unit 1 main transformer replacement and Unit 1 main condenser replacement - initiatives that address aging of key plant components and also represent substantial engineering work; and zebra mussel infestation control modifications - a recently emerging problem that arrived earlier than expected and requires a concerted effort to get and stay ahead of problems associated with this new method of biofouling. All of these must continue to progress during the period between Unit 1 and Unit 2 outages and thus constitute additional workload for that timeframe.

Beyond the outage work items and hardware related improvements delineated above, ANO has obligated its engineering resources to improvement in several programmatic areas. ANO is committed to convert to Revised Standard Technical Specifications for both units and is actively involved in the conversion of the Unit 1 Technical Specifications at this time. This conversion demands a significant amount of engineering resources for technical reviews of the Technical Specification revisions and researching the basis for many of the numerical values in the Technical Specifications. The period between outages and the progress that can be made during that timeframe are crucial to making our planned submittal date. Further, there are currently two major site initiatives planned which will have a substantial impact on engineering resources. The first initiative involves the recent internal assessment of the ANO Safety Analysis Report (SAR). As a follow-up to the assessment results, a comprehensive review of the Unit 1 and Unit 2 SARs is currently planned. More details about this will be presented to NRC in a meeting scheduled for November 14, 1996. The second planned initiative is the

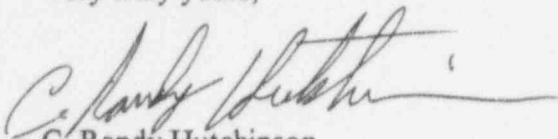
Entergy Operations, Inc. (EOI) Design Basis Assessment of all EOI plants. These assessments, scheduled to begin in December of 1996, will be performed at ANO in January of 1997 and will be a major resource impact to engineering. An upgrade of the Unit 1 inservice inspection/inservice testing program is also underway. This is a periodic work item that requires considerable engineering attention.

Finally, as we take a more self-critical look at ourselves, it has been our experience in recent years to identify work items late in the operating cycle that require corrective action in the next outage. ANO has recently identified two such emergent issues for 2R12. Some provisions to respond to issues as these, the recent 10CFR50.54(f) letter, and other similar issues must be allowed in the allocation of engineering resources.

Since April 1996, excluding resident inspection time, engineering inspections and team inspections having a substantial impact on engineering have totaled approximately 960 hours. The results of these inspections were positive, culminating in an improved SALP rating to 1 in the engineering area and the Integrated Performance Assessment Process (IPAP) inspection recommendation for reduced inspection hours in all engineering areas.

Based upon these ongoing and planned initiatives in the area of engineering, the recent superior level of performance in engineering as evidenced by the recent inspection activity and SALP rating, and in consideration of ANO's schedule of operation, ANO requests the NRC re-evaluate the plans for a Design Basis Inspection beginning February 1997. ANO requests deferral of the inspection until the 3rd quarter of 1997 in order to avoid unnecessary impacts to the inspection team and ANO personnel. This deferral would provide the full nine months advance notification allowed by Inspection Manual Chapter 0300 guidelines for this major inspection activity. If you have any questions regarding this request, please feel free to contact Mr. Dwight Mims at 501-858-4601.

Very truly yours,



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CRH/slp

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