

From: Wengert, Thomas
Sent: Thursday, July 2, 2020 9:06 AM
To: Keele Jr, Riley D
Cc: Clark, Robert; BICE, DAVID B (ANO); Dixon-Herrity, Jennifer; Lee, Samson
Subject: Arkansas Nuclear One, Units 1 and 2 - Acceptance Review of Relief Request No. EN-20-RR-001 (EPID L-2020-LLR-0076)

By letter May 27, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20148M343), Entergy Operations, Inc. (the licensee) submitted a relief request (EN-20-RR-001) to use the alternative requirements of ASME Code Case N-752, "Risk-informed Categorization and Treatment for Repair and Treatment for Repair/Replacement Activities in Class 2 and Class 3 Systems, Section XI, Division 1," for determining the risk-informed categorization and for implementing alternative treatment for repair/replacement activities on moderate and high energy Class 2 and 3 items at Arkansas Nuclear One, Units 1 and 2.

The purpose of this letter is to provide the results of the NRC staff's acceptance review of this relief 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* (10 CFR), the applicant shall demonstrate that the proposed alternatives 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 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 the jobhour expenditures to total approximately 375 hours. The NRC staff expects to complete this review by your requested date of June 27, 2021. 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

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"Clark, Robert" <RCLARK@entergy.com>
Tracking Status: None
"BICE, DAVID B (ANO)" <DBICE@entergy.com>
Tracking Status: None
"Dixon-Herrity, Jennifer" <Jennifer.Dixon-Herrity@nrc.gov>
Tracking Status: None
"Lee, Samson" <Samson.Lee@nrc.gov>
Tracking Status: None
"Keele Jr, Riley D" <rkeele@entergy.com>
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