UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
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ARLINGTON, TEXAS 76011-4005

April 13, 2005

Jeffrey S. Forbes
Vice President Operations
Arkansas Nuclear One
Entergy Operations, Inc.
1448 S.R. 333
Russellville, AR 72801-0967

SUBJECT: ARKANSAS NUCLEAR ONE, UNIT 2 - NRC LICENSE RENEWAL OPEN ITEMS INSPECTION REPORT 05000313/2005-012; 05000368/2005-012

Dear Mr. Forbes:

On February 17, 2005, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Arkansas Nuclear One, Unit 2 facility. The enclosed report documents the inspection conclusions, which were discussed in a formal pubic exit with Mr. Dale James, Acting Director, Nuclear Safety Assurance, and other members of your management and staff on February 17, 2005.

During the NRC staff's review of your license renewal application and the two previous license renewal inspections (scoping and screening inspection performed in March of 2004 and aging management review inspection performed in November of 2004), several items were identified that required further NRC review and/or inspection. This inspection was performed to review your resolution on these open items. During this inspection, we examined activities that support your application for a renewed license for the Arkansas Nuclear One, Unit 2 facility. Inspectors reviewed procedures and representative records, and visually examined portions of the plant. In addition, inspectors interviewed site personnel cognizant of your process for determining the systems, structures, and components requiring an aging management program as required by 10 CFR Part 54.

Based on the results of this inspection, the inspectors closed all of the open items. In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

//RA//

Linda J. Smith, Chief,
Plant Engineering Branch
Division of Reactor Safety

Docket: 50-368
License: NPF-6

Enclosure:
Inspection Report 05000/2004012
w/Attachment

cc w/enclosure:
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Only inspection reports to the following:
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SISP Review Completed: Yes ADAMS: Yes Initials: __ljs____
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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket(s):	50-368
License(s):	NPF-6
Report No.:	05000368/2005012
Licensee:	Entergy Operations, Inc.
Facility:	Arkansas Nuclear One, Unit 2
Location:	Junction of Hwy. 64W and Hwy. 333 South Russellville, Arkansas
Dates:	February 16, 2005 - March 31, 2005
Inspector:	R. L. Nease, Senior Reactor Inspector, Plant Engineering Branch
Accompanying Personnel:	G. Suber, Project Manager, Office of Nuclear Reactor Regulation
Approved By:	Linda J. Smith, Chief Plant Engineering Branch

SUMMARY OF FINDINGS

IR 05000368/2005012; 05000313/2005012; 02/16/2005 -02/17/2005, Entergy Operations, Inc., Arkansas Nuclear One, Unit 2. License Renewal Inspection Program, Open Items Inspection.

This license renewal open items closure inspection was performed by one NRC Region IV inspector and one staff member from the NRC's Office of Nuclear Reactor Regulation. The onsite portion of the inspection was conducted on February 16 and 17, 2005. Review of additional information provided by the applicant was performed on March 31, 2005, for confirmatory purposes only. This inspection does not apply to Unit 1. The inspectors used NRC Manual Chapter 2516 and NRC Inspection Procedure 71002 as guidance for performing this inspection. No “findings” as defined in NRC Manual Chapter 0612 were identified.

The purpose of this inspection was to reach resolution on issues identified during previous inspections and during the NRC staff’s review of the applicant’s license renewal application. These open items were identified in the NRC Aging Management Inspection Report 05000368/2004007, dated January 29, 2005. To do this, the inspectors reviewed the applicant’s methodology for identifying systems structures and components in the scope of license renewal, and their programs for managing the effects of aging on those systems, structures, and components, The inspectors concluded that the applicant adequately addressed all open items; therefore all open items are closed.

REPORT DETAILS

I. Inspection Scope

By letter dated October 14, 2003, Entergy Operations, Incorporated (the applicant) submitted to the NRC an application to renew the operating license for Arkansas Nuclear One, Unit 2 (ANO-2) to allow an additional 20 years of operation. In support of the NRC Office of Nuclear Reactor Regulation (NRR) technical review of the application, the NRC Region IV staff conducted three inspections at the plant site in Russellville, Arkansas, using the guidance in NRC Inspection Procedure 71002. The first inspection was a review of the applicant's license renewal scoping and screening activities, and was conducted from March 1 to March 5, 2004. The purpose of that inspection was to verify (1) that the applicant had performed scoping and screening activities in accordance with their license renewal application and in accordance with the NRC staff's Draft Safety Evaluation Report (SER), Related to the License Renewal of the Arkansas Nuclear One, Unit 2, dated November 2004, and (2) that these activities resulted in the identification of systems, structures, and components required to be considered for aging management. The NRC Region IV inspection team concluded that, in general, the applicant's scoping and screening process was successful. The results of the scoping and screening inspection were presented in NRC Inspection Report 05000368/2004-006, dated April 19, 2004, which is available electronically for public inspection in the NRC Public Document Room or from the Publically Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

The second inspection, was conducted by a team of NRC Region II and Region IV inspectors and a member of the NRR staff. The purpose of that inspection was to verify (1) that the applicant had identified the aging effects for those systems, structures, and components determined to be within the scope of license renewal, and (2) that appropriate measures were taken or will be taken to manage those aging effects such that intended functions of the selected systems, structures, and commodity groups are maintained throughout the period of extended operation. Open items were identified in this inspection. The results of the aging management review inspection were presented in NRC Inspection Report 05000368/2004-007, dated January 29, 2005, which is available electronically for public inspection in the NRC Public Document Room or from the Publically Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

The third inspection, which is the subject of this inspection report, was conducted by an NRC Region IV inspector and a member of the NRR staff. The purpose of this inspection was to close open items identified in the previous two inspections, as well as any items identified by the NRC staff in their review. During this inspection, the inspectors interviewed knowledgeable personnel, performed walkdowns of portions of the site, and reviewed the applicant's documents.

The Attachment to this report lists the applicant personnel contacted and the documents reviewed during this inspection.

II. Inspection Results

A. Electrical Manholes (Inaccessible Medium-Voltage Cables)

Description of Open Item: During a walkdown of the electrical manholes for the medium-voltage inaccessible cables, the aging management inspection team observed that the manholes were flooded such that the cables were submerged. The applicant credited NUREG 1801, "Generic Aging Lessons Learned," Section XI.E3 for managing the aging of in-scope medium-voltage inaccessible cables. The applicant's program included a periodic inspection of the manholes and removal of water, in accordance with NUREG-1801. However, when the cables have been exposed to significant moisture, NUREG-1801 recommends that the cables be tested. Since the manholes had been flooded for an indeterminate period of time, the inspection team referred this matter to the NRR staff for guidance. At issue was whether the Non-EQ Inaccessible Medium Voltage Cable Aging Management Program as proposed by the applicant in their License Renewal Application, Arkansas Nuclear One - Unit 2, dated October 14, 2003 (LRA) would be sufficient to manage the aging of these cables during the period of extended operation.

Basis for Resolution of Open Item: The NRR staff recommended a combination of tests and inspections to address the potential aging issues associated with submerged cables contained in flooded manholes. Specifically, the staff recommended that, in addition to performing the inspections described in the Non-EQ Inaccessible Medium Voltage Cable Aging Management Program, the applicant commit to testing the cables exposed to significant moisture at the test frequency recommended by NUREG-1801, Section XI.E3.

The applicant agreed to enhance the Non-EQ Inaccessible Medium Voltage Cable Aging Management Program by committing to test all cables exposed to significant moisture as recommended by NUREG-1801, XI.E3. Based on this commitment, documented in a letter to the NRC dated February 28, 2005, the inspectors concluded that aging effects on medium voltage cables exposed to significant moisture will be properly managed. This open item is closed.

B. Instrumentation Cables not Subject to Requirements of 10 CFR 50.49

Description of Open Item: The applicant credits their equipment qualification (EQ) program for managing the aging of cables outside containment that are associated with a component subject to the requirements of 10 CFR 50.49, "Environmental qualification of electric equipment important to safety for nuclear power plants." However, some of these cables themselves are not subject to 10 CFR 50.49. In the aging management review inspection, the inspection team questioned whether the effects of aging of cables outside containment that are associated with instrumentation and radiation monitors will be properly managed by the EQ program. At issue was whether the applicant's EQ

program included consideration of loss of insulation resistance which could cause these instruments to read in error.

Basis for Resolution of Open Item: The inspectors reviewed portions of two EQ cable test reports: (1) "Report on Qualification Tests for Rockbestos Adverse Service Coaxial, Twinaxial, and Triaxial Cable Generic Nuclear Incident for Class 1E Service in Nuclear Generating Stations," dated March 12, 1986" (cables for high range monitors); and (2) "Gamma-Metrics RCS Series Neutron Flux Monitoring System Qualification Test Report," dated April 1983 (cables for neutron flux instruments). Each of these tests included acceptance criteria for insulation resistance. In addition, the applicant used the results of these tests to perform accuracy calculations to verify that the component associated with these cables would be able to accurately perform its function under accident conditions. The applicant's EQ program includes a qualified life under bounding service conditions. For a cable whose service life is nearing expiration, the applicant's EQ program would require them to either re-analyze the cable's service life based on more realistic conditions, retest existing cable for extended the service life, or replace the cable.

The inspectors, in consultation with NRR staff, concluded that the applicant's EQ program would adequately manage the effects of aging in neutron monitoring and nuclear instrumentation cables outside containment. This open item is closed.

C. Water Chemistry Program

Description of Open Item: The applicant's water chemistry program is an existing program that was credited for managing corrosion in certain systems containing water by monitoring and correcting certain chemical parameters in the water systems. The program includes sampling and analyzing fluids, limiting the levels of certain impurities, and using chemical additives to preclude corrosive environments. The program requires that chemicals be added immediately when sampling identifies parameters outside allowable limits. The aging management inspection team identified that this program would not ensure that a passive protective oxide layer necessary for managing corrosion in these systems would be maintained if chemical parameters were outside allowable limits. Once lost, the addition of chemicals to bring the system back within parameters would not ensure that the passive protective oxide layer would be reestablished. The applicant agreed to address this as a formal, docketed commitment.

Basis for Resolution of Open Item: The inspectors reviewed the applicant's letter of December 9, 2004, which included a commitment to revise the water chemistry procedure and engineering report to address the potential loss of the passive protective oxide layer if chemistry limits are out of specification for an extended period.

With the addition of this commitment, the inspectors concluded that the water chemistry program would manage corrosion as described in the LRA. This open item is closed.

D. System Walkdown Program

Description of Open Item: The System Walkdown Program credits periodic system engineering walkdowns for managing the effects of aging on certain systems, structures, and components within the scope of license renewal, including fire protection. The aging management review inspection team found that the program is currently implemented via a desk top guide, not a formal, controlled procedure. As such, the program is not implemented consistently across the systems for which it was designated. For example, the program lists fire protection as one of the systems whose aging effects would be managed by the system walkdown program; however, walkdowns are not currently being performed for the fire protection system. Furthermore, during the aging management review inspection (November of 2004), the applicant revised the desktop guide to remove the requirement for system walkdowns to be performed every refueling cycle. The aging management inspection team also identified that the results of system walkdowns that were being conducted were not documented in accordance with the desktop guide, and therefore were not auditable.

Basis for Resolution of Open Item: The System Walkdown Program is an existing program identified in the LRA as needing enhancement prior to the extended period of operation. The applicant stated in the LRA that the system walkdown program includes inspections of external surfaces of components determined to be within the scope of license renewal. Because fire protection is in the scope of license renewal, the system walkdown program will include fire protection systems and components. Per the LRA, these inspections will be performed at least every refueling outage, and deficiencies will be corrected as necessary, and documented so that results can be trended. Therefore, prior to the extended period of operation, the system walkdown program will be revised to include walkdowns of systems and components in the scope of license renewal (including fire protection system) performed every refueling cycle, and a requirement to document walkdown results. Furthermore, the applicant agreed that the informal desk guide will be upgraded to a formal, controlled procedure. The inspectors verified that this commitment was included in the applicant's commitment tracking database.

Based on the above, the inspectors concluded that the applicant's system walkdown program will adequately manage the effects of aging for which it is credited in the LRA. This open item is closed.

E. Fire Protection Replacement Parts Stored in the Warehouse

Description of the Open Item: The aging management inspection team identified that the applicant had not included in the scope of license renewal, staged valve replacement components that would be installed for achieving and maintaining cold shutdown conditions, as required by 10 CFR Part 50, Appendix R. These valve components, when installed in low pressure safety injection (LPSI) Valve 2CV-5017-1 in the LPSI system, are considered to be moving parts, therefore not subject to an aging management review. However, when staged in the warehouse for 10 CFR Appendix R purposes, these replacement components could be considered to be performing a license renewal function without moving parts or a change in configuration. As such,

these valve replacement components would be subject to an aging management review. The applicant did not perform such a review. At issue was whether these staged LPSI valve replacement components should have been identified as being in the scope of license renewal and subject to an aging management review in accordance with 10 CFR 54.21(a)(1)(I).

Basis for Resolution of Open Item: In order to reach cold shutdown conditions in accordance with 10 CFR Part 50, Appendix R, the applicant credits timely replacement of the stem clamp key, stem clamp, and set screw in LPSI Valve 2CV-5017-1, which could be damaged due to fire-induced spurious maloperation. The applicant staged these valve components in a warehouse that is credited for meeting 10 CFR Part 50, Appendix B, Criterion XIII, "Handling, Storage, and Shipping." In addition, these valve components are tagged for Appendix R use to ensure they will be available when needed. The inspectors observed these components in the warehouse and noted that the set screw was composed of stainless steel, and the stem clamp key and stem clamp were composed of carbon steel. The inspectors observed that the stem clamp had a very thin layer of rust on some of its machined surfaces, but not enough to prevent its installation in the LPSI valve.

The applicant determined that LPSI Valve 2CV-5017-1 was in the scope of license renewal, because it is a safety-related component in accordance with 10 CFR 54.4(a)(1). However, the applicant did not identify these valve components as requiring an aging management review, because when installed in the plant they do not serve a function without moving parts or a change in configuration as described in 10 CFR 54.21(a)(1)(i). The inspectors agreed that this LPSI valve should be in the scope of license renewal as it is safety-related as required in 10 CFR 54.4(a)(1). The inspectors also agreed that when installed in the plant the LPSI Valve 2CV-5017-1 stem clamp key, stem clamp, and set screw do not require an aging management review in accordance with 10 CFR 54.21(a)(1)(i). However, the inspectors determined that this valve should also be in the scope of license renewal, because it is relied on for meeting 10 CFR Part 50, Appendix R, as required in 10 CFR 54.4(a)(3). The inspectors found that these valve components serve a function to be ready for installation in the event that LPSI Valve 2CV-5017-1 is damaged during a 10 CFR Part 50, Appendix R fire event. When stored in the warehouse, this function is performed without moving parts or a change in configuration; therefore, these stored LPSI valve components are subject to an aging management review in accordance with 10 CFR 54.21(a)(1)(i).

The applicant agreed that the LPSI Valve 2CV-5017-1 stem clamp key, stem clamp, and set screw were in the scope of license renewal in accordance with 10 CFR 54.4(a)(3), and performed an aging management review. This review is documented in Engineering Report 02-R-2005-02, "ANO-2 License Renewal Project Aging Management Review of the Emergency Core Cooling System," dated March 30, 2005. The applicant evaluated the potential aging effects, and concluded that these effects would be managed when stored in accordance with 10 CFR Part 50, Appendix B, Criterion XIII storage requirements. Criterion XIII of 10 CFR Part 50, Appendix B requires that measures be established to control the storage of safety-related equipment to prevent damage or deterioration. The inspectors agreed that these measures would

manage aging effects of the LPSI Valve 2CV-5017-1 stem clamp key, stem clamp, and set screw. This open item is closed.

F. Alternate AC Diesel Generator Starting Air Tank

Description of Open Item: During the aging management inspection, an open item was identified concerning the applicant's aging management program for the alternate AC diesel generator starting air system. The aging management program did not include an inspection of the carbon steel air start tank, because the applicant did not believe the conditions for the aging to occur would exist in the system, as long as the dryers were maintained. During system walkdowns, the team found evidence of carbon steel corrosion products on the drain line to the air start tank, indicating that the conditions for aging effects of carbon steel had existed in the system. The applicant agreed to inspect the internals of the alternate AC diesel generator air start tank as part of their aging management program, and agreed to docket such a commitment.

Basis for Resolution of Open Item: The inspectors reviewed the applicant's letter of December 9, 2004, which included a commitment to revise the Periodic Surveillance and Preventive Maintenance Program to include a periodic inspection of the alternate AC diesel generator starting air tank.

With the addition of this commitment, the inspectors concluded that the Periodic Surveillance and Preventive Maintenance Program will manage the effects of aging as described in the LRA. This open item is closed.

G. ANO-2 License Renewal Boundary Revision

Description of Open Item: The aging management inspection team reviewed the applicant's methodology for determining the systems, structures, and components that are in the scope of license renewal, as revised by the response to the NRC's request for additional information RAI 2.1-4, dated May 19, 2004. The aging management inspection team reviewed the revised boundary drawings and verified that the boundaries were consistent with the revised methodology. The inspection team noted that the new methodology resulted in an increase in components included in the scope of license renewal, and requested that the applicant identify any components that were not previously identified to the NRR staff. Of concern was that these additional components could introduce new aging effects as a result of new material/environment combinations.

Basis for Resolution of Open Item: The applicant provided the inspectors with a table entitled, "New LRA Line Items for 10CFR54.4(a)(2) Connected Piping," which listed the additional components in the scope of license renewal, as well as their material/environmental combinations and the aging affects associated with those material/environmental combinations. On a sampling basis, the inspectors verified that the additional components were included on the license renewal boundary drawings. In addition the inspectors verified that the additional components listed in the table did not

introduce any new aging effects as a result of material/environment combinations not previously reviewed.

The inspectors verified that the applicant formally submitted the "NEW LRA Line Items for 10CFR54.4(a)(2) Connected Piping" with the newly identified components to NRR by letter dated February 28, 2005. Based on the above, the inspectors concluded that using their revised methodology, the applicant appropriately identified components in the scope of license renewal which are subject to an aging management program. This open item is, therefore, closed

III. Exit Meeting Summary

On February 17, 2005, the lead inspector presented the inspection results to Mr. Dale James and other members of applicant's management and staff in a public meeting. The inspectors confirmed that proprietary information was not provided or examined during the inspection. The applicant acknowledged the inspectors conclusions and voiced no dissenting comments.

ATTACHMENT

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Applicant

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K. Gaston, Mechanical Engineer, ANO Unit 2 License Renewal
D. Hughes, Materials Supervisor
N. Mosher, Licensing Engineer
R. Puckett, Supervisor, Engineering Programs
R. Rucker, Electrical Lead Engineer, ANO Unit 2 License Renewal
M. Stroud, Project Manager, ANO Unit 2 License Renewal
G. Young, Group Manager, ANO Unit 2 License Renewal

NRC

S. Lee, Section Chief, Office of Nuclear Reactor Regulation (NRR)
S. Weerakody, Section Chief, NRR
R. Dipert, Fire Protection Specialist, NRR
E. Crowe, NRC Resident Inspector

LIST OF DOCUMENTS REVIEWED

The following documents were selected and portions therein reviewed by the inspectors to accomplish the objectives and scope of the inspection.

Drawings

LRA-2241, Sht. 3, "AAC Generator System Fuel Oil Subsystem P&ID," Rev. 0
LRA- M -207, Sht. 1, "Condensate Demineralizer P&ID," Rev. 0
LRA- M -217, Sht. 1, "Emergency Diesel Generator Fuel Oil Storage P&ID," Rev. 0
LRA- M -2204, Sht. 4, "Emergency Feedwater P&ID," Rev. 0
LRA- M - 2204, Sht. 5, "Emergency Feedwater Storage P&ID," Rev. 0
LRA-M-2261, Sht. 2, "Hydrogen Purge Air System P&ID," Rev. 0
LRA-M -2202, Sht. 1, "Main Steam P&ID," Rev. 51
LRA-M-2206, Sht. 1, "Steam Generator Secondary System P&ID," Rev. 0
LRA-M-2210, Sht. 1, "Service Water System P&ID," Rev. 0

Miscellaneous Documents

Condition Report CR-ANO-C-2004-00459

Engineering Report 02-R-2005-02, "ANO-2 License Renewal Project Aging Management Review of the Emergency Core Cooling System," dated March 30, 2005

Gamma-Metrics RCS Series Neutron Flux Monitoring System Qualification Test Report, dated April 1983

License Renewal Application, Arkansas Nuclear One - Unit 2, dated October 14, 2003

Letter to U.S. Nuclear Regulatory Commission from Dale M. James, dated February 28, 2005

Letter to U.S. Nuclear Regulatory Commission from Dale M. James, dated December 9, 2004

New LRA Line Items for 10CFR54.4(a)(2) Connected Piping Table

NUREG 1801, "Generic Aging Lessons Learned"

Report on Qualification Tests for Rockbestos Adverse Service Coaxial, Twinaxial, and Triaxial Cable Generic Nuclear Incident for Class 1E Service in Nuclear Generating Stations, dated March 12, 1986

Safety Evaluation Report Related to the License Renewal of the Arkansas Nuclear One, Unit 2, dated November 2004