

Mr. Craig G. Anderson
Vice President, Operations ANO
Entergy Operations, Inc.
1448 S. R. 333
Russellville, AR 72801

March 7, 2000

SUBJECT: ARKANSAS NUCLEAR ONE, UNIT 1 RE: 10 CFR 50 APPENDIX R
EXEMPTION CLARIFICATION FOR THE MAKE-UP PUMP ROOMS
(TAC NO. MA1546)

Dear Mr. Anderson:

By letter dated July 1, 1982 (0CAN078202), as supplemented and amended by letter dated November 11, 1982 (0CAN118210), Arkansas Power & Light Company requested an exemption from the requirements of 10 CFR 50, Appendix R, Sections III.G.2 and III.G.3, for various fire zones for Arkansas Nuclear One, Unit 1 (ANO-1). By letter dated March 22, 1983, the Nuclear Regulatory Commission (NRC) issued an exemption granting this request, along with a supporting safety evaluation. As part of this exemption, the make-up pump rooms were exempted from the requirements of 10 CFR 50, Appendix R, Section III.G.2, to the extent it requires an automatic fire suppression system. The NRC staff concluded that the existing design features and physical barriers associated with the makeup pump room and the adjacent corridor area, in conjunction with your proposal to add one-hour barriers to selected cable trays and conduits, would mitigate the onset of cable damage for a sufficient time-period to enable the fire brigade to respond to extinguish the fire prior to damage to both trains. Therefore, the NRC staff determined that the level of protection provided was adequate and equivalent to that required in 10 CFR 50, Appendix R, Section III.G, and granted the requested exemption.

In a letter dated October 22, 1997 (1CAN109704), Entergy Operations, Inc. described various deviations between actual plant conditions and that described in the submittals dated July 1 and November 11, 1982, regarding the design features and physical barriers associated with the make-up pump rooms and the adjacent corridor area. These deviations included an addition to the safe shutdown equipment located in each make-up room, an increase to the combustible loading in the make-up rooms, a reduction in commitment for the application of the one-hour barrier, and a removal of the physical barrier limiting access to this room. You provided this letter to bring these deviations to the attention of the NRC staff as a clarification to the application for the original exemption.

The NRC staff has completed its review of the your clarification letter dated October 22, 1997, and determined that the deviations discussed in this letter represent material changes to the information upon which the staff based its safety finding, as detailed in the exemption and associated safety evaluation. As a result, the NRC staff has determined that a clarification letter is not an appropriate means through which these deviations can be dispositioned. The existence of these deviations constitutes a nonconforming condition that places ANO-1 outside of its existing licensing bases. Therefore, the staff has determined that you have three available options to correct this condition: 1) fully comply with the requirements of 10 CFR 50, Appendix R, Section III.G.2, for the make-up pump rooms through the addition of an automatic

fire suppression system, 2) restore the plant configuration such that it is consistent with that described in the original submittals dated July 1 and November 11, 1982, or 3) submit a revised exemption request based on actual plant conditions. In addition, the NRC staff refers you to the guidance provided in Generic Letter 91-18, Revision 1, "Information to Licensees Regarding NRC Inspection Manual Section on Resolution of Degraded and Nonconforming Conditions," when evaluating the safety implications of this interim condition and determining the appropriate corrective or compensatory actions to be taken while you pursue a final resolution.

Sincerely,

/RA/

M. Christopher Nolan, Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-313

cc: See next page

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Russell, J. (1995). *Journal of Business Ethics*, 14(1), 1-10.

Jackson, S. (1995). *Business Ethics Quarterly*, 5(1), 1-10.