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0CAN121101

December 14, 2011

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

SUBJECT: Request for Additional Information for the 60-Day Response
to NRC Bulletin 2011-01, Mitigating Strategies
Arkansas Nuclear One – Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6

References: 1. NRC letter to Entergy, *Request for Additional Information Regarding 60-Day Response to NRC Bulletin 2011-01, Mitigating Strategies*, dated November 18, 2011 (0CNA111102)
2. Entergy letter to NRC, *60-Day Response to NRC Bulletin 2011-01, Mitigating Strategies*, dated July 8, 2011 (0CAN071101)

Dear Sir or Madam:

By letter in Reference 1, the NRC issued a request for additional information (RAI) for the 60-day response to NRC Bulletin 2011-01 (Reference 2). The attachment to this submittal provides the RAI responses requested within 30 days.

There are no new commitments contained in this submittal. If you need any additional information, please contact Stephenie Pyle at 479.858.4704.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 14, 2011.

Sincerely,

Original signed by Dale James for C. J. Schwarz

CJS/nbm

Attachment: RAI for the 60-Day Response to NRC Bulletin 2011-01

cc: Mr. Elmo Collins
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U. S. Nuclear Regulatory Commission
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Attachment to

0CAN121101

**Request for Additional Information for the 60-Day
Response to NRC Bulletin 2011-01**

Request for Additional Information for the 60-Day Response to NRC Bulletin 2011-01

- 1. Please describe in detail the maintenance or testing of monitor nozzles, spray nozzles, or similar devices to ensure that they will be functional when needed.**

The bulletin requested that each licensee describe in detail the maintenance and testing on equipment procured to support the mitigating strategies to ensure that it will be functional when needed. In the context of the mitigating strategies, these devices are commonly used for firefighting, spent fuel pool spray strategies, and as a means to reduce the magnitude of fission product releases.

Response: Maintenance and testing is not currently performed on the monitor nozzles; however, an action to develop a preventative maintenance task has been initiated to include inspection and performance testing of the monitor nozzle in conjunction with the annual testing of the B.5.b portable pump.

- 2. Please describe in detail how you ensure that a vehicle is available to move the B.5.b portable pump and other B.5.b equipment to the appropriate place when needed.**

The bulletin requested that each licensee describe in detail the controls for ensuring equipment needed to execute the mitigating strategies will be available when needed. A vehicle is typically needed to implement the strategies since the portable pump and other equipment is stored away from target areas.

Response: An onsite procedure contains the instructions for ensuring available tow vehicles for the B.5.b portable pump and trailer. The procedure provides guidance for obtaining any one of nine onsite vehicles equipped with a two-inch receiver hitch. The preferred vehicles are located outside of the protected area with alternate vehicles located inside the protected area.

- 3. Please identify the minimum inventory frequency for equipment needed for the mitigating strategies not specifically identified in response to the bulletin. Alternatively, please describe the inventory frequency for firefighter turnout gear, tools, and instruments needed to support the mitigating strategies.**

The bulletin requested that each licensee describe in detail the controls for ensuring equipment supporting the mitigating strategies will be available when needed. The equipment listed above is generally needed to implement the mitigating strategies, but not all of these items were clearly included in the licensee's response dated July 8, 2011, to the bulletin.

Response: The minimum inventory frequency for equipment, tools, and instruments needed for the mitigating strategies was specifically identified in response to the third item of the 60-day response to the bulletin (Reference 2 in cover letter). In addition, the firefighter turnout gear located inside the protected area is inventoried quarterly while the firefighter turnout gear located outside the damage footprint is inventoried annually.

4. Please describe in detail the fire brigade training as it relates to all phases of the mitigating strategies.

The bulletin requested that each licensee describe in detail how configuration and guidance management, including training, is assured so that the strategies remain feasible. The safety evaluation documenting the NRC review of the licensee’s response to Section B.5.b of the Interim Compensatory Measures Order (EA-02-026) states that the expectation for fire brigade training (Phase 1, B.1.I) includes accelerant-fed fires and coordinated fire response. The licensee’s response to the bulletin implies that fire brigade training is limited to pump operations.

Response: The following information was provided in the table in the response to the fourth item of the 60-day response to the bulletin (Reference 2 in cover letter).

Station Personnel	Training	Periodicity	Evaluation
Operations	Initial training and continuing training on the pump operation (non-licensed operators) and procedure/mitigating strategies (licensed operators)	3 years	Classroom and in-plant training
Fire Brigade	Initial training and continuing training on pump operation both classroom and hands-on	3 years	Computer-based training acknowledgement (operation and evaluation of B.5.b pump staging and operation included biennially in fire brigade training)

The above table listed procedure/mitigating strategies training for licensed operators. As a clarification, non-licensed operators also receive this training.

The fire brigade for each Arkansas Nuclear One unit is comprised of five response members who are predominantly operations personnel (four operators and one security member).

Fire brigade training on flammable liquids and gases (Class B fires) addresses:

- Characteristics of Class B fires
- Creation and use of firefighting foams for controlling Class B fires
- How fire fighting foam is created and properly applied
- Construction, parts, and function of the foam system
- Proper application techniques for using foam to fight a Class B fire

In addition to the above, the fire brigade leader training addresses the fire fighting complications and strategies created by accelerants from aircraft crashes on site. The fire brigade leader training also addresses contacting the London Fire Department, establishing a unified command when the fire department arrives, and teaming the offsite firefighting personnel with fire brigade personnel.

Operations training on the mitigating strategies included in an onsite procedure addresses applicable concerns, causes, transient response, and transient mitigation methods.

Specifically, the training addresses operator actions required to implement the B.5.b mitigating strategies. The procedure also provides the following concerning incident command and control. Command and control of an incident at ANO requiring support from non-ANO resources operate under the National Incident Management System (NIMS) process. In events where large scale damage has occurred at the site, the NIMS process is adhered to. Command and control of firefighting efforts is retained by the onsite Fire Brigade Leader at the scene. The Fire Brigade Leader, in control of firefighting efforts onsite, is incorporated into the NIMS process as offsite response agencies respond to the site. In addition, the onsite Fire Brigade Leader interfaces with the London Fire Department who provides organizational coordination with the other responding mutual aid resources.