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OCAN051703

May 31, 2017

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
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SUBJECT: Mitigating Strategies Assessment for Flooding  
Arkansas Nuclear One – Units 1 and 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6

Dear Sir or Madam:

On March 12, 2012, the NRC issued Reference 1 to request information associated with Near-Term Task Force (NTTF) Recommendation 2.1 for Flooding. One of the required responses in Reference 1 directed licensees to submit a Flood Hazard Reevaluation Report (FHRR). Entergy Operations, Inc. (Entergy) submitted the FHRR for Arkansas Nuclear One (ANO) on September 14, 2016 (Reference 2).

Concurrent with the flood hazard reevaluation, Entergy developed and implemented mitigating strategies in accordance with NRC Order EA-12-049, *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (BDBEEs)*. In Reference 3, the NRC affirmed that licensees need to address the reevaluated flooding hazards within their mitigating strategies for BDBEEs, including the reevaluated flood hazards. This requirement was confirmed by the NRC in Reference 4. Guidance for performing the Mitigating Strategies Assessment (MSA) for flooding is contained in Appendix G of Reference 5, endorsed by the NRC in Reference 6. For the purpose of the MSA for flooding and in Reference 4, the NRC termed the reevaluated flood hazard, summarized in Reference 7, as the Mitigating Strategies Flood Hazard Information (MSFHI). Reference 5, Appendix G, describes the MSA for flooding. In Reference 7, the NRC concluded that the "reevaluated flood hazards information, as summarized in the Enclosure, is suitable for the assessment of mitigating strategies developed in response to Order EA-12-049."

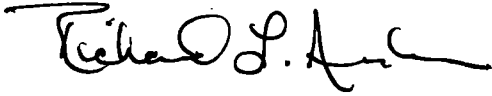
The enclosure to this letter provides the MSA for Flooding Report for ANO. The assessment concluded that the existing FLEX strategy can be successfully implemented and deployed as modified for flood causing mechanism local intense precipitation (LIP). Pre-deployment of the FLEX 480 VAC generator and support equipment or raising a section of the primary deployment path are alternatives for the LIP event. Section 2.3.2 of the enclosure describes a commitment to revise ANO's Natural Emergencies Procedures to address an LIP event.

This submittal contains a new regulatory commitment which is provided in the attachment to this letter. Should you have any questions concerning the content of this letter, please contact Stephenie Pyle at 479.858.4704.

ADID  
AISI  
NRR

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on May 31, 2017.

Sincerely,



RLA/nbm

Enclosure: 2017 Mitigating Strategy Assessment for Flooding Documentation Requirements  
at Arkansas Nuclear One

Attachment: List of Regulatory Commitments

REFERENCES:

1. NRC letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the NTTF Review of Insights from the Fukushima Dai-ichi Accident*, dated March 12, 2012 (OCNA031208) (ML12053A340)
2. Entergy letter to NRC, *Flooding Hazard Re-evaluation Report - Required Response for NTTF Recommendation 2.1, Arkansas Nuclear One Units 1 and 2 Flooding Hazard Re-Evaluation Report*, dated September 14, 2016 (OCAN091602) (ML16260A060)
3. NRC Memoranda, *Staff Requirements - COMSECY-14-0037, Integration of Mitigating Strategies for BDBEEs and the Reevaluation of Flooding Hazards*, dated March 30, 2015 (ML15089A236)
4. NRC Letter, *Coordination of Requests for Information Regarding Flooding Hazard Reevaluations and Mitigating Strategies for BDBEEs*, dated September 1, 2015 (OCNA091501) (ML15174A257)
5. Nuclear Energy Institute (NEI) Report NEI 12-06 [Rev 2], *Diverse and Flexible Coping Strategies (FLEX) Implementation Guide*, dated December 2015 (ML16005A625)
6. U.S. Nuclear Regulatory Commission, JLD-ISG-2012-01, Revision 1, *Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigating Strategies for BDBEEs*, dated January 22, 2016 (ML15357A163)
7. NRC Letter to Entergy, *Arkansas Nuclear One, Units 1 and 2 - Interim Staff Response to Reevaluated Flood Hazards Submitted in Response to 10 CFR 50.54(f) Information Request - Flood-Causing Mechanism Reevaluation (CAC Nos. MF8379 and MF8380)*, dated December 2, 2016 (OCNA121601) (ML16327A494)

cc: Mr. Kriss Kennedy  
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**Enclosure to**

**0CAN051703**

**2017 Mitigating Strategy Assessment for Flooding Documentation Requirements  
at Arkansas Nuclear One**