




**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

April 20, 2001

MEMORANDUM TO: File

FROM:  Thomas W. Alexion, Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management

SUBJECT: ARKANSAS NUCLEAR ONE, UNIT 2 RE: DISCUSSIONS REGARDING
PROPOSED REACTOR COOLANT LEAKAGE DETECTION SYSTEM
TECHNICAL SPECIFICATIONS (TAC NO. MB1182)

The U. S. Nuclear Regulatory Commission (NRC) staff has had discussions with Entergy Operations, Inc., the licensee, regarding the licensee's February 6, 2001, application on the above subject. In order to facilitate these discussions, the licensee provided the draft information in the attachment. This draft information may be revised if and when the licensee decides to supplement their application. This information was not used in rendering any regulatory decisions.

The purpose of this memorandum is to place the attachment in the Public Document Room.

Docket No. 50-368

Attachment: As stated



Entergy

ARKANSAS NUCLEAR ONE
1448 S.R. 333
Russellville, AR 72802

FAX COVERLETTER

DATE: April 19, 2001

TO: **Tom Alexion**
COMPANY or LOCATION: **U. S. Nuclear Regulatory Commission**
TELEPHONE NUMBER
FACSIMILE (FAX) NUMBER:
VERIFICATION NUMBER:

FROM: **David Bice**
TELEPHONE NUMBER:
LOCATION: **Arkansas Nuclear One Licensing Department**
OUR FAX NUMBER:
OUR VERIFICATION NUMBER
NUMBER OF PAGES INCLUDING COVER: **10**

COMMENTS:

For reference during next teleconference

REACTOR COOLANT SYSTEM3/4.4.6 REACTOR COOLANT SYSTEM LEAKAGELEAKAGE DETECTION SYSTEMSLIMITING CONDITION FOR OPERATION

3.4.6.1 The following Reactor Coolant System leakage detection systems shall be OPERABLE:

- a. The containment sump level monitor, and
- b. Two containment atmosphere radioactivity monitoring systems.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

-----NOTE-----

Separate Condition entry is allowed for each monitor or system.

- a. With one or more containment atmosphere radioactivity monitoring system inoperable, operation may continue for up to 30 days provided:
 1. grab samples of the containment atmosphere are obtained and analyzed at least once per 24 hours, or
 2. a Reactor Coolant System water inventory balance is performed once per 24 hours in accordance with Surveillance Requirement 4.4.6.2.1.a;*otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the containment sump level monitor inoperable, operation may continue for up to 30 days provided a Reactor Coolant System water inventory balance is performed at least once per 24 hours in accordance with Surveillance Requirement 4.4.6.2.1.a;* otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With the containment sump level monitor inoperable and one containment atmosphere radioactivity monitoring system inoperable, operation may continue for up to 30 days provided a Reactor Coolant System water inventory balance is performed at least once per 24 hours in accordance with Surveillance Requirement 4.4.6.2.1.a;* otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. The provisions of Specification 3.0.4 are not applicable.

*Not required until 12 hours after establishment of steady state conditions.

REACTOR COOLANT SYSTEM3/4.4.6 REACTOR COOLANT SYSTEM LEAKAGELEAKAGE DETECTION SYSTEMSSURVEILLANCE REQUIREMENTS

4.4.6.1 The leakage detection system shall be demonstrated OPERABLE by:

- a. Performing a CHANNEL CHECK of the required containment atmosphere radioactivity monitor at least once per 12 hours.
- b. Performing a CHANNEL CHECK of the containment sump level monitor at least once per 12 hours.
- c. Performing a CHANNEL FUNCTIONAL TEST of the required containment atmosphere radioactivity monitor at least once per 31 days.
- d. Performing a CHANNEL CALIBRATION of the containment sump level monitor at least once per 18 months.
- e. Performing a CHANNEL CALIBRATION of the required containment atmosphere radioactivity monitor at least once per 18 months.

REACTOR COOLANT SYSTEM

BASES

Wastage type defects are unlikely with proper chemistry treatment of the secondary coolant. However, even if a defect should develop in service, it will be found during scheduled inservice steam generator tubes examinations. Plugging will be required for all tubes with imperfections exceeding the plugging limit as defined in Surveillance Requirement 4.4.5.4.a. Steam generator tube inspections of operating plants have demonstrated the capability to reliably detect degradation that could affect tube wall integrity. Additionally, upgraded testing methods will be evaluated and appropriately implemented as better methods are developed and validated for commercial use.

Whenever the results of any steam generator tubing inservice inspection fall into Category C-3 certain results will be reported in a Special Report to the Commission pursuant to Specification 6.9.2 as denoted by Table 4.2-2. Notification of the Commission will be made prior to resumption of plant operation. Such cases will be considered by the Commission on a case-by-case basis and may result in a requirement for analysis, laboratory examinations, tests, additional eddy-current inspection, and revision of the Technical Specifications, if necessary.

3/4.4.6 REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.6.1 LEAKAGE DETECTION SYSTEMS

GDC 30 of Appendix A to 10 CFR 50 requires means for detecting and, to the extent practical, identifying the location of the source of RCS LEAKAGE. The RCS leakage detection systems required by this specification are provided to monitor and detect leakage from the Reactor Coolant Pressure Boundary. These detection systems are consistent with the recommendations of Regulatory Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems" May 1973. Likewise, the actions implemented upon inoperability of a required leak detection instrument are sufficient in maintaining the diversity and accuracy needed to effectively detect RCS leaks.

Industry practice has shown that water flow changes of 0.5 gpm to 1.0 gpm can readily be detected in contained volumes by monitoring changes in water level, in flow rate, or in the operating frequency of a pump. In addition, the reactor coolant contains radioactivity that, when released to the containment, can be detected by radiation monitoring instrumentation. Instrument sensitivities of $10 - 10^6$ cpm for particulate and gaseous monitoring are practical for these leakage detection systems.

A containment atmosphere radioactivity monitoring system consists of two detectors, gaseous and particulate, mounted on the same skid, powered from the same train power supply, and having a common suction and discharge to/from the containment building. A containment atmosphere radioactivity monitoring system is considered OPERABLE provided at least one of its two installed detectors, gaseous or particulate, is OPERABLE.

The Note allowing separate entry for each monitor or system ensures that a restoration period of up to 30 days may be utilized for each separate monitor or system. For example, if the containment sump level monitor were inoperable for 15 days when a containment atmosphere radioactivity monitoring system is rendered inoperable, the containment atmosphere radioactivity monitoring system must be restored to OPERABLE status within the next 30 days. Without this provision, only 15 days would be remaining to permit restoration of the containment atmosphere radioactivity monitoring system to OPERABLE status. Additionally, 12 hours is provided by footnote to allow for plant stabilization before performance of the required reactor coolant inventory balance. This provision is necessary to ensure an accurate measurement is obtained.

REACTOR COOLANT SYSTEMBASES3/4.4.6.2 REACTOR COOLANT SYSTEM LEAKAGE

Industry experience has shown that while a limited amount of leakage is expected from the RCS, the unidentified portion of this leakage can be reduced to a threshold value of less than 1 GPM. This threshold value is sufficiently low to ensure early detection of additional leakage.

The 10 GPM IDENTIFIED LEAKAGE limitation provides allowances for a limited amount of leakage from known sources whose presence will not interfere with the detection of UNIDENTIFIED LEAKAGE by the leakage detection systems.

The Surveillance Requirements for RCS Pressure Isolation Valves provide added assurance of valve integrity thereby reducing the probability of gross valve failure and consequent intersystem LOCA. Leakage from the RCS Pressure Isolation Valves is IDENTIFIED LEAKAGE and will be considered as a portion of the allowed limit.

The total steam generator tube leakage limit of 300 gallons per day for all steam generators ensures that the dosage contribution from the tube leakage will be limited to a small fraction of Part 100 limits in the event of either a steam generator tube rupture or steam line break. The 150 gallon per day leakage limit per steam generator ensures that steam generator tube integrity is maintained in the event of a main steam line rupture or under LOCA conditions.

PRESSURE BOUNDARY LEAKAGE of any magnitude is unacceptable since it may be indicative of an impending gross failure of the pressure boundary. Therefore, the presence of any PRESSURE BOUNDARY LEAKAGE requires the unit to be promptly placed in COLD SHUTDOWN.

3/4.4.7 CHEMISTRY

The limitations on Reactor Coolant System chemistry ensure that corrosion of the Reactor Coolant System is minimized and reduce the potential for Reactor Coolant System leakage or failure due to stress corrosion. Maintaining the chemistry within the Steady State Limits provides adequate corrosion protection to ensure the structural integrity of the Reactor Coolant System over the life of the plant. The associated effects of exceeding the oxygen, chloride and fluoride limits are time and temperature dependent. Corrosion studies show that operation may be continued with contaminant concentration levels in excess of the Steady State Limits, up to the Transient Limits, for the specified limited time intervals without having a significant effect on the structural integrity of the Reactor Coolant System. The time interval permitting continued operation within the restrictions of the Transient Limits provides time for taking corrective actions to restore the contaminant concentrations to within the Steady State Limits.

The surveillance requirements provide adequate assurance that concentrations in excess of the limits will be detected in sufficient time to take corrective action.

3/4.4.8 SPECIFIC ACTIVITY

The limitations on the specific activity of the primary coolant ensure that the resulting 2-hour doses at the site boundary will not exceed an appropriately small fraction of Part 100 limits following a

REACTOR COOLANT SYSTEM3/4.4.6 REACTOR COOLANT SYSTEM LEAKAGELEAKAGE DETECTION SYSTEMSLIMITING CONDITION FOR OPERATION

3.4.6.1 The following Reactor Coolant System leakage detection systems shall be OPERABLE:

- a. ~~A containment atmosphere particulate radioactivity monitoring system,~~
- ba. The containment sump level monitoring system, and
- eb. ~~A Two containment atmosphere gaseous radioactivity monitoring systems.~~

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:NOTE

Separate Condition entry is allowed for each monitor or system.

- a. With only two of one or more the above required leakage detection systems containment atmosphere radioactivity monitoring system inoperable OPERABLE, operation may continue for up to 30 days provided:
 - 1. grab samples of the containment atmosphere are obtained and analyzed at least once per 24 hours, or when the required gaseous and/or particulate radioactivity monitoring system is inoperable
 - 2. a Reactor Coolant System water inventory balance is performed once per 24 hours in accordance with Surveillance Requirement 4.4.6.2.1.a;*

otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the containment sump level monitor inoperable, operation may continue for up to 30 days provided a Reactor Coolant System water inventory balance is performed at least once per 24 hours in accordance with Surveillance Requirement 4.4.6.2.1.a; * otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With the containment sump level monitor inoperable and one containment atmosphere radioactivity monitoring system inoperable, operation may continue for up to 30 days provided a Reactor Coolant System water inventory balance is performed at least once per 24 hours in accordance with Surveillance Requirement 4.4.6.2.1.a; * otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. The provisions of Specification 3.0.4 are not applicable.

*Not required until 12 hours after establishment of steady state conditions.

SURVEILLANCE REQUIREMENTS

4.4.6.1 The leakage detection system shall be demonstrated OPERABLE by:

- a. ~~Containment atmosphere particulate and gaseous monitoring systems performance of CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST at the frequencies specified in table 4.1.~~
3-Performing a CHANNEL CHECK of the required containment atmosphere radioactivity monitor at least once per 12 hours.
- b. Performing a CHANNEL CHECK of the containment sump level monitor at least once per 12 hours.
- c. Performing a CHANNEL FUNCTIONAL TEST of the required containment atmosphere radioactivity monitor at least once per 31 days.
- bd. Performing a CHANNEL CALIBRATION of the cContainment sump level monitoring system performance of CHANNEL CALIBRATION at least once per 18 months.
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REACTOR COOLANT SYSTEMBASES

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~~3/4.4.6.2 REACTOR COOLANT SYSTEM LEAKAGE~~

~~Industry experience has shown that while a limited amount of leakage is expected from the RCS, the unidentified portion of this leakage can be reduced to a threshold value of less than 1 GPM. This threshold value is sufficiently low to ensure early detection of additional leakage.~~

~~The 10 GPM IDENTIFIED LEAKAGE limitation provides allowances for a limited amount of leakage from known sources whose presence will not interfere with the detection of UNIDENTIFIED LEAKAGE by the leakage detection systems.~~

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REACTOR COOLANT SYSTEM

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3/4.4.6.2 REACTOR COOLANT SYSTEM LEAKAGE

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April 20, 2001

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FROM: Thomas W. Alexion, Project Manager, Section 1 /RA/
Project Directorate IV & Decommissioning
Division of Licensing Project Management

SUBJECT: ARKANSAS NUCLEAR ONE, UNIT 2 RE: DISCUSSIONS REGARDING
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Attachment: As stated

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