



ARKANSAS POWER & LIGHT COMPANY  
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September 20, 1979

1-099-16  
2-099-16

Director of Nuclear Reactor Regulation  
ATTN: Mr. R. W. Reid, Chief  
Operating Reactor Branch #4  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Arkansas Nuclear One-Units 1 & 2  
Docket Nos. 50-313 & 50-368  
License Nos. DPR-51 & NPF-6  
Secondary Water Chemistry  
(File: 1511.1, 2-1511.1, 3720.1, 2-3720.1)

Gentlemen:

In response to your letter of July 23, 1979, and Mr. J. F. Stolz's letter of August 2, 1979, which requested amendments to incorporate a monitoring and control program on secondary water chemistry into each Arkansas Nuclear One (ANO) license as a license condition, the following is provided.

The overriding concern of the above named request as well as your request of August, 1976, for a Technical Specification, was for steam generator tube integrity. We do not agree with the NRC staff position that the requested license condition will significantly promote steam generator tube integrity. ANO presently has an excellent secondary water chemistry monitoring program to limit corrosion of steam generator tubes. This is indicated by our recent ANO-1 steam generator tube inspection which located no defective tubes in either steam generator. The plugging limit, which indicates a defective tube, is based on the minimum tube wall thickness needed to maintain tube integrity during a LOCA combined with a safe shutdown earthquake and an operational allowance to account for time intervals between inspections. Therefore, it is the position of Arkansas Power and Light Company that our existing secondary water chemistry program together with our existing Technical Specifications on steam generator tube leakage and inservice inspection provide a practical and comprehensive means of assuring that steam generator tube integrity is maintained. Our concerns regarding additional down time and high replacement power costs, have in the past provided and will continue to provide assurance that AP&L will devote proper attention to limiting the corrosion of steam generator tubes.

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As always, our secondary water chemistry program is available onsite for review by your inspectors.

Very truly yours,

*David C. Trimble*

David C. Trimble  
Manager, Licensing

DCT:ERG:nak