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Vice President  
Nuclear

April 20, 1990

1CAN049008

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Mail Station P1-137  
Washington, DC 20555

Subject: Arkansas Nuclear One - Unit 1  
Docket No. 50-313  
License No. DPR-51  
TS Change Request - Extension of Surveillance  
Interval (SR 4.6.1.3) for EDG Inspection

Gentlemen:

The next refueling outage (1R9) for ANO-1 is presently scheduled to begin on October 1, 1990. The Emergency Diesel Generator (EDG) 18-month inspections required by ANO-1 Technical Specification (TS) Surveillance Requirement (SR) 4.6.1.3 presently will be required to be performed during September 1990 (18 + 25% dates of 9/12/90 and 9/9/90 for 'A' and 'B' EDGs, respectively), based on previous completion dates during the 1R8 refueling outage in 1988. The performance of this surveillance activity on the EDGs during plant operation would result in the plant entering Limiting Conditions for Operation (LCOs) and would increase the risk of a total loss of AC power during the inspection.

AP&L therefore requests an extension of the allowable surveillance interval for SR 4.6.1.3 to allow performance of the EDG inspections during the 1R9 refueling outage. The ANO-1 EDG vendor has approved an extension to 26 months (mid-December 1990); the proposed change conservatively requires completion of the inspection by December 1, 1990. A copy of the proposed change is attached for your review and approval. Similar extensions have been granted previously: see, for example, Amendment 112 to Fort Calhoun, Docket No. 50-285, dated April 19, 1988, Amendments 25 and 13 to LaSalle, Dockets No. 50-373 and 50-374, dated October 1, 1985, and also recent amendments for Palo Verde and Davis Besse. The basis for this request is similar to those referenced.

In accordance with 10CFR50.91(a)(1), and using the criteria in 10CFR50.92(c), AP&L has determined that the proposed change involves no significant hazards consideration. Our basis for this determination is also attached for your review. The circumstances of this amendment request are neither exigent nor emergency; however, we request your prompt processing.

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AP&L also requests that this change become effective immediately upon NRC issuance of the amendment.

Sincerely,



NSC/rbt  
Attachment

cc: Mr. Robert Martin  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

NRC Senior Resident Inspector  
Arkansas Nuclear One - ANO-1 & 2  
Number 1, Nuclear Plant Road  
Russellville, AR 72801

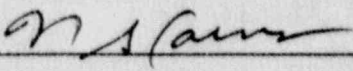
Mr. Thomas W. Alexion  
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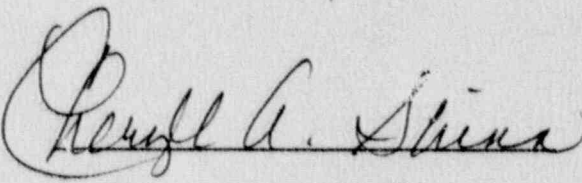
Ms. Greta Dicus, Director  
Division of Radiation Control  
and Emergency Management  
Arkansas Department of Health  
4815 West Markham Street  
Little Rock, AR 72201

STATE OF ARKANSAS    )  
                              )  
COUNTY OF POPE        )       SS

I, N. S. Carns, being duly sworn, subscribe to and say that I am Vice President, Nuclear for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 1CAN049008 and know the contents thereof; and that to the best of my knowledge, information and belief, the statements in it are true.

  
\_\_\_\_\_  
N. S. Carns

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 30 day of April, 1990.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

6-30-91



ATTACHMENT

PROPOSED TECHNICAL SPECIFICATION CHANGES

LICENSE AMENDMENT REQUEST

IN THE MATTER OF AMENDING

LICENSE NO. DPR-51

ARKANSAS POWER & LIGHT COMPANY

ARKANSAS NUCLEAR ONE, UNIT 1

DOCKET NO. 50-313

## DESCRIPTION OF PROPOSED CHANGE

AP&L proposes to modify Surveillance Requirement (SR) 4.6.1.3, which requires an inspection of the emergency diesel generators (EDG) following the manufacturer's recommendations every 18 months, to allow performance of the inspection during the upcoming 1R9 refueling outage. The proposed change will be a one-time exemption to the specified 18 month schedule and reflects the extended length of the present ANO-1 operating cycle (presently estimated at 23 months duration). The proposed change also requires that the inspections be completed by December 1, 1990, which is within the ANO-1 EDG manufacturer's approved extension allowance (from 18 months to 26 months).

## BACKGROUND

The next refueling outage (1R9) for ANO-1 is presently scheduled to begin on October 1, 1990. The Emergency Diesel Generator (EDG) 18-month inspections required by ANO-1 Technical Specification (TS) Surveillance Requirement (SR) 4.6.1.3 presently will be required to be performed during September 1990 (18 + 25% dates of 9/12/90 and 9/9/90 for 'A' and 'B' EDGs, respectively), based on previous completion dates during the 1R8 refueling outage in 1988. The performance of this surveillance activity on the EDGs during plant operation could result in the plant entering Limiting Conditions for Operation (LCOs) and require a plant shutdown.

## DISCUSSION

The SR associated with the EDG require an inspection of each EDG in accordance with the manufacturer's recommendations for this class of standby service every 18 months. The intent of this 18 month interval is to reflect the normal 18 month fuel cycle, so that this inspection, like other similar surveillance activities which could impact LCOs, may be performed during refueling outages. However, the present ANO-1 operating cycle has been extended because of the existing 80% power limitation due to a design deficiency in the ECCS High Pressure Injection (HPI) piping. The EDG inspections were last performed during the 1R8 refueling outage (10/27/88 and 10/24/88 for 'A' and 'B' EDG, respectively) and would be due in June 1990, or in September 1990 considering the TS allowed 25% surveillance interval extension. The 1R9 refueling outage is scheduled to begin October 1990.

The reliability of the ANO-1 EDGs, and the ANO-1 emergency AC power system in general, is sufficient to warrant this extension of the inspection. The reliability of the 'A' EDG is 98.7% and 'B' EDG is 97.5% over the last 156 and 163 start demands, respectively, dating back to January 1985. The EDG manufacturer has also evaluated and approved the inspection extension. In accordance with the manufacturer's recommended conditions for the extension, AP&L is performing trending of certain data (lube oil analysis, load run data, generator readings, etc.) to verify that there is no degradation of key EDG components that would interfere with the safety function of the EDGs.

AP&L therefore proposes to modify SR 4.6.1.3 by adding a notation which states that a one-time exemption to the specified 18 month schedule requirement is allowed so that the EDG inspection may be performed during the 1R9 refueling outage, and be completed no later than December 1, 1990.



#### DESCRIPTION OF PROPOSED NO SIGNIFICANT HAZARDS DETERMINATION

In accordance with 10CFR50.92, AP&L has evaluated whether the proposed change involves a significant safety hazards consideration. AP&L has concluded that the proposed change to SR 4.6.1.3 does not involve a significant hazards consideration because the operation of Arkansas Nuclear One, Unit 1 in accordance with this change would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The monitoring requirements addressed by the proposed change are consistent with those of the plant system currently addressed by the technical specifications. The proposed change maintains the requirement for inspections of the EDGs in accordance with the manufacturer's recommendations, and simply allows a one-time extension of the surveillance interval to reflect the extended ANO-1 cycle length. This extension will allow the surveillances to be performed at the next refueling outage, instead of during plant operation or requiring an unnecessary shutdown. The accident mitigation features of the plant are not affected by the proposed change. The capabilities of the vital standby electrical power systems remain assured under the proposed change.

- (2) Create the possibility of a new or different kind of accident from any previously evaluated.

No new possibility for an accident is introduced by the one-time extension of an allowed surveillance interval. The proposed change involves an extension of an inspection and monitoring function which does not create the possibility of a new or different kind of accident. The change will not allow the EDG to be operated in any new or different way from what is presently allowed.

- (3) Involve a significant reduction in the margin of safety.

The proposed change will maintain the assurance of the availability of the plant vital standby emergency electrical power system. The proposed change will allow performance of the required EDG inspection during an outage period. This will provide a greater margin of safety than requiring the inspection under the existing schedule, which would require each EDG to be out of service for an extended period of time during plant operation, or which would require an unnecessary plant shutdown.

The NRC has provided guidance concerning the application of these standards by providing examples of changes involving no significant hazards considerations. The proposed amendment most closely matches example (iv): A relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated. This assumes that the operating restriction and the criteria to be applied to a request for relief have been established in a prior review and that it is justified in a satisfactory way that the criteria have been met. Several examples exist of similar inspection interval extensions being reviewed and approved by the NRC staff. The bases for this request are similar.

Therefore, based on the evaluation discussed above, AP&L has concluded that the proposed change does not involve a significant hazards consideration.