



Entergy Operations, Inc.
Route 3 Box 137G
Russellville, AR 72801
Tel 501-964-8888

Jerry W. Yelverton
Vice President
Operations ANO

March 19, 1993

1CAN039302

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
Technical Specification Change Request - Modification of C-3 Report
Requirements

Gentlemen:

Attached for your review and approval is a proposed Arkansas Nuclear One - Unit 1 (ANO-1) Technical Specification (TS) change to Table 4.18-2 and specification 4.18.6. This change modifies the Technical Specification requirements for C-3 reports to be consistent with the Babcock and Wilcox Standard Technical Specifications.

The proposed change has been evaluated in accordance with 10CFR50.91(a)(1) using criteria in 10CFR50.92(c) and it has been determined that this change involves no significant hazards considerations. The bases for these determinations are included in the enclosed submittal.

Entergy Operations requests that the effective date of this change be upon issuance of the amendment. This request is neither exigent nor emergency, however prompt review and approval is requested prior to the conclusion of the next ANO-1 refueling outage (1R11) which is currently scheduled to begin in early September 1993.

Very truly yours,

JWY/jjd
Attachment

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PDR ADDCK 05000313
P PDR

ADD 1

cc: Mr. James L. Milhoan
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

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

Mr. Roby Bevan
NRR Project Manager, Region IV/ANO-1
U. S. Nuclear Regulatory Commission
NRR Mail Stop 13-H-3
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Mr. Thomas W. Alexion
NRR Project Manager, Region IV/ANO-2
U. S. Nuclear Regulatory Commission
NRR Mail Stop 13-H-3
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Ms. Greta Dicus
Arkansas Department of Health
Division of Radiation Controls
and Emergency Management
4815 W. Markham Street
Little Rock, AR 72205

STATE OF ARKANSAS)
)
COUNTY OF LOGAN)

ss

Affidavit

I, J. W. Yelverton, being duly sworn, subscribe to and say that I am Vice President, Operations ANO for Entergy Operations, that I have full authority to execute this affidavit; that I have read the document numbered 1CAN039302 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

J. W. Yelverton
J. W. Yelverton

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 19th day of March, 1993.

Sandy Silberman
Notary Public

My Commission Expires:

May 11, 2000

ATTACHMENT

PROPOSED TECHNICAL SPECIFICATION

AND

RESPECTIVE SAFETY ANALYSES

IN THE MATTER OF AMENDING

LICENSE NO. DPR-51

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT ONE

DOCKET NO. 50-313

Proposed Change

It is proposed that the Action Required statements in Technical Specification Table 4.18-2 for C-3 results in the first and second sample inspections be changed to read "Special Report to NRC pursuant to 6.12.5.d" and that Note 2 be revised to read "For C-3 results in one or both steam generators, plug or sleeve defective tubes and provide a Special Report to NRC pursuant to 6.12.5.d." These changes eliminate the requirement to obtain NRC approval of the remedial actions contained in C-3 Reports. A sentence reading "The written Special Report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence" shall be added to Technical Specification 4.18.6 to clarify the contents of a C-3 report. The reference to Specification 6.12.5 is being changed to Specification 6.12.5.d to provide greater specificity.

Background

ANO-1 Technical Specifications 4.18.6, 6.12.5.d and Table 4.18-2 require that if the results of an Inservice Inspection (ISI) of the tubes in either or both steam generators is categorized as C-3 (more than 10% of the total tubes inspected are degraded or more than 1% of the inspected tubes are defective), a special report shall be submitted to the NRC prior to resumption of plant operation. This report is to contain the results of the steam generator tube inspections and a description of the remedial action taken. Currently, the remedial action must receive NRC approval. This requirement for approval of the remedial action was added to Table 4.18-2 by the NRC in Amendment 41. The basis for this addition was not provided in the associated NRC Safety Evaluation Report.

Discussion

This change deletes the requirement for NRC to approve the remedial action described in C-3 reports. This administrative requirement is not present in the previous Standard Technical Specification "Steam Generator Tube Inspection" table (NUREG-0103, Rev. 4), nor is NRC approval of any part of the C-3 report discussed in the recently issued Babcock and Wilcox Standard Technical Specifications (NUREG 1430, Rev. 0). Category C-3 reports will still be submitted prior to resumption of operation and will describe any corrective measures taken.

Since reference to remedial action is being deleted from Table 4.18-2, a description of the contents of a Category C-3 report is being added to Specification 4.18.6. This added sentence is consistent with language found in the Babcock and Wilcox Standard Technical Specifications. The current reference Specification 6.12.5 is also being modified to provide greater specificity by referencing Specification 6.12.5.d (the administrative Technical Specification requiring submittal of a Special Report to the NRC after obtaining Category C-3 results from an Inservice Inspection of steam generator tubes).

A typographical error in Table 4.2-18 introduced during Amendment 118 is also being corrected. In the section of the Table corresponding to the First Sample Inspection, C-3 Result, Action Required, the reference to Specification 6.12.45 is being corrected to "6.12.5.d." Specification 6.12.45 does not exist.

Determination of No Significant Hazards Consideration

An evaluation of the proposed change has been performed in accordance with 10CFR50.91(a)(1) regarding no significant hazards consideration using the standards in 10CFR50.92(c). A discussion of those standards as they relate to this amendment request follows:

Criterion 1 - Does Not Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated.

The proposed change does not affect reactor operations or accident analyses and has no radiological consequences. The proposed change deletes a purely administrative burden and provides clarification to existing Technical Specification requirements concerning Category C-3 Reports. Therefore this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2 - Does Not Create the Possibility of a New or Different Kind of Accident from any Previously Evaluated.

The proposed change deletes an administrative requirement and provides clarification to existing Technical Specification requirements. Since the proposed amendment would not change the design, configuration or method of operation of the plant, it would not create the possibility of a new or different kind of accident from any previously evaluated.

Criterion 3 - Does Not Involve a Significant Reduction in the Margin of Safety.

The proposed change is administrative and concerns reporting requirements only. It does not change a safety limit, an LCO, or a surveillance requirement on equipment required to operate the plant. The NRC retains the authority to review Entergy endeavors and take whatever action deemed necessary to ensure the public health and safety. Therefore, no significant reduction in the Margin of Safety is incurred.

Based on the above evaluation it is concluded that the proposed Technical Specification change does not constitute a significant hazards concern.