



ARKANSAS POWER & LIGHT COMPANY

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June 7, 1982

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Director of Nuclear Reactor Regulation
ATTN: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Director of Nuclear Reactor Regulation
ATTN: Mr. J. F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Purge Valve Concern

Gentlemen:

We have received and reviewed your letter of May 4, 1982. As a result of this review, we feel that we meet the intent of your concerns and that no further action is necessary. Further discussion of our review of your concerns follows.

Your first concern dealt with the request for purge valves to be locked or sealed closed during operation. We have reviewed the various methods suggested in your letter for locking or sealing the purge valves closed. As a result, we still feel our administrative control is adequate and meets the intent of your request. Therefore, we do not feel the expense and manhours involved in physically locking these valves is justified.

Also, in order to purge to outside containment, on Unit 1 you would have to open two valves, and on Unit 2 three valves would have to be opened. The handswitches for the valves in series are separated in the control room. For Unit 1, the switches are approximately 8 feet apart. The Unit 2 switches are also separated, two of the switches are on one panel with the third valve switch on another panel about 10 feet away. These are also spring return to center switches and could not be accidentally opened.

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Finally, in your letters you request that our purge valves be sealed or locked closed to conform to TMI Action Plan Item II.E.4.2. Item II.E.4.2. states, "Sealed-closed purge isolation valves shall be under administrative control to assure that they cannot be inadvertently opened." It also states, "Checking the valve position light in the control room is an adequate method for verifying every 24 hours that the purge valves are closed." As we check the purge valve position light once during each eight-hour shift, we feel that we conform to the intent of Item II.E.4.2.

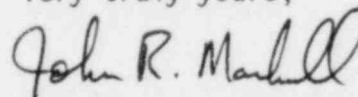
The second issue that you were concerned about dealt with purge valve leakage testing. In your letter, you state, "leakage failures were due to (a) wear induced by operating the valves and/or (b) environmental conditions." As for environmental conditions, Arkansas does not have a severe climate with great changes in seasonal weather conditions. The mean temperature at Russellville, Arkansas in July is 82°F and in January is 42°F. Therefore, environmental conditions should not cause excessive leakage.

The other cause of leakage failures was wear induced by operating the valves. Our valves are not operated during any plant condition except cold shutdown per our Technical Specifications. The typical operation of the purge valves during cold shutdown is to open them at the beginning of the outage and leave the valves open until the end of the shutdown when they are closed and tested. As can be seen, any wear induced leakage would be identified during the local leak rate testing after valve use but prior to required leak tight operability. Therefore, we believe that the present testing program adequately identifies valve seal degradation prior to leakage failure during a plant condition requiring the containment integrity to be maintained.

Additionally, the past history of our purge valves show that of the times the valves failed the leakage test, only once did a seal gasket need to be replaced. The seal replacement was necessary on only one purge valve. This occurred in November 1979. The remainder of the failures were not due to excessive seal wear but, in most cases, was due to an adjusting screw backing out as previously described in our February 7, 1982 letter.

Therefore, as stated in our previous letters, we do not plan to take any further action as we do not feel it is necessary.

Very truly yours,



John R. Marshall
Manager, Licensing

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