



July 5, 1990

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U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Further Information Related to Technical Specification
Change Request for Reactor Coolant System Safety Valves
and Plant System Turbine Cycle Safety Valves

Gentlemen:

On August 22, 1989, Entergy Operations submitted a Technical Specification Change Request for Reactor Coolant System Safety Valves (RCSVs) and Plant System Turbine Cycle Safety Valves (PSTCSVs) by letter 2CAN088903. On February 20, 1990, the staff verbally requested that Entergy Operations submit a statement that the ANO-2 safety analyses would not be affected by the safety valves lifting at a -3% of setpoint. The Technical Specification Change Request (TSCR) involves allowing an "as-found" setpoint tolerance of -3%, +1% of the lift setting of the RCSVs and PSTCSVs. However, the TSCR requires that the setting be reset to within $\pm 1\%$.

A review has been performed of the ANO-2 analysis and determined the following:

- (1) In the case of the RCSVs, the -3% tolerance in combination with the current High Pressurizer Pressure Trip setpoint ensures that the RCSVs will not open prior to reactor trip. Therefore, the current safety analysis assumptions with regard to system response are preserved such that there will be no impact on the consequences of the safety analysis events that open the RCSVs.
- (2) Decreasing the set pressures, and consequently the blowdown pressures, of the PSTCSVs by 3% would not cause any of the results of the safety analysis events to exceed acceptance criteria. The PSTCSVs open during six events only. In all but one of these, there would be essentially no change in the consequences of the event. For one event, the Steam Generator Tube Rupture with Loss of AC Power, the offsite dose could increase by as much as 10%, but the result would remain well within 10CFR 100 limits and below the offsite doses calculated for a Loss of Coolant Accident (bounding case). The increased dose reflects the increased release of steam through the PSTCSVs associated with the affected steam generator prior to its isolation. Following isolation, only steam from the intact steam generator is released and this steam has a lower assumed concentration of radioactive material.

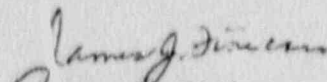
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Entergy Operations would like to emphasize that the TSCR does not seek permission to operate ANO-2 at -3% of setpoint. Since we are not requesting approval to operate at -3% of setpoint, our design basis will remain at $\pm 1\%$ of setpoint and no changes to the Safety Analysis Report required. The approach of not requiring an analysis to be performed is consistent with the Staff's approval of a similar change to the Beaver Valley, Units One and Two Technical Specifications.

This has been discussed with Mr. Chester Poslusny of your staff.

Very truly yours,


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Manager, Licensing

JJF:lw

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