



ARKANSAS POWER & LIGHT COMPANY
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November 15, 1978

2-118-13

Director of Nuclear Reactor Regulation
ATTN: Mr. J. F. Stolz, Chief
Light Water Reactors Branch #1
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPP-6
Emergency Relief to
Technical Specification 3.8.1.1
(File: 2-1511.1)

Gentlemen:

Our letter to you dated November 13, 1978, requested emergency relief to Technical Specification 3.8.1.1. Our request was prompted by mechanical problems causing one of the two emergency diesel generators to be declared inoperable. To preclude this mechanical failure from impacting our startup schedule, we requested a one time relief from Technical Specification 3.8.1.1.b to allow entering into and operation in Modes 3 and 4 with one diesel generator and two offsite power systems operable. Yesterday in a telephone conversation, you requested information on the effects this relief would have on other technical specification requirements. Our review of the Technical Specifications has identified the following items that should be addressed based on having one diesel generator (green channel of onsite power) inoperable.

As stated in our November 13, 1978 letter, in lieu of meeting the Technical Specification 3.8.1.1 requirement of having two separate and independent diesel generators operable in Modes 3 and 4, prior to initial criticality of the ANO-2 reactor, we propose to prove two sources of offsite power to be available by performing Surveillance Requirement 4.8.1.1.1.a and run the operable diesel generator (red channel) in lieu of 4.8.1.1.2. Also we believe the operation of ANO-2 in Modes 3 and 4 in the interim period prior to initial criticality with only two sources of offsite power to be acceptable given the following. Since the ANO-2 reactor has never gone critical, there exists no decay heat to remove from the core or fission products to contain. Therefore there is no safety significance associated with a total loss of power with the possible exception of prevention of boron stratification. We believe, as stated in our September 18, 1978 letter to you, that boron stratification in the core is not credible for at least 96 hours. Therefore no means of reactor coolant circulation via any source of power is required for at least that amount of time. Since the use of Reactor Coolant Pumps (powered only from offsite or auxiliary power) for this purpose is acceptable, the inoperability of a diesel does not affect our capability in this area nor our compliance with the applicable Technical Specification.

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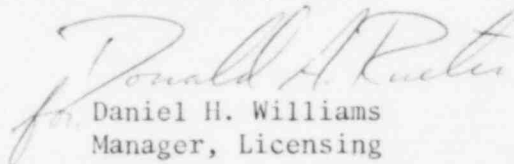
Mr. J. F. Stolz

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For a system, subsystem, train, component or device to be declared operable during the pre-initial criticality interim period for Mode 3 and 4 operation, during which the requested relief would apply, it must be capable of performing its specified function(s). For this interim period the availability of offsite power will be considered to satisfy the power availability aspect of operability requirements for any equipment.

Very truly yours,


for Daniel H. Williams
Manager, Licensing

DHW:DGM:vb