



ARKANSAS POWER & LIGHT COMPANY

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July 12, 1983

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

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

SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Appendix R - Scheduler Exemption
Request for All Barriers and All
Suppression/Detection Systems

Gentlemen:

Please refer to your letter (ØCNAØ68312) dated June 17, 1983, which addressed our request for an exemption to the schedule of 10CFR50.48(c) for all barriers and all penetrations thereto and all suppression/detection systems.

In your letter, you stated you understood these items were required to be in place by April 1, 1983, and we proposed these items would be in place, by our best estimate, by the end of April 1984.

These items are not required to be in place by April 1, 1983, but will be required to be in place according to the schedules of 10CFR50 Appendix R, (i.e., by outage dates, NRC approval plus six months, etc., depending upon the nature of the modifications required to satisfy Appendix R) or schedules proposed and approved in association with an exemption request.

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AP&L believes that the interpretations and assumptions used in our July 1, 1982, submittal are valid and in accordance with 10CFR50 Appendix R. However, on March 1, 1983, the Nuclear Utility Fire Protection Group (NUFPG), of which AP&L is a member, met with NRC personnel, i.e., Messrs. Randy Eberly, John Stang, Dennis Kubicki, Victor Benaroya (Chemical Engineering Branch, Division of Engineering, ONRR), Bill Johnston (Assistant Director, Division of Engineering, ONRR), Tom Wambach (Division of Licensing, ONRR), Leon Whitney (Office of Inspection and Enforcement), and others, to discuss several so-called "generic" fire protection issues. These issues were raised because of apparent differing interpretations and applications of Appendix R criteria. As a result of the meeting, the Staff agreed to formally notify all licensees of the clarified issues, as reflected during the March 1 meeting.

As AP&L's Appendix R analysis and evaluations were performed using assumptions differing from the NRC interpretations (provided during the March 1, 1983 meeting), a total plant reevaluation was necessary in order to comply with these new interpretations. Not waiting to receive formal notification from the Staff, on March 2, 1983, AP&L began reanalyzing ANO in accordance with its perception of the new Staff interpretations. This reevaluation was intended to determine changes (if any) to the plant that would be needed (and beyond those already known) to meet Appendix R.

During March 1983, numerous conversations took place between the AP&L Licensing staff and our NRC Project Managers, Messrs. Oliver Lynch and Guy Vissing, to discuss this reevaluation. The principal issue discussed was AP&L's compliance to Appendix R. As related to the Staff during such conversations, given the new interpretations, it is possible AP&L might have specific items which will require exemption requests to comply with the rule. However, until the reevaluation is completed, these specific areas will remain unknown. As a result of these conversations, the NRC recommended (to assure continued compliance) that AP&L submit an exemption request pursuant to 10CFR50.12 for all barriers and all suppression/detection systems until the new analysis could be completed, at which time AP&L would submit exemption requests for specific fire barriers, suppression systems, etc., as necessary. AP&L complied with the Staff's recommendation and submitted the recommended exemption request in our March 28, 1983, letter (ØCANØ38322).

To date, a substantial portion of the above mentioned reanalysis has been completed. To expedite the analysis, as previously noted, AP&L had not waited for formal notification from the Staff regarding their new interpretations, but had, instead, relied, in good faith, on our understanding of the Staff's position as presented in a Staff internal memorandum (LSØ5-83-Ø4-Ø19, dated April 11, 1983) which summarized the March 1, 1983, meeting. However, AP&L has recently received indications the final Staff clarifications may differ from those presented in the above mentioned summary upon which we relied in our reanalysis. In view of this situation, we believe it would be prudent for AP&L to cease further expedited efforts until the Staff has formally published its clarifications.

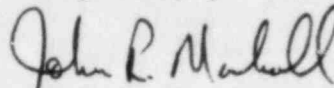
Mr. Stolz/Mr. Clark

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Upon receipt of that documentation, we will immediately reinitiate our expedited efforts and provide you a schedule for completion.

Very truly yours,

A handwritten signature in dark ink, appearing to read "John R. Marshall". The signature is fluid and cursive, with the first name "John" being the most prominent.

John R. Marshall
Manager, Licensing

JRM:DLL:s1