



ARKANSAS POWER & LIGHT COMPANY

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July 18, 1983

ØCANØ78313

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  
Waste Gas System

Gentlemen:

The purpose of this letter is to provide a status and overview of the Waste Gas System upgrades. This is provided as a result of a commitment made in our December 20, 1982, (ØCAN1282Ø9) response to the SALP report.

The hydrogen/oxygen analyzer issue resulted from the NRC's review of the original ANO-1 RETS submittal. The first correspondence concerning this issue was your letter of June 23, 1980 (1CNAØ68Ø22). This letter requested information on the operability of the waste gas system with emphasis on hydrogen/oxygen concentration limits. On September 9, 1980, (1CANØ98ØØ8) AP&L responded to your letter. Our response included a discussion of an evaluation of the Waste Gas System and the proposed modifications that resulted. The hydrogenated portion of the Waste Gas System, including proposed modifications, sampling, and hydrogen/oxygen levels, was discussed.

In our letter of September 26, 1980, (ØCANØ98Ø26) as a result of verbal requests by the NRC staff, AP&L committed to procedure changes to require continuous hydrogen/oxygen monitoring of the surge tank and to submit Technical Specification changes on the waste gas system by October 31, 1980. These proposed changes were submitted as committed.

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From October 31, 1980 until February 25, 1982, no written questions or comments on the AP&L submittal were received. On February 25, 1982, (ØCANØ282Ø9) AP&L committed to install redundant hydrogen/oxygen analyzers. In addition, revised Technical Specification changes reflecting the installation of the hydrogen/oxygen analyzers were to be submitted by April 30, 1982.

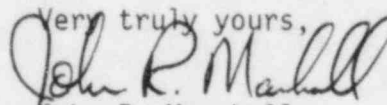
On April 30, 1982, (ØCANØ48223) AP&L indicated a delay in the submittal of the revised Technical Specifications due to the workload of our technical staff in fulfilling other NRC related commitments. On October 12, 1982, (ØCAN1Ø82Ø5) a status of the installation of the redundant analyzers was provided to you. This letter also stated that as a result of the equipment not being scheduled for installation for several months yet, we did not feel it was appropriate to submit Technical Specifications on the analyzers at that time. This reflected the position of the ANO Plant Safety Committee that such a Technical Specification Change could not be approved until the equipment needed to comply was installed and operational. Although AP&L verbally offered to provide a draft Technical Specification for NRC review, this was unacceptable to the NRR Project Manager. In light of this, we feel that the comments made in your letter of November 19, 1982, (ØCNA1182Ø7) stating, among other things, "The performance on the waste gas  $H_2/O_2$  TS change was particularly poor," are inappropriate.

Our efforts to complete this installation are continuing and the delivery of the analyzers is currently scheduled for July 22, 1983, and installation and checkout will be completed approximately four weeks after receipt of equipment. As discussed above, AP&L will submit Technical Specifications upon the successful installation and checkout of the hydrogen/oxygen analyzers.

In addition to our efforts relative to installation of redundant analyzers, it should be noted that substantial engineering effort has been expended related to numerous other upgrades of the Waste Gas System. The modifications made include replacing a large amount of carbon steel pipe with stainless steel and rerouting to minimize the low spots in the system. Also, the diaphragm valves were replaced with packless, globe valves. The vent on the Makeup Tank was rerouted to ensure a slight nitrogen overpressure on the surge tank and extensive rework and replacement of the vacuum degasifier system were performed. This effort, including the redundant analyzers, will require an expenditure of approximately \$377,000.

It is evident from the above history that AP&L is committed to an extensive effort to upgrade the Waste Gas System. A more complete description of the upgrade is provided in our letters of March 19, 1982, (ØCANØ382Ø8) and July 15, 1982, (ØCANØ782Ø5).

Very truly yours,

  
John R. Marshall  
Manager, Licensing

JRM:MCS:rd