



ARKANSAS POWER & LIGHT COMPANY  
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

April 13, 1984

OCAN04B408

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. James R. Miller, 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  
Proposed Technical Specification  
Change Revision - Appendix I (RETS)

Gentlemen:

As requested by your Mr. Bob Lee, the purpose of this letter is to provide NRC with the enclosed submittals:

1. Updated AND-1 Radiological Effluent Technical Specifications (AND-1 RETS) Change Request;
2. Updated AND-2 Radiological Effluent Technical Specifications (AND-2 RETS) Change Request;
3. Updated Offsite Dose Calculation Manual (ODCM) for Arkansas Nuclear One;
4. Solid Waste Process Control Program (PCP) for Arkansas Nuclear One.

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It is AP&L's intent that Enclosures 1, 2, and 3 supercede our September 30, 1983, submittal (OCAN098310). Additionally, Enclosure 4 is intended to be a descriptive overview or "umbrella" document which provides controlled guidance on the appropriate handling of solid radwaste at AND. Any deviations from or changes to the Process Control Program are to be approved by the AND Plant Safety Committee prior to the implementation of the deviation or change.

Enclosure 5 provides an overview of the NRC's requested revisions to the AND-1 and 2 RETS submittal. Compliance with the Process Control Program as described in Enclosure 4 herein will ensure that the major elements of the model Technical Specifications referenced above are adequately addressed. Proposed AND-1 Technical Specifications 6.8.1h and proposed AND-2 Technical Specification 6.8.1i provide for required implementation of the PCP. Also, as presently written, provisions for surveillance requirements are contained within the body of the PCP. Therefore, we feel that the intent of specifications such as 6.13 and 6.15 is adequately addressed by Enclosure 4 and such specifications would be inconsistent with other AND-1&2 Technical Specifications.

As agreed with your staff the reduced dose commitments and dose rates as proposed in Enclosures 1 and 2 are contingent on the use of the methodology and various numerical factors as defined in the enclosed ODCM (Bioaccumulation Factor, Reactor Building Purge Factor, etc.). These revisions to the ODCM (Enclosure 3) were the result of negotiation with the NRC staff during the RETS revision process.

Additionally, per our discussions with the NRC staff, AP&L was requested to provide NRC with a requested implementation date for the AND-1&2 RETS. Provided the NRC approves by June 30, 1984, both the AND-1 and AND-2 RETS as proposed in Enclosures 1 and 2 herein, AP&L could commit to a January 1, 1985, effective date for RETS implementation at AND. Our basis for this date is:

- 1) the logistics of implementing RETS would be better served if the effective date was at the beginning of a calendar year, in as much as new criteria would be applied to calendar year annual dose calculations and;
- 2) we currently need at least six (6) months lead time to procure, develop and implement the necessary software to support the RETS programs as proposed.

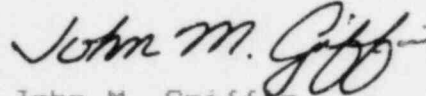
Mr. Stolz/Mr. Miller

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Since these are revisions to previous AND-1&2 Technical Specification Change Requests submitted before the Sholly amendment procedures went into effect, no Significant Hazards Consideration determination is provided. Also, since these are revisions to change requests currently under NRC review, no further fee is remitted.

Very truly yours,

A handwritten signature in cursive script, reading "John M. Griffin".

John M. Griffin,  
Sr. Vice President  
Energy Supply

JMG:DET:jte

Enclosures (5)

STATE OF ARKANSAS       )  
                                  )  
COUNTY OF PULASKI     )

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I, John M. Griffin, being duly sworn, subscribe to and say that I am Senior Vice President, Energy Supply for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document number OCAN048408 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

John M. Griffin  
John M. Griffin

SUBSCRIBED AND SWORN before me, a Notary Public in and for the County and State above named, this 13<sup>th</sup> day of April, 1984.

Sharon Kaye Hendrix  
Notary Public

My Commission Expires:

9-19-89