



ARKANSAS POWER & LIGHT COMPANY  
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000  
May 20, 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  
Comments on Appendix B Technical  
Specification Revisions

Gentlemen:

This is to respond to your letter dated March 11, 1983, (ØCNAØ38315) which issued Amendment Nos. 72 and 40 to Facility Operating License Nos. DPR-51 and NPF-6 for Arkansas Nuclear One, Units 1 & 2 (ANO-1&2). NRC issued these amendments pursuant to our February 15, 1983, (ØCANØ283Ø7) letter which complied with NRC's request for AP&L to make application to delete the remaining nonradiological water quality surveillance requirements from our ANO-1&2 Technical Specifications. NRC requested that AP&L submit the subject Technical Specification change requests in order to comply with recent Atomic Safety Licensing Appeal Board decisions which determined that NRC had no authority for water quality because the Clean Water Act placed this responsibility upon the Environmental Protection Agency. NRC, in the above letter, requested written confirmation regarding a reporting request. Accordingly, we are providing the following which will confirm previous discussions with the NRC staff.

With regard to paragraph 4 of your letter dated March 11, 1983, we agree with NRC's stated intention to rely on the National Pollutant Discharge Elimination System (NPDES) permit system for the regulation and protection of the aquatic environment. However, although the Environmental Protection

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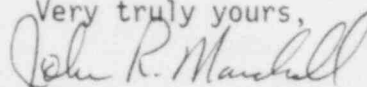
Agency (EPA) administers the NPDES program, NRC requested to be kept informed concerning changes in the NPDES permit for ANO-1&2 and any reportable violations of this permit.

AP&L recognizes the concern NRC has for keeping informed with regard to the ANO-related NPDES matters expressed above. Therefore, effective the date of this letter, AP&L agrees to routinely provide NRC with a copy of any changes to the NPDES discharge permit and a copy of any permit violations requiring notification to the permitting agency. As requested by NRC, we will submit this information to the Region IV Administrator and the Director of the Office of Nuclear Reactor Regulation. It is agreed that this information will be sent to NRC on an "information only" basis for the sole purpose of keeping the NRC staff informed.

There also appears to be an oversight with regard to Section 6 of the subject ANO-1 revision (Amendment 72) in that NRC approved AP&L's request to delete that section in its entirety. However, subsections 6.3 and 6.4 still remain in the body of the Environmental Technical Specifications. This was also discussed with Mr. Vissing and it was agreed that this appeared to be an oversight. NRC will confirm this and issue a correction as appropriate.

Finally, in an attempt to ensure no confusion with regard to radiological versus nonradiological concerns with respect to our Appendix B Environmental Technical Specifications for both ANO-1&2, we inserted the clarifying word "radiological" in several locations in both Technical Specification change requests transmitted by our February 15, 1983, (ØCANØ283Ø7) letter. We have noted, however, that NRC deleted this clarification in several instances. Therefore, we must stress that our aquatic environmental surveillance and reporting requirements as such to NRC for ANO-1&2 now consist of those parameters which are radiological in nature. However, we will provide NRC with informational copies of the nonradiological information as outlined above.

Very truly yours,

  
John R. Marshall  
Manager, Licensing

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