ARKANSAS POWER & LIGHT COMPANY

FIRST NATIONAL BUILDING/P.O. BOX 551/LITTLE ROCK, ARKANSAS 72203/(501) 371-7901

March 16, 1984

JOHN M. GRIFFIN
Vice President
Nuclear Operations

ØCANØ384Ø1

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
NUREG-0737 Technical Specifications -
Generic Letter 83-37

Gentlemen:

The subject letter requested licensees to submit technical specifications as appropriate to cover a number of NUREG-0737 items which were scheduled for implementation after December 31, 1981. AP&L has reviewed the items covered and determined that several changes to our technical specifications are appropriate. For several items, however, we do not believe changes are appropriate. The following is an item by item response for the items listed in Generic Letter 83-37 (ØCNA118306).

1. Reactor Coolant System Vents - Item II.B.1

a. ANO-1: We have attached proposed technical specifications to cover the RCS vents installed at ANO-1. The specifications differ from the NRC suggested version in several areas:

1) AP&L considers it redundant to specify that the vents be "powered from emergency buses." Since the RCS vents are required by 10CFR50.44 to be designed in accordance with

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Appendix A and Appendix B of 10CFR50, the use of appropriate power sources (emergency power) is assured. Also, the definition of OPERABILITY requires that appropriate power sources be available in order to consider a device OPERABLE.

2) Specifying that the vents be closed is also considered unnecessary and even inappropriate. As worded in the suggested format, opening of the vents even if desirable according to procedures, etc. would create a violation of the technical specifications.

3) We believe the intent of the NRC suggested technical specifications was that both reactor coolant system high point (hot leg) vents should be covered. The suggested version appears to only specify one high point vent location.

4) The action statement has been written such that an inoperable vent path must be restored in 30 days, but power need not be removed from remaining valves in the vent path. Power is normally removed from the valves inasmuch as each valve in a venting arrangement is normally de-energized (closed) and requires specific operator action to supply power in order to open the valve (actuating valve-specific handswitches). We believe this allows the best compromise between the need to maintain the capability to vent and the need to maintain the reactor coolant pressure boundary; furthermore, it still provides the necessary attention to correcting a problem valve through the technical specification limiting condition for operation. Please note that the ANO-1 design employs a four valve arrangement at the reactor vessel and both hot leg vent locations. The action statement as proposed would still ensure that the reactor coolant pressure boundary be maintained yet still allow the ability to vent through other valves in the same vent arrangement if it becomes necessary to do so. We believe this meets the intent of the language provided in the Bases section. In addition, the restriction to remove power from all valves in an inoperable vent path would defeat the very purpose of the four valve venting arrangements installed by AP&L.

One final point involves the definition of OPERABILITY as it concerns "vent paths." A vent path has two required functions: 1) to provide a means of venting and 2) the implicit function of maintaining the reactor coolant pressure boundary. Therefore, should one of the four valves in a four valve vent arrangement fail open, we would consider the vent path inoperable even though the capability to vent still remains through other valves in the valve arrangement.

5) The first two surveillance requirements suggested by NRC are redundant to existing requirements in the ANO technical specifications which already cover these valves.

Specifically, the requirement to verify that all manual isolation valves in each vent path are locked in the open position is covered by section 4.0 of the current technical specifications. This section involves inservice inspection for ASME code class 1, 2, and 3 components in accordance with section XI of the ASME Boiler and Pressure Vessel Code. The requirement to cycle each valve in the vent path is also covered by the same program.

b. ANO-2: The comments above correspond to ANO-2 as well except as noted below.

1) Same as ANO-1 comment.

2) Same as ANO-1 comment.

3) Not applicable to ANO-2 (no hot leg vents).

4) The action statement has been modified so that the inoperable vent path be restored within 30 days, but that power not be removed from other valves in the vent path. This is necessary for the same reasons listed for ANO-1, but also because both the pressurizer and reactor vessel vents share a portion of their vent paths. The ANO-2 design provides vent paths for both locations to the quench tank or to containment atmosphere. Therefore, removal of power from all valves in one vent path would render the second vent path inoperable as well.

5) Same as ANO-1 comment except that the appropriate technical specification section is 4.0.5.

2. Post Accident Sampling - Item II.B.3

a. ANO-1: We have attached proposed technical specification changes to cover this item. We believe the Post Accident Sampling program does not require the additional description as provided in your sample technical specification. Rather, it is sufficient to list the program by name under section 6.8.1. This requires the establishment, implementation, and maintenance of written procedures to cover the entire program. The additional language is inconsistent with the current practice of referencing the other programs within section 6.8.1 by title only.

b. ANO-2: The same comments apply to ANO-2.

3. Long Term AFW Evaluation - Item II.E.1.1

a. ANO-1: As you are aware, AP&L is scheduled to implement a major modification of the Emergency Feedwater System during the next refueling outage. As indicated in previous correspondence,

appropriate technical specifications to reflect the new system are being prepared and will be submitted separately on a schedule consistent with the modification.

b. ANO-2: AP&L has completed all submittals concerning NUREG-0737 item II.E.1.1 for ANO-2 and concluded that the present system at ANO-2 is in conformance with NRC requirements. This system is covered by current ANO-2 technical specifications. The NRC has closed out this item by letter dated November 18, 1983 (2CNA118306). Therefore, changes to existing technical specifications are considered unnecessary.

4. Noble Gas Monitors - Item II.F.1.1

a. ANO-1: AP&L is currently working with NRC on a closely-related topic: Radiological Effluent Technical Specifications (RETS). Those technical specifications, when approved, will cover the necessary Limiting Conditions for Operation (LCO's) and Surveillance requirements for the Noble Gas Monitors. Therefore, it is clearly undesirable to specify additional (and possibly conflicting) requirements in a separate location in the technical specifications. Therefore, no proposed changes are submitted in response to this letter; rather, please reference our RETS submittal dated September 30, 1983 (ØCANØ98310).

b. ANO-2: The same comments apply to Unit 2.

5. Iodine Particulate Sampling - Item II.F.1.2

a. ANO-1: The requirements for Iodine and Particulate sampling are addressed by AP&L's Post Accident Sampling program. The governing procedures are therefore covered by the Post Accident Sampling procedures. We have attached proposed technical specification changes which include the Post Accident Sampling procedures in section 6.8.1 of the technical specifications as mentioned in item 2 above. Therefore, no additional changes are necessary.

b. ANO-2: The same comments apply to Unit 2.

6. Containment High Range Monitors - Item II.F.1.3

a. ANO-1: We have included proposed technical specification changes to cover this item. To maintain consistency with the present format of the ANO-1 technical specifications, we have added the operability statement, and measurement range requirements to section 3.5.1. The action statement is incorporated with Table 3.5.1-1. The new reporting requirement resulted in the need for a revision to section 6.12.4. The surveillance requirements are shown in Table 4.1-1.

b. ANO-2: We have attached proposed technical specification changes for this item which are in keeping with the intent of the NRC suggested changes. Some differences are considered appropriate to maintain ANO-2 specific requirements and format.

7. Containment Pressure Monitors - Item II.F.1.4

a. ANO-1: We have provided proposed changes for this item which are in a format consistent with the ANO-1 technical specifications. The LCO's and surveillance requirements are addressed by changes to Tables 3.5.1-1 and 4.1-1.

b. ANO-2: We have provided proposed changes for this item which are very similar in format to the suggested NRC changes. The differences are necessary to ensure consistency with the ANO-2 technical specifications in both technical requirements and format.

8. Containment Water Level Monitor - Item II.F.1.5

a. ANO-1: We have provided proposed changes for the wide range monitors in the same format as item 7. However, we have not included the one channel of narrow range instrumentation in the proposed change. Because the sump level instrumentation is required to be in operation according to the RCS Leakage technical specification (section 3.1.6 and 4.1) we do not believe it is necessary to include it in additional technical specifications.

b. ANO-2: The same comments apply to Unit 2 except the appropriate technical specification reference is section 3.4.6.1 and 4.4.6.1.

9. Containment Hydrogen Monitor - Item II.F.1.6

a. ANO-1: We believe the current technical specifications to be sufficient for providing LCO's and surveillance requirements for the hydrogen analyzers. The analyzers are covered by current specification 3.14.1.f and 4.12.4. These requirements are considered sufficient to ensure acceptable levels of performance efficiency, and reliability of the hydrogen analyzers.

b. ANO-2: The same general comments apply to unit 2 except that the applicable sections are 3.6.4.1 and 4.6.4.1.

10. Inadequate Core Cooling - Item II.F.2

a. ANO-1: Appropriate technical specifications will be submitted in accordance with the implementation schedule for the reactor vessel water level monitoring system. The subcooling margin monitors are already covered in the technical specifications.

b. ANO-2: The same comments apply to Unit 2.

11. Control Room Habitability - Item III.D.3.4

a. ANO-1: Technical Specifications changes have already been submitted and approved for this item. Please reference our letters dated July 14 and August 24, 1982 (1CANØ782Ø3 and 1CANØ88210) and the NRC response dated September 21, 1982 (1CNAØ98205).

b. ANO-2: The same comments apply to Unit 2. Previous ANO-2 technical specifications were judged adequate for this item as described by NRC letter dated February 21, 1982 (ØCNAØ28210).

In addition to the above, technical specification changes relating to one additional NUREG-0737 item are being submitted. Specifically, in accordance with NRC Generic Letter 82-16 (ØCNAØ98214), we are submitting proposed technical specification changes regarding limitation of overtime (item I.A.1.3) for both ANO-1 and ANO-2. As requested by the NRC, the changes require administrative controls be established in accordance with the guidance provided by the NRC Policy statement on working hours, Generic Letter 82-12.

In accordance with 10CFR50.92(c), we have determined the proposed amendment to have no Significant Hazards Consideration (SHC) and are including the basis of our SHC determination as an attachment to the proposed changes. Also, a copy of this amendment package is being forwarded to Mr. E. Frank Wilson, Director, Division of Environmental Health. The circumstances of this proposed amendment are not exigent or emergency.

We have determined this to be a Class I and a Class III amendment pursuant to 10CFR170.22, thus a check for the fee of $4,400 is remitted.

Very truly yours,

John M. Griffin

JMG:CHT:sc

Attachment

cc: Mr. E. Frank Wilson

STATE OF ARKANSAS)
) SS
COUNTY OF PULASKI)

I, John M. Griffin, being duly sworn, subscribe to and say that I am Vice President, Nuclear Operations for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered ØCANØ384Ø1 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

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 20th day of March, 1984.

Notary Public

My Commission Expires:

4-1-85

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed amendment request does not involve a SHC because

(A) operation of Arkansas Nuclear One in accordance with this change would not:

1) involve a significant increase in the probability or consequences of an accident previously evaluated; or
2) introduce the possibility of a previously unanalyzed accident; or
3) involve a significant reduction in a margin of safety; and

(B) the proposed amendment matches the example(s) checked below: (ref: DLOP 288, Federal Register, Vol. 48, p. 14870).

Examples of amendments that are considered <u>not likely to involve</u> SHC:

☐ (i) A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

☒ (ii) A change that constitutes an additional limitation, restriction or control not presently included in the technical specifications: for example, a more stringent surveillance requirement.

☐ (iii) For a nuclear power reactor, a change resulting from a nuclear reactor core reloading, if no fuel assemblies significantly different from those found previously acceptable to the NRC for a previous core at the facility in question are involved. This assumes that no significant changes are made to the acceptance criteria for the technical specifications, that the analytical methods used to demonstrate conformance with the technical specifications and regulations are not significantly changed, and that NRC has previously found such methods acceptable.

☐ (iv) A relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated. This assumes that the operating restriction and the criteria to be applied to a request for relief have been established in a prior review and that it is justified in a satisfactory way that the criteria have been met.

☐ (v) Upon satisfactory completion of construction in connection with an operating facility, a relief granted from an operating restriction that was not yet completed satisfactorily. This is intended to involve only restrictions where it is justified that construction has been completed satisfactorily.

- ☐ (vi) A change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: for example, a change resulting from the application of a small refinement of a previously used calculation model or design method.

- ☐ (vii) A change to make a license conform to changes in the regulations, where the license change results in a very minor changes to facility operations clearly in keeping with the regulations.

- ☐ (viii) A change to a license to reflect a minor adjustment in ownership shares among co-owners already shown in the license.

Examples of amendments that are considered <u>likely to involve</u> SHC:

- ☐ (i) A significant relaxation of the criteria used to establish safety limits.

- ☐ (ii) A significant relaxation of the bases for limiting safety system setting or limiting conditions for operation.

- ☐ (iii) A significant relaxation in limiting conditions for operation and accompanied by compensatory changes, conditions, or actions that maintain a commensurate level of safety (such as allowing a plant to operate at full power during a period in which one or more safety systems are not operable).

- ☐ (iv) Renewal of an operating license.

- ☐ (v) For a nuclear power plant, an increase in authorized maximum core power level.

- ☐ (vi) A change to technical specifications or other NRC approval involving a significant unreviewed safety questions.

- ☐ (vii) A change in plant operation designed to improve safety but which, due to other factors, in fact allows plant operation with safety margins significantly reduced from those believed to have been present when the license was issued.

BASIS: The changes, when implemented, result in more restrictive technical specifications due to the addition of several new "Limiting Conditions for Operation." In addition, they impose additional surveillance requirements and administrative controls not currently included in the Technical Specifications.