



# Entergy Operations

Entergy Operations, Inc.

Route 3 Box 177G  
Russellville, AR 72801  
Tel 501-274-8888

Neil S. "Buzz" Carns  
Vice President  
Operations ANO

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#CAN109102

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Mail Station P1-137  
Washington, DC 20555

Subject: Arkansas Nuclear One - Units 1 and 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6  
Proposed Change to the Operating  
Licenses and Technical Specifications  
Fire Protection Requirements

Gentlemen:

Attached for your review and approval are proposed Operating Licenses (OLs) and Technical Specifications (TSs) changes revising the Arkansas Nuclear One, Unit 1 and 2 (ANO-1 & 2) OLs and TSs. The proposed changes to the OLs are to add the NRC's standard OL condition for Fire Protection. The proposed changes to the TSs will relocate the Fire Protection requirements from the TSs to the respective Safety Analysis Reports (SARs) verbatim. The proposed changes to the ANO-1 & 2 SARs will be transmitted to the NRC under a separate submittal letter. These changes were prepared in accordance with Generic Letters 86-10 and 88-12.

The proposed changes have been evaluated in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c) and it has been determined that this request involves no significant hazards considerations. The basis for this determination is included in the enclosed submittal.

The circumstances of this request are not exigent or emergency. We request that the effective date for these changes be 90 days after NRC issuance of the amendment to allow distribution and procedural revisions necessary to implement these changes.

Very truly yours,

*guy chantz*  
ANSC

NSC:lpi  
Attachments

*ADK*

cc:

Mr. Robert Martin  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

NRC Senior Resident Inspector  
Arkansas Nuclear One - ANO-1 & 2  
Number 1, Nuclear Plant Road  
Russellville, AR 72801

Mr. Thomas W. Alexion  
NRR Project Manager, Region IV/ANO-1  
U. S. Nuclear Regulatory Commission  
NRR Mail Stop 11-D-23  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852

Ms. Sheri Peterson  
NRR Project Manager, Region IV/ANO-2  
U. S. Nuclear Regulatory Commission  
NRR Mail Stop 11-D-23  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852

Ms. Greta Dicus, Director  
Division of Radiation Control  
and Emergency Management  
Arkansas Department of Health  
4815 West Markham Street  
Little Rock, AR 72201

STATE OF ARKANSAS     )  
                              ) SS  
COUNTY OF LOGAN       )

I, J. W. Yelverton, being duly sworn, subscribe to and say that I am General Manager, Plant Operations ANO for Entergy Operations, Inc.; that I have full authority to execute this oath; that I have read the document numbered 0CAN109102 and know the contents thereof; and that to the best of my knowledge, information and belief, the statements in it are true.

J. W. Yelverton  
J. W. Yelverton

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 15th day of October, 1991.

Sandy Liebenmeyer  
Notary Public

My Commission Expires:

May 11, 2000

PROPOSED OPERATING LICENSE AND  
TECHNICAL SPECIFICATION  
CHANGES AND  
RESPECTIVE SAFETY ANALYSIS  
IN THE MATTER OF AMENDING  
LICENSE NOS. DPR-51 AND NPF-6  
ENTERGY OPERATIONS, INC.  
ARKANSAS NUCLEAR ONE, UNITS 1 AND 2  
CKET NOS. 50-313 AND 50-368

## PROPOSED CHANGE

Entergy Operations proposes to revise the Operating Licenses (OLs) and Technical Specifications (TSs) for Arkansas Nuclear One, Unit 1 and 2 (ANO-1 & 2). The proposed changes to the OLs are to add the NRC's standard OL condition for Fire Protection. The proposed changes to the TSs will relocate the Fire Protection requirements from the TSs to the respective Safety Analysis Reports (SARs) verbatim. These changes were prepared in accordance with Generic Letters 85-10 and 88-12.

Enclosure 1 contains the proposed change to the ANO-1 OL. Enclosure 2 contains the proposed changes to the ANO-1 TSs. The proposed changes to the ANO-2 OL and TSs are provided in Enclosures 3 and 4 respectively. The proposed changes to the ANO-1 & 2 SARs will be transmitted to the NRC under a separate submittal letter.

## BACKGROUND

Following the fire at Browns Ferry Nuclear Power Plant on March 22, 1975, the NRC undertook a number of actions to ensure that improvements were implemented in the Fire Protection Programs for all power reactor facilities. Because of the extensive modification to the Fire Protection Programs and the number of open issues resulting from Staff evaluations, a number of revisions and alterations occurred in these programs over the years. Consequently, licensees were requested by Generic Letter 86-10, "Implementation of Fire Protection Requirements", issued April 24, 1986, to incorporate the final NRC-approved Fire Protection Program in their Final Safety Analysis Reports (FSARs). In this manner, the Fire Protection Program -- including the systems, most of the administrative controls and the technical controls, the organization, and other plant features associated with fire protection -- would have a status consistent with that of the other plant features described in the FSAR. In addition, the NRC concluded that a standard license condition, requiring compliance with the provisions of the Fire Protection Program as described in the FSAR, should be used to ensure uniform enforcement of fire protection requirements. Finally, the NRC stated that with the requested actions, licensees may request an amendment to delete the fire protection TSs that would be unnecessary.

Based on lead-plant proposals and the Staff's experience with TSs for new licenses, Generic Letter 88-12 "Removal of Fire Protection Requirements from the Technical Specifications", was issued on August 2, 1988, to provide guidance on removing fire protection requirements from TSs.

## DISCUSSION

The proposed changes add the standard fire protection license condition for both ANO-1 & 2 and remove the fire protection systems and fire brigade staffing requirements from the TSs in accordance with Generic Letters 85-10 and 88-12.

The addition of the fire protection program and implementing procedures to the defined list of items requiring technical review and control requirements in Section 6.0 of the TSs on Administrative Controls reinforces the importance of the Fire Protection Program on plant safety. Therefore, these additions are appropriate and consistent with requirements established for similar programs such as security and emergency plans. The changes to the Administrative Controls in Section 6.0 of the TSs assure a multi-discipline review of proposed changes to those requirements which are removed from the TSs and placed in plant procedures.

Entergy Operations will relocate the requirements which will be removed from the TSs to the SARs for ANO-1&2 verbatim. The proposed changes to the ANO-1 & 2 SARs will be transmitted to the NRC under a separate submittal letter.

Generic Letter 86-10 recommended the removal of fire protection requirements from the TSs. Although a comprehensive Fire Protection Program is essential to plant safety, the basis for this recommendation is that many details of this program that are currently addressed in TSs can be modified without affecting nuclear safety. Such modifications can be made provided that there are suitable administrative controls over these changes. These details, that are presently included in the ANO-1 & 2 TSs, do not constitute requirements necessary to ensure safe operation of the facility and, therefore, do not warrant being in the TSs. It is for this reason, Entergy Operations is proposing these changes to remove the fire protection requirements from the TSs and place them in each unit's SAR. Administrative controls will be in effect which will ensure that there will be a detailed review and analysis of any changes in the Fire Protection Program, including those technical and administrative requirements removed from the TSs to ensure that nuclear safety is not adversely affected. These controls include:

- The TS administrative controls that are applicable to the Fire Protection Program;
- The license condition on implementation of, and subsequent changes to, the Fire Protection Program; and
- The 10CFR50.59 criteria for evaluating changes to the Fire Protection Program as described in the SAR.

The specific details relating to fire protection requirements removed from the TSs by this request include those specifications for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements.

The proposed changes are consistent with the guidance outlined in Generic Letter 88-12. Following implementation of these proposed changes, a significant reduction in the content of the fire protection related TSs will be achieved. Such action is consistent with the objectives of the NRC Technical Specification Improvement Program by reducing both the size and complexity of current TSs.



#### BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Entergy Operations has concluded that the proposed changes to ANO-1 & 2 TSs do not involve a significant hazards consideration because the operation of ANO-1 & 2 in accordance with these changes would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes implement Generic Letter 86-10 and follow the guidelines given in Generic Letter 88-12. These changes are administrative, in that none of the technical requirements are being changed. The proposed changes remove the existing requirements from the TSs and place them verbatim in the SARs which are internally controlled documents. An amendment to the OLs is being added which prevents making changes to the program, which would adversely affect the ability to achieve and maintain safe shutdown without prior approval. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident.

- (2) Create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes to the Fire Protection requirements are administrative in nature since no design features are being modified. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

- (3) Involve a significant reduction in the margin of safety.

The technical requirements for Fire Protection have been moved from the TSs to the SARs verbatim. Design features of ANO-1 & 2 are not being changed. Because the requirements have not changed, operating and testing procedures will, other than for minor changes to reference the SAR instead of the TSs, remain the same. Plant procedures will continue to provide specific instructions for implementing the Fire Protection requirements. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

The NRC has provided guidance concerning the application of these standards by providing examples of changes involving no significant hazards considerations. The proposed amendment most closely matches example (i):

"A purely administrative change to technical specifications; for example, a change to achieve consistency throughout the technical specifications, correction of an error, or changes in nomenclature."

Therefore, based on the evaluation discussed above, Entergy Operations has concluded that the proposed changes do not involve a significant hazards consideration.