



February 5, 1992

OCAN029201

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 & 50-368  
License Nos. DPR-51 & NFP-6  
Response to Generic Letter 91-11  
"Resolution of Generic Issues 48 and 49"

Gentlemen:

The NRC Staff completed the evaluation of Generic Issues (GIs) 48 and 49 as part of the resolution of GI-128, "Electrical Power Reliability." GI-48 and GI-49 address vital ac buses and tie breakers that connect redundant safety-related buses. The NRC Staff's resolution of these generic issues was provided to licensees in Generic Letter (GL) 91-11, "Resolution of Generic Issues 48, 'LCOs for Class IE Vital Instrument Buses,' and 49, 'Interlocks and LCOs for Class IE Tie Breakers'", dated July 18, 1991 (OCNA079112).

As a result of its evaluation, the Staff concluded that unless licensees provide adequate justification that such provisions are not needed at their specific facilities, all licensees should have appropriate procedures to fulfill the following requirements:

1. Limit the time that a plant is in possible violation of the single-failure criterion with regard to the Class IE vital instrument buses and tie breakers,
2. Require surveillances of these components, and
3. Ensure that, except for the times covered in Item (1), the plant is operating in an electrical configuration consistent with the regulations and its design bases.

GL 91-11 requires each licensee to provide the NRC with certification, pursuant to 10CFR50.54(f), that the appropriate procedures conforming to the guidance provided in the generic letter have been implemented or have prepared justification that such procedures are not needed. This submittal provides the requested certifications for Arkansas Nuclear One, Units 1 and 2 (ANO-1 & 2).

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GL 91-11 states that the requirements of this generic letter are satisfied if Combustion Engineering (CE) Standardized Technical Specifications are in use. ANO-2 uses Revision 0 of the CE Standardized Technical Specifications and has procedural guidance in place to implement the Technical Specification requirements. Therefore, the appropriate ANO-2 procedures were not required to be revised due to the guidance provided in GL 91-11.

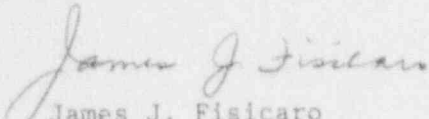
ANO-1 does not utilize standardized technical specifications which already contain the explicit limiting conditions for operation (LCOs) and surveillance requirements on vital instrument buses and tie breakers. In accordance with GL 91-11, Entergy Operations performed a review of the ANO-1 operating procedures. As a result, a weekly surveillance was added to the ANO-1 electrical system operations procedure to verify the correct status of the effected tie breakers, inverters, and DC power supply panels. In addition, certain other procedures were modified to limit the amount of time that vital buses can be powered from alternate sources and ensures that proper alignment during normal plant operation is maintained.

However, based on recent conversations with the NRR Project Manager for ANO-2, it is Entergy Operations' understanding that the current interpretation of the requirements of GL 91-11 is that cross-tying vital buses is prohibited in operating modes other than cold shutdown or refueling. ANO will require until May 8, 1992, to revise the appropriate ANO-1 and ANO-2 procedures to incorporate this interpretation.

Entergy Operations does not believe that the basis for prohibiting even limited cross-tying of buses during power operations within the appropriate technical specification's action statements is clearly supported by discussions in GL 91-11 or its reference documents. This interpretation is also not clearly delineated in the approved standard technical specifications and appears to contradict previous NRC guidance (NRC memorandum of June 13, 1979 from B. K. Grimes to S. E. Bryan). Therefore, we request that further clarification of this position be provided in order to modify our ANO-1 and ANO-2 licensing basis documents.

In accordance with the requirements of 10CFR50.54(f), this letter is being provided under oath. Should you have any questions regarding our response to this issue, please contact me.

Very truly yours,

  
James J. Fisicaro  
Director, Licensing

JJF/RWC/sjf  
Attachment

U. S. NRC  
February 5, 1992  
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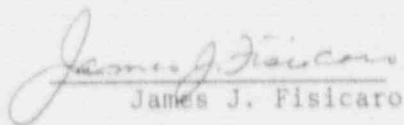
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STATE OF ARKANSAS

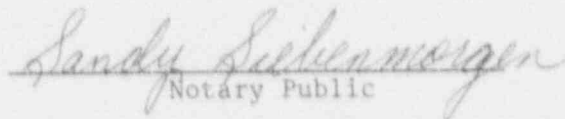
COUNTY OF LOGAN

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I, James J. Fisicaro, being duly sworn, subscribe to and say that I am Director, Licensing at ANO for Entergy Operations, that I have full authority to execute this oath; that I have read the document numbered OCAN029201 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

  
James J. Fisicaro

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 5th day of February, 1992.

  
Notary Public

My Commission Expires:

May 11, 2000