



ARKANSAS POWER & LIGHT COMPANY

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October 16, 1984

2CAN108405

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 - Unit 2
Docket No. 50-368
License No. NPF-6
Technical Specification Change Request for
Hydrogen Analyzer Calibration

Gentlemen:

Please refer to your letter dated August 1, 1984 (2CNA088403), which addressed AP&L's request for an amendment to ANO-2 Technical Specification 4.6.4.1b concerning hydrogen analyzer calibration.

In your letter (0CNA108103) dated October 6, 1981, which documented Inspection Report No. 50-368/81-24, it was stated, "The NRC inspector noted that Technical Specification 4.6.4.1b requires the use of a 4% hydrogen sample gas in the calibration of the hydrogen analyzers. The licensee should propose a change to this specification to account for the increased range (0-10%) of the new hydrogen analyzers which were installed earlier this year. This is an open item (368/8024-06)."

Pursuant to the NRC's request, AP&L initiated a Technical Specification change request to ANO-2 Technical Specification 4.6.4.1b. In that request, we stated the hydrogen analyzer calibration test should be changed to require calibration utilizing zero to ten volume percent hydrogen, with the balance being nitrogen, instead of zero to four volume percent hydrogen, with the balance being nitrogen. This change was submitted in order to comply with the NRC's request.

In your August 1 letter, you stated you have completed your review of our request, and have concluded the present calibration requirement, which is in agreement with the applicable section of the Standard Technical

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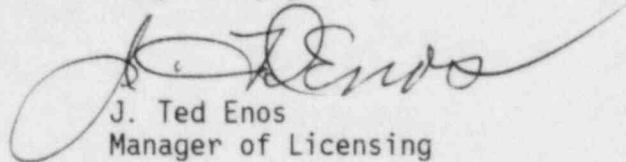
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Specifications (NUREG-0212, Revision 2), is a better requirement than the proposed change, based on the fact that the present requirement would afford a more accurate measurement of hydrogen concentration at or around 4% than the proposed one." Additionally, you state you will deny our request unless we provide you with additional information supporting the proposed change.

As the AP&L Technical Specification change request (which has now been denied) was submitted in response to a NRC request, we do not believe it is appropriate for AP&L to pay a fee for the NRC review. Therefore, we request you reimburse AP&L the \$1,200 fee submitted with our request dated September 27, 1983 (2CAN098312).

Very truly yours,



J. Ted Enos
Manager of Licensing

JTE:LVP:ac