



ARKANSAS POWER & LIGHT COMPANY

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

March 24, 1985

T. GENE CAMPBELL
Vice President
Nuclear Operations

2CANØ38513

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
Proposed Deletion of Appendix B
Technical Specifications

Gentlemen:

This letter transmits a proposed revision to the ANO-2 Technical Specifications to delete Appendix B in its entirety. Appendix 3 to the ANO-2 Technical Specification as originally issued contained various environmental specifications primarily related to radiological and water quality. Two recent Technical Specification amendments, however, have removed or superseded the principal parts of this document such that it may now be deleted in its entirety.

By Amendment 40 dated March 11, 1983, (ØCNAØ38315) NRC approved the deletion of all nonradiological portions of Appendix B related to water quality. This was done following NRC's determination that such items were not within its jurisdiction, but rather were subject to Environmental Protection Agency regulations. By Amendment 60 dated December 14, 1984, (ØCNA128413) NRC later issued major revisions to the requirements for Radiological Effluent Technical Specifications (RETS) pursuant to 10CFR50 Appendix I. These revised specifications were added to Appendix A Technical Specifications and superseded previous Appendix B provisions.

Attachments 2 and 3 contain more detailed justification for the proposed deletion of the remaining sections of Appendix B along with a listing of Appendix B Technical Specifications and the corresponding Appendix A Specification (RETS) Section or other justification for deletion as applicable.

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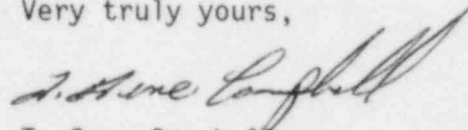
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March 24, 1985

In accordance with 10CFR50.92(c) we have determined the proposed amendment to have no Significant Hazards Consideration and are including the basis of our SHC determination as Attachment 1 to the proposed change. 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.

Pursuant to 10CFR170.12(c) we are including a check in the amount of \$150 as an application fee.

Very truly yours,

A handwritten signature in dark ink, appearing to read "T. Gene Campbell", written in a cursive style.

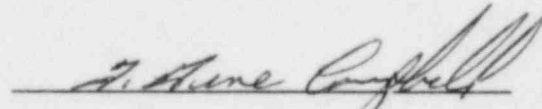
T. Gene Campbell

TGC:DH:ds


Attachments

STATE OF ARKANSAS)
)
COUNTY OF PULASKI) SS

I, T. Gene Campbell, 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 2CANØ38513 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.


T. Gene Campbell

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 24th day of March, 1985.


Notary Public

My Commission Expires:

4-1-85

Attachment 1

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed amendment request does not involve a SHC/NSHC 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) create the possibility of a new or different kind of accident from any previously evaluated;
 - 3) involve a significant reduction in a margin of safety; and
- (B) the proposed amendment most closely matches the example cited below: (ref: DLOP 228, Federal Register, Vol. 48, p. 14870).

Examples of amendments that are considered not likely to involve 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.

BASIS FOR DETERMINATION:

This proposed Technical Specification change will delete the Appendix B Technical Specifications in their entirety. Due to previous changes and the recent issuance of Radiological Effluent Technical Specifications (RETS, as part of Appendix A, the remaining portions of Appendix B can now be deleted. The principal remaining sections of Appendix B address radioactive effluents and radiological environmental monitoring. These areas are now addressed in Appendix A by the recently issued RETS. RETS reflects more current regulatory requirements in this area (10CFR50 Appendix I). Other sections of Appendix B are supportive in nature ("Definitions" and "Administrative Controls").

Therefore this change is deemed not to involve Significant Hazards Considerations for the reasons listed in 1, 2, and 3 above. In addition this proposed change will not result in an adverse effect on the environment.

Attachment 2

SUMMARY OF JUSTIFICATION FOR PROPOSED DELETION OF APPENDIX B TECHNICAL SPECIFICATIONS

Due to previous amendments which have deleted major portions of this document and the recent issuance of new Radiological Effluent Technical Specifications (RETS) the remainder of the document may now be deleted. The principal remaining portions of Appendix B address two major areas. These are radioactive discharges from the plant and the radiological environmental monitoring program to monitor the effect of such discharges on the environment. These two areas are also the principal areas addressed by RETS which is now included in Appendix A. RETS reflects more recent regulatory guidance and is generally more comprehensive and restrictive than the provisions of Appendix B. Since RETS has recently been approved and issued by the NRC the corresponding monitoring requirements can now be deleted from Appendix B (Sections 2.0 and 3.0).

The remainder of the document consist of a supporting structure of definitions (Section 1.0) and administrative controls (Section 5.0) which can also be deleted due to the proposed deletion of the operative sections of the document.

Since the operative portions of Appendix B are now superceded by RETS there will be no adverse effect on the environment as a result of this proposed change.

Attachment 2 contains a listing of Appendix B sections along with the corresponding RETS section or other justification for deletion.

Attachment 3

SECTION BY SECTION JUSTIFICATION FOR DELETION OF
APPENDIX B TECHNICAL SPECIFICATIONS

Appendix B Section No.

Justification for Deletion

1.0 Definitions

This section contains definitions of the following terms; "Environmental Samples", "Gamma Isotopic Analysis", "Radiation Monitor Checks, Test, and Calibration", and "Station and Unit." The sections containing these terms are also deleted by this proposed change, therefore, the definitions may also be deleted.

2.0 Limiting Conditions for Operation

2.1 (previously deleted)

2.2 Radiological

Superseded by Appendix A Section 3/4.11 "Radioactive Effluents."

2.2.1 Liquid Discharges

Superseded by Appendix A Section 3/4.11.1 "Liquid Effluents."

2.2.2 Gaseous Discharges

Superseded by Appendix A Section 3/4.11.2 "Gaseous Effluents."

3.0 Environmental Surveillance

3.1 Surveillance for ANO

This section incorporated by reference the ANO-1 Environmental Monitoring Program. However, Appendix A Section 3/4.12, "Radiological Environmental Monitoring", now contains the applicable requirements for ANO-2.

3.2 (previously deleted)

3.3 (previously deleted)

4.0 (previously deleted)

5.0 Administrative Controls

5.1-5.8

These sections cover the responsibilities of onsite and offsite review committees, procedures, reporting requirements, records retention, etc. Due to the proposed deletion of all other sections of Appendix B, these sections are moot.

Administrative controls applicable to RETS are now included in Section 6.0 of Appendix A and have been previously reviewed and approved by the NRC.

5.9 Special Requirements

This Section is primarily descriptive in nature, providing descriptions of the plant site, transmission right-of-ways and landscaping of the areas in the immediate area of the plant buildings. The landscaping and planting described were completed during initial plant construction. The Section contains no required "action statements" or reporting requirements and does not address items currently addressed by NRC regulations. Therefore, there will be no adverse effect on the environment as a result of the deletion of this section.