



ARKANSAS POWER & LIGHT COMPANY

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

December 21, 1984

T. GENE CAMPBELL
Vice President
Nuclear Operations

2CAN128407

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 Technical Specifications
Involving Steam Generator Low
Level Trip Setpoint

Gentlemen:

Attached are proposed Technical Specifications that incorporate a steam generator low water level trip of 23%.

The original analysis setpoint for the steam generator low water level trip was 5%. This analysis setpoint, when corrected for equipment errors and measurement uncertainties, results in a reactor trip setpoint of $\geq 23\%$ steam generator water level.

During the initial licensing review of ANO-2, questions concerning asymmetric steam generator events were generated. Two options existed to resolve this concern. They were to modify the Core Protection Calculator (CPC) software or to establish a steam generator low water level trip setpoint high enough so that the reactor, in the case of an asymmetric steam generator transient (ASGT), would trip. Due to the time constraints of obtaining an operating license it was decided to raise the steam generator low water level trip analysis setpoint which resulted in an increase in the trip setpoint from 23% to 46.7%.

Handwritten: Flood w/ check #150⁰⁰
#12-8319

B412310280 841221
PDR ADOCK 05000368
P PDR

MEMBER MIDDLE SOUTH UTILITIES SYSTEM

December 21, 1984

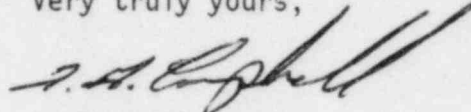
A design change was later incorporated into the CPC software for cycle 2 operation. This change, CPC/CEAC Software Modification 2B/3, included a CPC DNBR penalty based on reactor coolant system cold leg temperature differences caused by an ASGT, and replaced the protection previously provided by the steam generator low level trip. This change was reviewed and accepted by the NRC and incorporated into the Technical Specifications by Amendment No. 24.

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 change. Also, a copy of this amendment package is being forwarded to Mr. E. Frank Wilson, Director, Division of Environmental Health, State of Arkansas.

The circumstances of this amendment are not exigent or emergency. However, we do request your prompt review, as we plan to implement this change during our upcoming refueling outage which is scheduled to begin in March.

Pursuant to 10CFR170.12(c), we are including payment in the amount of \$150 for the processing of this amendment.

Very truly yours,



T. Gene Campbell

TGC:MCS:ds

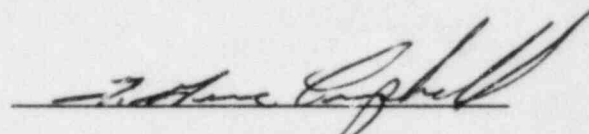
Attachment

cc: Mr. E. Frank Wilson, Director
Division of Environmental Health Protection
State Department of Health
4815 West Markham Street
Little Rock, AR 72201

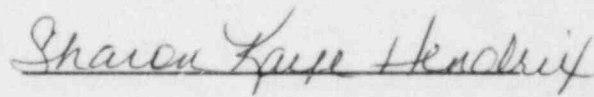
STATE OF ARKANSAS)
)
COUNTY OF PULASKI)

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 2CAN128407 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 21 day of December, 1984.


Notary Public

My Commission Expires:

9-19-89

DESCRIPTION OF AMENDMENT REQUEST

The current Technical Specifications contain a steam generator low water level trip setpoint of 46.7%. This setpoint was developed to protect the fuel in the case of an asymmetric steam generator transient (ASGT). Subsequent to the development of this setpoint a modification to the core protection calculator software was performed that provides a reactor trip in the event of an ASGT. Therefore, AP&L proposes to change the steam generator low water level trip to the original design setpoint which was based upon a loss of feedwater flow incident.

This change to the ANO-2 Technical Specifications will reduce the steam generator (S/G) low water level trip setpoint in Table 2.2-1, Reactor Protective Instrumentation Trip Setpoint Limits, and trip value in Table 3.3-4, Engineered Safety Features Actuation System Instrumentation Trip Values, from $\geq 46.7\%$ to $\geq 23\%$. The allowable value will be changed from $\geq 45.811\%$ to $\geq 22.111\%$ in each of these tables.

BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed amendment request does not involve a Significant Hazards Consideration as it does not involve a significant increase in the probability or consequences of an accident previously evaluated. Additionally, it does not introduce the possibility of a previously unanalyzed accident or involve a significant reduction in the margin of safety.

The Commission has provided guidance concerning the application of these standards by providing certain examples (40FR14870). The proposed amendment matches example (iv). "A relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation was not yet demonstrated. This assumed 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."