

April 25, 1996

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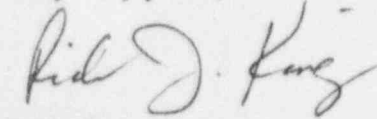
Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Response to NRC Questions Regarding Containment Air Lock Technical
Specification Change Request

Gentlemen:

By letter dated April 4, 1995 (2CAN049511), Entergy Operations requested changes to the Arkansas Nuclear One-Unit 2 (ANO-2) Technical Specifications (TS) to incorporate the provisions of NUREG-1432 specification 3.6.2 into our current TS 3.6.1.3. In your Request For Additional Information (ANO-2 TAC M92068) dated November 15, 1995, you requested specific information and consideration of a revision to our original submittal. Attached is our response to your request and revised pages of the original ANO-2 TS change request. The evaluation related to the determination of significant hazards provided in our original submittal, 2CAN049511, remains unaffected by the change.

Should there be any additional questions regarding this information, please contact me.

Very truly yours,



for DCM/lgm
Attachments

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Response to NRC Questions on Containment Airlock
Technical Specification Change Request

- 1. Please describe the administrative controls that would be implemented with both air locks inoperable for entry and exit (proposed note 2 to action 3.6.1.3.a.). Include the proposed procedure, if available.**

The administrative controls that would be implemented with both air locks inoperable would be the same as with one air lock inoperable. An operator will be stationed locally, at each air lock, to maintain the operable door closed, except for containment entry and exit. The seven day time clock will be tracked by our normal tracking tools, such as; status board entries, station log entries and our shift turnover process. Revisions to procedures are not typically initiated until the requested amendment is approved. . Note that the term "operator", in this case, does not necessarily mean a member of the permanent plant operating staff, but rather a capable individual who has been trained for the specific task.

- 2. Please confirm that the proposed leakage rate of TS 4.6.1.3.1.a. would not result in a total containment leakage above the existing analyses for all evaluated accidents.**

TS 4.6.1.3.1.a is intended to detect degradation of the airlock door seals following the opening and closing of the airlock doors. The proposed air lock door seal leakage rate limit is 1% of the total containment leakage assumed in accident analysis. TS 4.6.1.3.1.b requires the performance of an overall airlock leakage test. This test has a limit of 5% of the total containment leakage assumed in the accident analysis. This test is a Type B test and the results are added to the total of all Type B and C tests. The total of the Type B and C tests must be less than 60% of the total allowed containment leakage. This ensures that the leakage through the airlock will not exceed the leakage assumed in the existing analyses for all evaluated accidents.

- 3. Please describe the controls that would be implemented for entry and exit with an inoperable interlock. Include the proposed procedure, if available. Please confirm that the dedicated individual described in note 4 to TS action 3.6.1.3.b. would be located in the immediate vicinity of the air lock (the submittal states "at the air lock") and would have no other duties than to ensure that at least one air lock door is closed at all times.**

The intended administrative controls for compliance with this specification include stationing an operator in the immediate vicinity of the air lock, with no concurrent duties, to ensure that one door remains closed at all times. Note that the term "operator", in this case, does not necessarily mean a member of the permanent plant operating staff, but rather a capable individual who has been trained for the specific task.

4. The existing ANO-2 TS 3.6.1.3.a.4. specifies that the provisions of TS 3.0.4 are not applicable. Standard TS 3.0.4 states that "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time." The proposed change relocates this statement to 3.6.1.3.d. thus making it applicable to all actions including those that are not indefinite. It appears that this proposed change is not appropriate. Proposed note 2 to TS 3.6.1.3.a. only allows containment entry for seven days with both air locks inoperable due to inoperable air lock doors. Proposed TS 3.6.1.3.c. allows 30 hours to hot standby with one or more air locks inoperable for reasons other than an inoperable door or interlock. Please revise the submittal to correct this item or provide strong justification for the proposed deviation from the STS.

Attached is the revised Technical Specification page with the 3.0.4 exemption removed. When the recommendations of Generic Letter 87-09 were incorporated into the ANO-2 TS, it was determined that an exception to 3.0.4 was necessary to preserve the capability to enter MODE 4 with an inoperable airlock door. When the most recent proposed change was written, ANO incorrectly relocated the 3.0.4 exception to 3.6.1.3.d. Upon further review, ANO has determined that action statement 3.6.1.3.a.2 would permit continued operation in the MODE of Applicability for an unlimited period of time; therefore, an exception to 3.0.4 is not necessary. This position is consistent with the requirements of the Improved Standard TS.

PROPOSED TECHNICAL SPECIFICATION CHANGES

CONTAINMENT SYSTEMS

CONTAINMENT AIR LOCKS

LIMITING CONDITION FOR OPERATION

3.6.1.3 Each containment air lock shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With one containment air lock door inoperable in one or more containment air locks^{1,2}:
 1. Verify that at least the OPERABLE air lock door is closed in the affected air lock within one hour and either restore the inoperable air lock door to OPERABLE status within 24 hours or lock the OPERABLE air lock door closed³.
 2. Operation may then continue provided that the OPERABLE air lock door is verified to be locked closed at least once per 31 days.
 3. Otherwise, be in at least HOT STANDBY within the next six hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the containment air lock interlock inoperable in one or more containment air locks¹:
 1. Verify that at least one OPERABLE air lock door is closed in the affected air lock within one hour and restore the inoperable air lock interlock to OPERABLE status within 24 hours or lock an OPERABLE air lock door closed⁴.
 2. Operation may then continue provided that the OPERABLE air lock door is verified to be locked closed at least once per 31 days.
 3. Otherwise, be in at least HOT STANDBY within the next six hours and in COLD SHUTDOWN within the following 30 hours.
- c. With one or more air locks inoperable for reasons other than those addressed in ACTION a. or b.:
 1. Immediately initiate action to evaluate overall containment leakage per LCO 3.6.1.2.
 2. Verify that at least one door in the affected air lock is closed within one hour and restore the affected air lock to OPERABLE status within 24 hours.
 3. Otherwise, be in at least HOT STANDBY within the next six hours and in COLD SHUTDOWN within the following 30 hours.

¹ Separate ACTION entry is allowed for each air lock.

² With both air locks inoperable, entry and exit is permissible for seven days under administrative controls.

³ Entry and exit is permissible to perform repairs on the affected air lock components.

⁴ Entry and exit is permissible under the control of a dedicated individual.

MARKUP OF CURRENT ANO-2 TECHNICAL SPECIFICATIONS

(FOR INFO ONLY)