



ARKANSAS POWER & LIGHT COMPANY

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

March 13, 1985

T. GENE CAMPBELL
Vice President
Nuclear Operations

2CAN038501

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
Table 3.8-1 Containment Penetration
Conductor Overcurrent Protective Devices
Technical Specification Change Request

Gentlemen:

Attached are proposed Technical Specification changes to Table 3.8-1
"Containment Penetration Conductor Overcurrent Protective Devices."

These proposed Technical Specification changes would revise Table 3.8-1
as follows:

1. Additional containment penetration conductor overcurrent protective devices would be added to the Table.
2. Reactor Coolant System (RCS) sample line solenoid valves 2SV-4632, 2SV-4639, and 2SV-4665 and their associated overcurrent protective devices would be deleted from the Table.
3. Primary and backup protective devices for pressurizer heaters would be changed.
4. Valve 2CV-4697-2 would be replaced by 2CV-4740-2.
5. Typographical errors would be corrected in the Table.

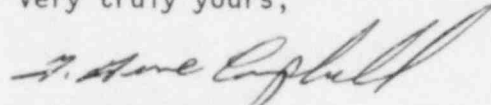
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March 13, 1985

In accordance with 10CFR50.92(c), we have determined the proposed Technical Specification Amendment request as having no Significant Hazards Consideration (SHC) and are including the basis of our SHC determination as part of this amendment package. Additionally, a copy of this amendment package has been sent to Mr. E. Frank Wilson, Director, Division of Environmental Health Protection, State Department of Health.

Also, pursuant to 10CFR170.12(c), we are including a check in the amount of \$150 as application fee. The circumstances of this proposed amendment are not exigent or emergency; however, expeditious handling is requested.

Very truly yours,



T. Gene Campbell

TGC:RBT:ac

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 of Nuclear Operations for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 2CANØ385Ø1 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 13th day of March, 1985.


Notary Public

My Commission Expires:

4-1-85

BASES FOR CHANGE

The basis for each specific change requested is as follows:

- 1) Plant modifications pertaining to Low Temperature Overpressure Protection (LTOP), Pressurizer Spray Valve, and H₂ Purge Valves require the following breakers be added to the table:

<u>Breakers</u>	<u>Design Change Package (DCP)</u>
52-51E4, 52-51C1, 52-51K2, 52-51J4 52-61L2, 52-61D2	LTOP
52-53H3, 52-53H2, 52-61L4, 52-61L1	Pressurizer Spray Valve
52-54G2, 52-54C5, 52-54G3, 52-54B4	H ₂ Purge Valves

- 2) The containment penetration conductor for RCS sample line solenoid valves 2SV-4632, 2SV-4639 and 2SV-4665 is protected by two redundant 6 amp fuses located in panel 2C116. This design eliminates the need for panel 2D21 breaker 26 to be used as the backup device in Table 3.8-1. 125 VDC circuits protected by two fuses in series are not required to be listed in Table 3.8-1 (the Table identifies breakers - active, testable devices - referenced by Technical Specifications 3/4.8.2.5); therefore, reference to these sample valves and their penetration conductor protective devices can be deleted.
- 3) The primary overcurrent protective devices listed in Table 3.8-1 for the pressurizer proportional and backup heaters are located inside the containment building and would not protect the penetration should a fault occur between the protective devices in containment and the penetration itself. Engineering analysis has determined that the main load center feeder breakers 52-512, 52-612, 52-912 and 52-1012 are acceptable for use as backup protective devices for these penetrations. These breakers are located outside containment. Table 3.8-1 is revised to substitute these load center feeders as backup protective devices for the proportional and backup pressurizer heaters. Primary protective devices for these penetrations will be 480 volt load center breakers 52-523, 52-623, 52-922, 52-923, 52-1022 and 52-1023.
- 4) Pressurizer vent valve 2CV-4697-2 has been removed and replaced with valve 2CV-4740-2 by an ANO-2 DCP.
- 5) Typographical errors were corrected on pages 3/4 8-16, 3/4 8-17, and 3/4 8-18 of Table 3.8-1.

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed amendment request does not involve a SHC because 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;
- 2) create the possibility of a new or different kind of accident from any previously evaluated; or
- 3) involve a significant reduction in a margin of safety.

The proposed amendment does not exactly match any one of the examples referenced in the DLOP 228, Federal Register, Vol. 48, p. 14870, so each part of the amendment was evaluated separately.

Two examples that more closely match our amendment request and are considered not likely to involve SHC are (i) and (ii):

- (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.
- (ii) A change that constitutes an additional limitation, restriction or control not presently included in the Technical Specifications: for example, a more stringent surveillance requirement.

The SHC basis for the proposed changes to Technical Specification Table 3.8-1 are itemized below.

1. Examples (i) and (ii) describe this portion of the proposed change. This change adds items to Table 3.8-1 to reflect plant modifications (DCPs) and will achieve consistency of the Technical Specifications with plant design.
2. Example (i) describes this portion of the proposed change. Reference to the sample valve conductor fuse can be deleted because Table 3.8-1 is a list of testable (active) devices (breakers) and because there is adequate passive overcurrent protection for this penetration conductor.
3. Examples (i) and (ii) describe this portion of the proposed change in that this change reclassified specific breakers as primary overcurrent protection devices and identified specific load center main feeder breakers as backup protection devices based on engineering analysis.
4. Example (i) describes this portion of the proposed change. This change reflects replacement of a valve by a DCP.
5. Example (i) describes this portion of the proposed change in that typographical errors in Table 3.8-1 were corrected.