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U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Clarification of Testing and Surveillance
Requirements for the AAC Diesel Generator

Gentlemen:

The purpose of this letter is to clarify a statement made in a 1992 letter from Arkansas Nuclear One (ANO) to the NRC regarding the testing and surveillance requirements for the alternate AC (AAC) diesel generator. It appears there was a misinterpretation of this statement as evidenced by the discussion of surveillance testing in the AAC diesel generator safety evaluation report (SER). The misinterpretation was first recognized during a recent self-assessment regarding the implementation of regulatory commitments for the AAC diesel generator.

During the review of the safety evaluation report dated December 18, 1992, "Conceptual Design for Station Blackout Modification - Arkansas Nuclear One, Units 1 and 2" (0CNA129208), it appears there was a misinterpretation of an ANO statement made in a letter to the NRC dated August 14, 1992, "Conceptual Design for Station Blackout Modification" (0CAN089203). The SER states in section 3.4, "Testing and Maintenance," that *"The licensee stated that all testing and surveillance requirements that presently apply to the Class 1E emergency diesel generators (EDGs) will be applied to the AAC power source."*

While this is an accurate restatement of the earlier correspondence to the NRC, the statement in ANO's August 14, 1992, letter was intended to convey the desire at that point in time regarding use of the AAC diesel generator. At that time, ANO was considering utilizing the AAC diesel generator as a dedicated substitute for a Class 1E EDG if a decision was made to petition the NRC for a technical specification LCO extension. No distinction was drawn in the SER that this level of testing and surveillance was dependent on receiving favorable NRC consideration regarding technical specification limiting condition for operation (LCO) relief on

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the Class 1E EDGs. The misunderstanding of the statement was overlooked during ANO's initial review of the SER in December 1992.

ANO's current philosophy regarding utilizing the AAC diesel generator for allowed outage time (AOT) extensions is provided in ANO's letter to the NRC dated May 2, 1996, "Technical Specification Change Request Regarding Emergency Diesel Generator Allowed Outage Time Extension" (0CAN059603). In this letter ANO proposes to extend the allowed outage time for each unit's EDGs from seven days on ANO-1 and ANO-2 (as proposed by letter 2CAN059501 extending the AOT from three days to seven days with a once per cycle 10 day AOT) to include a once per cycle extension of an additional seven days per machine (for a total of 14 days) considering the availability of the AAC diesel generator. The AAC diesel generator is credited for its availability utilizing probabilistic safety analysis techniques. Our current philosophy represents a change from the position presented in the August 14, 1992, letter in that the AAC diesel generator is not utilized as a dedicated replacement power source for the Class 1E EDGs. Credit has been taken for its availability as an alternate AC power supply in the risk evaluation associated with having an EDG out of service.

The testing and surveillance requirements for the AAC diesel generator will be conducted in accordance with the guidelines of NUMARC 87-00, "Guidelines and Technical Bases for NUMARC Initiatives Addressing Station Blackout at Light Water Reactors," with additional testing as necessary to meet reliability goals. Consistent with Part B.10, this testing includes a quarterly test which involves starting the AAC diesel generator and bringing it to operating conditions that are consistent with its function as an AAC power source. Also, once every eighteen months, a timed start (within the time period specified under blackout conditions) and rated load capacity test will be performed.

Should you have any questions or comments, please contact me.

Very truly yours,

Dwight C. Mims

Dwight C. Mims
Director, Nuclear Safety

DCM/dwb

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