



ARKANSAS POWER & LIGHT COMPANY

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

August 30, 1985

T. GENE CAMPBELL
Vice President
Nuclear Operations

2CAN088502

Director of Nuclear Reactor Regulation
ATTN: Mr. Edward J. Butcher, Acting 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
for the Sodium Hydroxide Addition System

Gentlemen:

Attached is a revision to a previously submitted proposed Technical Specification change request pertaining to the sodium hydroxide addition system. The purpose of this revision is, as discussed with your staff, to clarify our previous submittal dated January 28, 1985 (2CAN018502).

In our previous submittal the current Technical Specification (4.6.2.2.e) was reworded to clarify the purpose of the required surveillance. This purpose is to ensure an adequate flow path from the discharge of the sodium hydroxide addition pump to the containment spray pump discharge. The specification is not intended to require a sodium hydroxide pump test as this is required to be performed in accordance with ASME Section XI by Technical Specification 4.0.5. Our January 28, 1985 submittal required a flow of 14 gpm. However, based on our discussion with your staff this flow requirement has been changed to 13 gpm. This was done to make the flow test requirements consistent with the sodium hydroxide system flow rate of 13 gpm as described in FSAR section 6.2.

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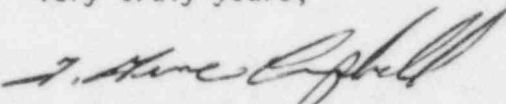
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August 30, 1985

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.

As an application fee was remitted with our previous submittal, no fee is remitted.

Very truly yours,



T. Gene Campbell

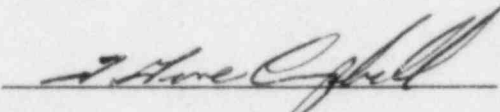
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Attachment

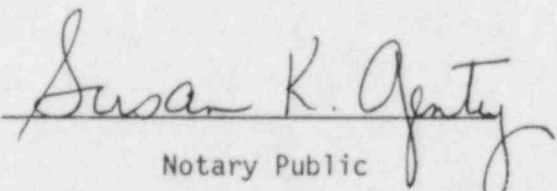
cc: Mr. E. Frank Wilson, Director
Division of Environmental Health Protection
State Department of Health
4815 West Markham Street
Little Rock, AR 72201

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 2CAN088502 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 30 day of August, 1985.


Notary Public

My Commission Expires:

May 7, 1993

DESCRIPTION OF AMENDMENT REQUEST

The current Technical Specification, 4.6.2.2.e, requires that every five years the flow rate through the sodium hydroxide addition path be verified to be at least 14 gpm. The purpose of this specification is to ensure adequate piping capacity to deliver the required NaOH to the containment spray line. The sodium hydroxide addition pumps flows and their suction piping flows are verified once per month in accordance with ASME Section XI as required by Technical Specification 4.0.5. The present wording of Technical Specification 4.6.2.2.e could be interpreted to require each of the two sodium hydroxide addition pumps to provide a minimum flow rate of 14 gpm which is beyond its design capacity of 13 gpm. As discussed in Section 6.2 of the ANO-2 FSAR, each train of the sodium hydroxide addition system is designed to provide a sodium hydroxide solution to the containment spray system, when required at a flow rate of 13 gpm. The design of the sodium hydroxide addition system including its two pumps was reviewed and approved by the NRC staff in its Safety Evaluation Report (NUREG-0308) of November 1977. Under the proposed change, each train of the sodium hydroxide addition system from the sodium hydroxide addition pump discharge to the containment spray pump discharge would be tested at a minimum flow rate of 13 gpm.

BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

This proposed Technical Specification change does not involve a significant increase in the probability or consequences of an accident previously evaluated as there will be no change to plant configuration or operating procedures.

The possibility of a previously unanalyzed accident is not introduced as the sodium hydroxide system will be tested at the design flow rate of 13 gpm which is the condition assumed in safety analyses.

This proposed change only clarifies the testing requirements of the sodium hydroxide system. No actual change to the plant or plant procedures is involved. Thus, the margin of safety is not reduced.

Therefore, based upon the above, the proposed amendment does not involve a Significant Hazards Consideration.

The Commission has provided guidance concerning the application of these standards by providing certain examples (48FR14870). The proposed amendment matches example (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." as it clarifies the intent of the Technical Specifications.