



ARKANSAS POWER & LIGHT COMPANY
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October 12, 1978

2-108-4

Director of Nuclear Reactor Regulatory
ATTN: Mr. J. F. Stolz, Chief
Light Water Reactors Branch #1
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Arkansas Nuclear One- Unit 2
Docket No. 50-368
License No. NPF-6
CPC Documentation
(File: 2-1510)

Gentlemen:

PROPRIETARY VERSIONS CONTROLLED &
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Arkansas Power and Light Company made commitments to the Nuclear Regulatory Commission to resolve CPC Position 19 in our letters dated May 11, 1978. These commitments were discussed with the NRC staff in late March and early April and are summarized as follows:

1. The NRC requirement for addition of multi-variable transient capability would be added to the Single Channel Test Facility through the incorporation of the Dynamic Software Verification Test (DSVT) into the software test program.
2. The NRC requirement for single channel exercise of the high power selection would be met by re-test of the single channel with this feature being exercised.
3. The NRC requirement for qualification of the CPC/CEAC/Operator's Module interfaces would be met by the addition of a CEAC to the Single Channel Test Facility.
4. The NRC requirement for comparison of single channel test facility and 4-channel response would be met through use of DSVT tests on both systems, with the results being compared.
5. Updates of documentation resulting from 1 through 3 above would result in submittal of a modified CPC Single Channel Qualification Test Report (CEN-71 (A)-P) and a modified CPC Software Change Procedure (CEN-39(A)-P).

Supplement No. 2 to Safety Evaluation Report for ANO-2 was issued in August

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1978. This report required that additional information be submitted that describes the process noise testing to be performed in the qualification of software changes.

At a meeting among AP&L, C-E and the NRC Staff on August 31, 1978, discussions were held to present the intended text of CEN-39(A)-P with regard to Phase II test case selection, Phase II test acceptance criteria, and inclusion of process noise tests during qualification of software changes. Follow-up telephone calls with the NRC Staff resolved some wording problems that were not resolved during the meeting.

Pursuant to the above commitments enclosed are:

X CEN-39(A)-P Rev. 1 (proprietary copies 13 through 20).
CEN-39(A)-P Supplement 1P (proprietary copies 13 through 20).
CEN-71(A)-P Supplement 1P (proprietary copies 13 through 20).

Proprietary copy nos. 1 through 5 of the above documents were previously provided to Mr. L. Beltracchi on September 22, and September 29, 1978.

During the process of modifying CEN-39(A)-P, portions of the text and a number of appendices were combined and expanded into a supplement to CEN-39(A)-P. This was done to isolate (1) less detailed portions of the procedure stating what must be done during software modifications (now in the body of CEN-39(A)-P) from (2) highly detailed step-by-step procedures for performing implementation of software changes (now in supplement to CEN-39(A)-P). This supplement contains details of procedures for the updating and assembly of CPC/CEAC source files and the integration of the CPC/CEAC system software and procedures for generation of CPC/CEAC reference and test disks.

Certain information contained in the enclosures is proprietary to Combustion Engineering, Inc. Pursuant to 10CFR2.790, it is requested that this information be withheld from public disclosure. Also, in accordance with 10CFR-2.790(b) it is recognized that withholding this information from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the information. The non-proprietary versions of all enclosed proprietary documents are enclosed. Non-proprietary information on the CPC system software is also contained in Appendix 7A of the ANO-2 FSAR. In addition the affidavits specified by 10CFR2.790(b) are enclosed. This information has been characterized as proprietary for one or more of the following reasons:

1. The use of the information by a competitor would substantially decrease his expenditures, in time and resources, in designing, producing or marketing a similar product.
2. This information consists of test data or other similar data concerning a process method or component, the application of which results in a substantial competitive advantage to Combustion Engineering, Inc.

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3. The information reveals special aspects of a process, method, component or the like, the exclusive use of which results in a substantial competitive advantage to Combustion Engineering, Inc.

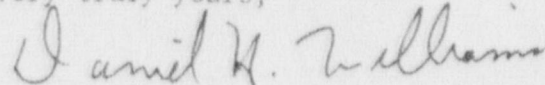
The information considered to be proprietary has been denoted by vertical brackets in the margins.

If you should have any questions concerning the proprietary nature of the material transmitted herewith, please address these questions to:

Mr. A. E. Scherer
Licensing Manager (9438-401)
Combustion Engineering, Inc.
1000 Prospect Hill Road
Windsor, Connecticut 06095

We also request that you provide a copy of any questions concerning the proprietary nature of this submittal to the Arkansas Power and Light Company.

Very truly yours,



Daniel H. Williams
Manager, Licensing

DHW:CSP:jaj

Enclosures