

MAY 23 1975

Docket No. 50-313

Arkansas Power and Light Company
ATTN: Mr. J. D. Phillips
Senior Vice President
Production, Transmission and
Engineering
Sixth and Pine Streets
Pine Bluff, Arkansas 71601

Gentlemen:

Please replace pages 24 and 75 which contain typographical errors and add page 47 of Change No. 2 to the Technical Specifications attached to Amendment No. 2 to Facility Operating License No. DPR-51 dated May 9, 1975 with the attached pages of the same numbers. Page 24, item 9) is corrected to read "gross specific activity in primary = 72/E μCi/gm". Page 47 is being added to simplify changing the specification pages. Page 75, Note 6, line 2 of paragraph 2 is corrected to read, "of prior operation is greater than 10 percent of Specification 3.1.4.1, a".

Sincerely,

Original signed by
Dennis L. Ziemann

Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Reactor Licensing

Enclosures:
Pages 24, 47, and 75 of
Technical Specifications

cc w/enclosures:
See next page

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- 5) steam mass released to environs = 2.84×10^5 lbs.
- 6) primary coolant released to secondary (34 minutes) = 8.7×10^4 lbs.
- 7) minimum primary to secondary iodine equilibrium activity ratio = 20 to 1 (for 1 gpm leakage).
- 8) specific I-131 dose equivalent activity = $3.5 \mu\text{Ci/gm}$ (Primary)
= $0.17 \mu\text{Ci/gm}$ (Secondary).
- 9) gross specific activity in primary = $72/\bar{E} \mu\text{Ci/gm}$.
- 10) $X/Q = 7.0 \times 10^{-4} \text{ sec/m}^3$ at limiting point beyond site boundary of 1046 meters for 30 m release height - equivalent to ground level release due to topography including building wake effect for 5 percentile meteorology.
- 11) total gross radioactivity in primary coolant released to secondary coolant released to environs.
- 12) ten percent of the combined radioiodine activity from primary activity in secondary coolant and secondary activity present in steam mass (released to environs) assumed released to environs.

The whole body dose resulting from immersion in the cloud containing the released activity would include both gamma and beta radiation. The gamma dose is dependent on the finite size and configuration of the cloud. However, the analysis employed the simple model of the semi-infinite cloud, which gives an upper limit to the potential gamma dose. The semi-infinite cloud model is applicable to the beta dose, because of the short range of beta radiation in air. The resulting whole body dose was determined to be less than 0.5 Rem for this accident.

The thyroid dose from the steam generator tube rupture accident has been analyzed assuming a tube rupture at full load and loss of offsite power at the time of the reactor trip, which results in steam release through the relief valves in the period before the faulty steam generator is isolated and primary system pressure is reduced. The limiting iodine activities for the primary and secondary systems are used in the initial conditions. One-tenth of the iodine contained in the liquid which is converted to steam and passed through the relief valves is assumed to reach the site boundary. The resulting thyroid dose from the combined primary and secondary iodine activity released to the environs was determined to be 1.5 Rem for this accident.

The limit for secondary iodine activity is consistent with the limits on primary system iodine activity and primary-to-secondary leakage of 1gpm. If the activity should exceed the specified limits following a power transient, the major concern would be whether additional fuel defects had developed bringing the total to above expected levels. From the observed removal of excess activity by decay and cleanup, it should be apparent whether activity is returning to a level below the specification limit. Appropriate action to be taken to bring the activity within specification include one or more of the following: gradual decrease in power to a lower base power, increase in letdown flow rate, and venting of the makeup tank gases to the waste gas decay tanks.

6. If a control rod in the regulating or axial power shaping groups is declared inoperable per Specification 4.7.1.2, operation above 60 percent of the thermal power allowable for the reactor coolant pump combination may continue provided the rods in the group are positioned such that the rod that was declared inoperable is maintained within allowable group average position limits of Specification 4.7.1.2 and the withdrawal limits of Specification 3.5.2.5.3.

3.5.2.3 The worth of a single inserted control rod shall not exceed $0.65\% \Delta k/k$ at rated power or $1.0\% \Delta k/k$ at hot zero power except for physics testing when the requirements of Specification 3.1.8 shall apply.

3.5.2.4 Quadrant tilt:

1. Except for physics tests, if quadrant tilt exceeds 4%, power shall be reduced immediately to below the power level cutoff (see Figures 3.5.2-1A and 3.5.2-1B). Moreover, the power level cutoff value shall be reduced 2% for each 1% tilt in excess of 4% tilt. For less than 4 pump operation, thermal power shall be reduced 2% of the thermal power allowable for the reactor coolant pump combination for each 1% tilt in excess of 4%.
2. Within a period of 4 hours, the quadrant power tilt shall be reduced to less than 4%, except for physics tests, or the following adjustments in setpoints and limits shall be made:
 - a. The protection system maximum allowable setpoints (Figure 2.3-2) shall be reduced 2% in power for each 1% tilt.
 - b. The control rod group withdrawal limits (Figures 3.5.2-1A and 3.5.2-1B) shall be reduced 2% in power for each 1% tilt in excess of 4%.
 - c. The operational imbalance limits (Figure 3.5.2-3) shall be reduced 2% in power for each 1% tilt in excess of 4%.
3. If quadrant tilt is in excess of 25%, except for physics tests or diagnostic testing, the reactor will be placed in the hot shutdown condition. Diagnostic testing during power operation with a quadrant power tilt is permitted provided the thermal power allowable for the reactor coolant pump combination is restricted as stated in 3.5.2.4.1 above.
4. Quadrant tilt shall be monitored on a minimum frequency of once every two hours during power operation above 15% of rated power.

3.5.2.5 Control rod positions:

1. Technical Specification 3.1.3.5 (safety rod withdrawal) does not prohibit the exercising of individual safety rods as required by Table 4.1-2 or apply to inoperable safety rod limits in Technical Specification 3.5.2.2.
2. Operating rod group overlap shall be $25\% \pm 5$ between two sequential groups, except for physics tests.

- (2) A radiochemical analysis shall consist of the quantitative measurement of the activity for each radionuclide which is identified in the primary coolant 15 minutes after the primary system is sampled. The activities for the individual isotopes shall be used in the determination of \bar{E} . A radiochemical analysis and calculation of \bar{E} and iodine isotopic activity shall be performed if the measured gross activity changes by more than 10 $\mu\text{Ci/gm}$ from the previous measured level. The gamma energy per disintegration for those radioisotopes determined to be present shall be as given in "Table of Isotopes" (1967) and beta energy per disintegration shall be as given in USNRDL-TR-802 (Part II) or other references using the equivalent values for the radioisotopes.
- (3) In addition to the weekly measurement, the radioiodine concentration shall be determined if the measured gross radioactivity concentration changes by more than 10 $\mu\text{Ci/gm}$ from the previous measured level.
- (4) Iodine isotopic activities shall be weighted to give I-131 dose equivalent activity.
- (5) In addition to the weekly measurement, the radioiodine concentration shall be determined if there are indications that the primary to secondary coolant leakage rate has increased by a factor of 2.
- (6) Whenever the steady state radioiodine or gross radioactivity concentration of prior operation is greater than 1 percent but less than 10 percent of Specification 3.1.4.1, a sample of reactor coolant shall be taken within 24 hours of any reactor criticality and analyzed for radioactive iodines of I-131 through I-135 and gross radioactivity as well as the coolant sample and analyses required by the above.

Whenever the steady state radioiodine or gross radioactivity concentration of prior operation is greater than 10 percent of Specification 3.1.4.1, a sample of reactor coolant shall be taken prior to any reactor criticality and analyzed for radioactive iodines of I-131 through I-135 and gross radioactivity as well as the coolant sample and analyses required by above.

- (7) Not required when plant is in the cold shutdown condition or refueling shutdown condition.
- (8) O₂ analysis is not required when plant is in the cold shutdown condition or refueling shutdown condition.
- (9) Required only when fuel is in the pool and prior to transferring fuel to the pool.
- (10) Not required when not generating steam in the steam generators.