Mr. C. Randy Hutchinson
Vice President, Operati[illegible]NO
Entergy Operations, Inc.
1448 S. R. 333
Russellville, AR 72801

Aug 26, 1999

SUBJECT: ARKANSAS NUCLEAR ONE, UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS RE: ADMINISTRATIVE CHANGES TO THE TECHNICAL SPECIFICATIONS (TAC NOS. MA4368 AND MA4382)

Dear Mr. Hutchinson:

The Commission has issued the enclosed Amendment No. 198 to Facility Operating License No. DPR-51 and Amendment No. 209 to Facility Operating License No. NPF-6 for the Arkansas Nuclear One, Units 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated November 24, 1998, as supplemented by letters dated February 25, 1999, and July 14, 1999.

The amendments revise the administrative sections of the TSs to reflect the approved consolidated quality assurance program, clarify the responsibilities of the shift technical advisor position on shift, simplify the contents of the monthly operating report description, complete the relocation of the fire protection requirements from the TSs to the fire protection program, and replace selected position titles with descriptions of functional responsibility.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

/s/ by N.Hilton

Nicholas D. Hilton, Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-313 and 50-368

Enclosures: 1. Amendment No. 198 to DPR-51
2. Amendment No. 209 to NPF-6
3. Safety Evaluation

cc w/encls: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-313

ARKANSAS NUCLEAR ONE, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 198
License No. DPR-51

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Entergy Operations, Inc. (the licensee) dated November 24, 1998, as supplemented by letters dated February 25, 1999, and July 14, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(2) of Facility Operating License No. DPR-51 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 198 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of the date of issuance and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert A Gramm

Robert A. Gramm, Chief, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: August 26, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 198

FACILITY OPERATING LICENSE NO. DPR-51

DOCKET NO. 50-313

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
117	117
117a	117a
118	118
126	126
127	127
128	128
129	129
129a	129a
141	141
146a	146a

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The ANO-1 plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 An individual with an active Senior Reactor Operator (SRO) license shall be designated as responsible for the control room command function while the unit is above the Cold Shutdown condition. With the unit not above the Cold Shutdown condition, an individual with an active SRO license or Reactor Operator license shall be designated as responsible for the control room command function.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements including the unit specific titles of those personnel fulfilling its responsibilities of the positions delineated in these Technical Specifications shall be documented in the Safety Analysis Report (SAR).

b. The ANO-1 plant manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. A specified corporate executive shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety. The specified corporate executive shall be documented in the SAR.

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

UNIT STAFF

6.2.2 The operations manager or the assistant operations manager shall hold a senior reactor operator license. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.

6.2.2.1 Administrative controls shall be established to limit the amount of overtime worked by plant staff performing safety-related functions. These administrative controls shall be in accordance with the guidance provided by the NRC Policy Statement on working hours (Generic Letter 82-12).

6.3. FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable position, except for the designated radiation protection manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

6.4 DELETED

6.5 DELETED

Table 6.2-1

ARKANSAS NUCLEAR ONE

MINIMUM SHIFT CREW COMPOSITION #

UNIT 1

LICENSE CATEGORY	ABOVE COLD SHUTDOWN	COLD AND REFUELING SHUTDOWNS
SOL	2	1*
OL	2	1
NON-LICENSED	3	1

*Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising refueling operations after the initial fuel loading.

#Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1.

Additional Requirements:

1. At least one licensed Operator shall be in the control room when fuel is in the reactor.

2. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.

3. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.

4. All refueling operations after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

5. When the unit is above the Cold Shutdown condition, an individual shall provide advisory technical support for the unit operations shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

6.6 DELETED

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

a. The facility shall be placed in at least hot shutdown within one hour.

b. The Nuclear Regulatory Commission shall be notified pursuant to 10 CFR 50.72 and a report submitted pursuant to the requirements of 10 CFR 50.36 and Specification 6.6.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.

b. Refueling operations.

c. Surveillance and test activities of safety related equipment.

d. (Deleted)

e. (Deleted)

f. Fire Protection Program Implementation.

g. New and spent fuel storage.

h. Offsite Dose Calculation Manual and Process Control Program implementation at the site.

i. Post accident sampling (includes sampling of reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and the containment atmosphere).

6.8.2 (Deleted)

6.8.3 (Deleted)

6.8.4 The Reactor Building Leakage Rate Testing Program shall be established, implemented, and maintained:

A program shall be established to implement the leakage rate testing of the reactor building as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The peak calculated reactor building internal pressure for the design basis loss of coolant accident, P_a, is 54 psig.

The maximum allowable reactor building leakage rate, L_a, shall be 0.20% of containment air weight per day at P_a.

Reactor building leakage rate acceptance criteria is $\leq 1.0\ L_a$. During the first unit startup following each test performed in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60\ L_a$ for the Type B and Type C tests and $\leq 0.75\ L_a$ for Type A tests.

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Reactor Building Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the Reactor Building Leakage Rate Testing Program.

6.9 DELETED

6.10 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.11 HIGH RADIATION AREA

6.11.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10CFR20, each high radiation area (as defined in 20.202(b)(3) of 10CFR20) in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and shall be controlled by requiring the issuance of a radiation work permit. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a pre-set integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation work permit.

6.11.2 The requirements of 6.11.1 above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and access to these areas shall be maintained under the administrative control of the shift supervisor on duty and/or the designated radiation protection manager.

The dose assignments to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

6.12.2.3 Monthly Operating Report

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis by the 15th of each month following the calendar month covered by the report.

6.12.2.4 Annual Report

All challenges to the pressurizer electromatic relief valve (ERV) and pressurizer safety valves shall be reported annually.

6.12.2.5 Annual Radiological Environmental Operating Report *

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

6.12.2.6 Radioactive Effluent Release Report **

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

* A single submittal may be made for ANO. The submittal should combine those sections that are common to both units.

** A single submittal may be made for ANO. The submittal should combine those sections that are common to both units. The submittal shall specify the releases of radioactive material from each unit.

6.12.5 Special Reports

Special reports shall be submitted to the Administrator of the appropriate Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification.

a. Tendon Surveillance, Specification 4.4.2.2

b. Inoperable Containment Radiation Monitors, Specification 3.5.1, Table 3.5.1-1.

c. Deleted

d. Steam Generator Tubing Surveillance - Category C-3 Results, Specification 4.18.

e. Miscellaneous Radioactive Materials Source Leakage Tests, Specification 3.12.2.

f. Deleted

g. Deleted

h. Deleted

i. Deleted

j. Degraded Auxiliary Electrical Systems, Specification 3.7.2.H.

k. Inoperable Reactor Vessel Level Monitoring Systems, Table 3.5.1-1

l. Inoperable Hot Leg Level Measurement Systems, Table 3.5.1-1

m. Inoperable Main Steam Line Radiation Monitors, Specification 3.5.1, Table 3.5.1-1.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-368

ARKANSAS NUCLEAR ONE, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 209
License No. NPF-6

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Entergy Operations, Inc. (the licensee) dated November 24, 1998, as supplemented by letters dated February 25, 1999, and July 14, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(2) of Facility Operating License No. NPF-6 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 209 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert A Gramm

Robert A. Gramm, Chief, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: August 26, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 209

FACILITY OPERATING LICENSE NO. NPF-6

DOCKET NO. 50-368

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
6-1	6-1
6-2	6-2
6-4	6-4
6-5	6-5
6-12a	6-12a
6-13	6-13
6-14	6-14
6-16	6-16
6-22	6-22
6-23	6-23
6-24	6-24

6.1 RESPONSIBILITY

6.1.1 The ANO-2 plant manager ANO shall be responsible for overall unit operations and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 An individual with an active Senior Reactor Operator (SRO) license shall be designated as responsible for the control room command function while the unit is in MODE 1, 2, 3, or 4. With the unit not in MODE 1, 2, 3, or 4, an individual with an active SRO license or Reactor Operator license shall be designated as responsible for the control room command function.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements including the unit specific titles of those personnel fulfilling its responsibilities of the positions delineated in these Technical Specifications shall be documented in the Safety Analysis Report (SAR).

b. The ANO-2 plant manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. A specified corporate executive shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety. The specified corporate executive shall be documented in the SAR.

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 UNIT STAFF

a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.

b. At least one licensed Operator shall be in the control room when fuel is in the reactor.

c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.

d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.

e. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

f. In MODES 1, 2, 3, or 4, an individual shall provide advisory technical support for the unit operations shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy on Engineering Expertise on Shift.

g. Administrative control shall be established to limit the amount of overtime worked by plant staff performing safety-related functions These administrative controls shall be in accordance with the guidance provided by the NRC Policy Statement on working hours (Generic Letter No. 82-12).

h. The operations manager or the assistant operations manager shall hold a senior reactor operator license.

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION#

LICENSE CATEGORY	APPLICABLE MODES	
	1, 2, 3, & 4	5 & 6
SOL	2	1*
OL	2	1
Non-Licensed	3	1

*Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising CORE ALTERATIONS.

#Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the designated radiation protection manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975

6.4 DELETED

6.5 DELETED

6.6 DELETED

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

a. The unit shall be placed in at least HOT STANDBY within one hour.
b. The Vice President, Operations ANO and the SRC shall be notified within 24 hours.
c. The Nuclear Regulatory Commission shall be notified pursuant to 10CFR50.72 and a report submitted pursuant to the requirements of 10CFR50.36 and Specification 6.6.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
b. Refueling operations.
c. Surveillance and test activities of safety related equipment.
d. (Deleted)
e. (Deleted)
f. Fire Protection Program implementation.
g. Modification of Core Protection Calculator (CPC) Addressable Constants. These procedures should include provisions to assure that sufficient margin is maintained in CPC Type I addressable constants to avoid excessive operator interaction with the CPCs during reactor operation.

NOTE: Modifications to the CPC software (including changes of algorithms and fuel cycle specific data) shall be performed in accordance with the most recent version of "CPC Protection Algorithm Software Change Procedure," CEN-39(A)-P that has been determined to be applicable to the facility. Additions or deletions to CPC addressable constants or changes to addressable constant software limit values shall not be implemented without prior NRC approval.

h. New and spent fuel storage.
i. ODCM and PCP implementation.
j. Post accident sampling (includes sampling of reactor coolant, radioactive iodines and particulates in plant gaseous effluent, and the containment atmosphere).

6.8.2 Deleted

6.8.3 Deleted

6.8.4 The following programs shall be established, implemented, and maintained:

a. Radioactive Effluent Controls Program

This program conforms with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

1) Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2;

3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;

4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS, conforming to 10 CFR 50, Appendix I;

5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;

6) Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;

7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary conforming to the dose associated with 10 CFR 20, Appendix B, Table II, Column 1;

starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORT

6.9.1.6 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Administrator of the Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

a. ECCS Actuation, Specifications 3.5.2 and 3.5.3.

b. Deleted

c. Deleted

d. Deleted

e. Deleted

f. Deleted

g. Deleted

6.10 DELETED

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 (DELETED)

6.12.2 (DELETED)

6.13 HIGH RADIATION AREA

6.13.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area (as defined in 20.202(b)(3) of 10 CFR 20) in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring the issuance of a radiation work permit. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation work permit.

6.13.2 The requirements of 6.13.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and access to these areas shall be maintained under the administrative control of the shift supervisor on duty and/or the designated radiation protection manager.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 198 TO

FACILITY OPERATING LICENSE NO. DPR-51 AND

AMENDMENT NO. 209 TO FACILITY OPERATING LICENSE NO. NPF-6

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT NOS. 1 AND 2

DOCKET NOS. 50-313 AND 50-368

1.0 INTRODUCTION

By letter dated November 24, 1998, as supplemented by letters dated February 25 and July 14, 1999, Entergy Operations, Inc. (EOI, the licensee), submitted a request for changes to the Arkansas Nuclear One, Units 1 and 2 (ANO-1, ANO-2), Technical Specifications (TSs). The proposed changes would implement changes included in the consolidated Entergy Operations Quality Assurance Plan Manual (QAPM), which was approved by the NRC on November 6, 1998. The proposed changes also clarify the responsibilities of the shift technical advisor position on shift, simplify the contents of the monthly operating report description, complete the relocation of fire protection requirements from the TSs to the fire protection program, and replace position titles with descriptions of functional responsibility. The licensee provided additional information on February 25 and July 14, 1999, that provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

2.1 ANO-1 and ANO-2 TS 6.1.1

TS 6.1.1 is changed to show that the ANO-1 and ANO-2 plant managers are responsible for the overall unit operation rather than the Vice President, Operations, as previously stated. The licensee has stated that the ANO plant manager responsibilities most closely resemble the responsibilities stated in improved Standard Technical Specifications (ISTS), Babcock and Wilcox Plants, NUREG-1430, Revision 1 (NUREG-1430), and Standard Technical Specifications, Combustion Engineering Plants, NUREG-1432, Revision 1 (NUREG-1432), as modified by TS Task Force (TSTF)-65 as approved by the staff on December 3, 1997. Consistent with the staff's approval of TSTF-65, compliance details relating to the plant-specific management position titles fulfilling the duties of the generic positions will be defined, established, documented, and updated in a plant controlled document such as the Updated Final Safety Analysis Report. Further, ANO-1 and ANO-2 TS 6.3.1 requires, in part, that "...each member of the facility staff shall meet or exceed the minimum qualifications of ANSI [American National Standards Institute] N18.1-1971 for comparable position...." Use of ANSI N18.1-1971 meets the requirements of Title 10 of the Code of Federal Regulations (10 CFR) Part 50,

Appendix B, as referenced in the staff's Safety Evaluation of November 6, 1998, approving the quality assurance program consolidation for four Entergy sites, including ANO. Therefore, the proposed change is acceptable.

2.2 ANO-1 and ANO-2 TS 6.1.2

TS 6.1.2 has been added to the TSs for both units. It specifies that an individual with an active Senior Reactor Operator (SRO) License be responsible for the control room command function while the unit is above cold shutdown. At cold shutdown, this responsibility could be assumed by an individual holding an active RO license as well.

Section 50.54(l) of 10 CFR requires the licensee to designate individuals to be responsible for directing the activities of licensed operators. These individuals shall be licensed as senior operators pursuant to 10 CFR Part 55. Section 50.54(m)(2)(ii) requires that each licensee have at its site a person holding a SRO for all fueled units at the site who is assigned responsibility for overall plant operation at all times when there is fuel in any unit. Section 50.54(m)(2)(iii) requires that when a nuclear power unit is in an operational mode other than cold shutdown or refueling, as defined by the unit's TSs, each licensee shall have a person holding an SRO for the nuclear power unit in the control room at all times. In addition to this requirement, for each fueled nuclear power unit, a licensed operator or senior operator shall be present at the controls at all times.

The proposed TS is new based on TS 5.1.2 approved by the staff in TSTF-65, Rev. 1, with the exception that TS 5.1.2 specifies a specific titled individual (Shift Supervisor) in charge of the control room. In evaluating the changes as proposed by the licensee for ANO-1 and ANO-2, the staff determined that the fact the individual in charge is holding an SRO license rather than naming a particular position to be the primary intent of the TS.

The licensee will be required to document in the Safety Analysis Report (SAR), the position responsible for the control room command function. Because the control room command function will be documented in the SAR (which is subject to 10 CFR 50.59), and the licensee must be in accordance with the requirements of 10 CFR 50.54(l), 10 CFR 50.54(m)(2)(ii), and 10 CFR 50.54(m)(2)(iii), the staff finds the proposed change acceptable.

2.3 ANO-1 and ANO-2 TS 6.2.1.a

ANO-1 and ANO-2 TS 6.2.1.a currently requires that lines of authority, responsibility, and communication shall be established and defined. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Quality Assurance Program Manual (QAPM). This specification was recommended in Generic Letter (GL) 88-06, Enclosure 1, which encourages licensees to request the removal of onsite and offsite organization charts from the TSs.

The same requirement, with minor changes is included in ISTS 5.2.1. TSTF-65, Rev. 1, revised the last sentence of ISTS 5.2.1 from "These requirements shall be documented in the [FSAR]" to read "These requirements including the plant specific titles of those personnel fulfilling the

responsibilities of the positions delineated in these Technical Specifications shall be documented in the [FSAR/QA Plan]."

EOI proposes to revise ANO-1 and ANO-2 TS 6.2.1.a to incorporate text similar to that inserted in ISTS 5.2.1 by TSTF-65, Rev. 1, and to require the delineation of these requirements in the applicable SAR. In the cover letter (November 6, 1998), to its Safety Evaluation approving the licensee's consolation of the QAPM, the staff noted the need to include certain information in the SAR for individual plants due to dislocations from the QAPM. Included is information previously relocated to the site-specific QA program descriptions. This is applicable to TS 6.2.1.a that was added to the TSs during the removal of the organization charts from the TSs, which was encouraged by the staff in GL 88-06, "Removal of Organization Charts from Technical Specification Administrative Control Requirements." Therefore, the proposed changes to TS 6.2.1.a are acceptable.

2.4 ANO-1 and ANO-2 TS 6.2.1.b

In TS 6.2.1.b, the individual identified as responsible for overall safe operation of the plant has been changed from the "General Manager, Plant Operations," to "plant manager." ANSI N18.1-1971, Section 3.2.1, defines the functional level of manager as those to which are assigned the broad responsibilities for direction of major aspects of a nuclear power plant. This functional level generally includes the plant manager (plant superintendent other title), line assistants, if any, and the principal members of the operating organization reporting directly to the plant manager and having overall responsibility for operation of the plant or for its maintenance or technical services activities. TSTF-65, Rev. 1, in accepting the use of the title "plant manager" stated that the title should agree with the ANSI standard and that the relationship between the titles in the ANSI standard and the titles used by the licensee should be described in the FSAR or QA plan. In the ANO organizational structure, the licensee has identified that the Unit 1 Plant Manager and the Unit 2 Plant Manager are currently the titled positions whose responsibilities most closely resemble the responsibilities defined in TS 6.2.1.b. The functional position is described in the licensee's QAPM. The staff finds the proposed change to be acceptable.

2.5 ANO-1 and ANO-2 TS 6.2.1.c

In TS 6.2.1.c, the individual identified as responsible for overall plant safety has been changed from "The Vice President, Operations ANO" to "A specified corporate executive." TSTF-65, Rev. 1, approved the use of generic personnel titles with the statement that the title should agree with the ANSI standard and that the relationship between the titles in the ANSI standard and the titles used by the licensee should be described in the FSAR or QA plan. The functional position is described in the licensee's QAPM. The staff finds the proposed change to be acceptable.

2.6 ANO-1 and ANO-2 TS 6.2.2

An administrative change has been incorporated in the title for ANO-1 and ANO-2. Reference to "facility" has been revised to "unit." This change is proposed for consistency with the existing ANO site in that the ANO facility consists of two units and individual TSs apply to the respective units.

2.7 ANO-1 TS 6.2.2 and ANO-2 TS 6.2.2.h

ANO-1 TS 6.2.2 and ANO-2 TS 6.2.2.h currently require that the Manager, Operations and Shift Supervisor, hold an SRO license. The licensee has proposed that the operations manager or the assistant operations manager hold an SRO license. Designation of the assistant operations manager assures that the direct line of authority for plant operations is retained. The functional level of manager is described in ANSI N18.1-1971, Section 3.2.1. Section 50.54(l) requires licensees to designate individuals to be responsible for directing the licensed activities of licensed operators and that the individuals be licensed as SROs pursuant to 10 CFR Part 55. In addition, the licensee has added a new TS (TS 6.1.2) requiring an SRO to be responsible for the control room command function. The proposed change to TS 6.2.2 (ANO-1) and 6.2.2.h (ANO-2) in concert with the combination of 10 CFR 50.54(l) and the new TS 6.1.2 will ensure that the individual with the appropriate qualifications is designated as responsible for the control room command function. The staff considers the proposed change acceptable.

2.8 ANO-1 Table 6.2-1 and ANO-2 TS 6.2.2.f and Table 6.2-1

ANO-1 and ANO-2 Table 6.2-1 currently contains requirements that the minimum shift crew composition include one Shift Technical Advisor (STA) when the unit is above cold shutdown (ANO-1) or in Mode 1, 2, 3, or 4 (ANO-2). The licensee proposes to change the tables such that the STA requirements be fulfilled either by filling a specific position or incorporating the STA requirements within those of a control room SRO.

GL 86-04, "Policy Statement on Engineering Expertise on Shift," (Policy Statement), provided the NRC's position on implementation of engineering expertise on the operations shift crews. The Policy Statement offered licensees two options for meeting the requirements for providing engineering requirements required by NUREG-0737, item I.A.1.1 and meeting the licensed operator staffing requirements of 10 CFR 50.54(m)(2).

Option 1 provided for the elimination of the separate STA position by allowing licensees to combine one of the required SRO positions with the STA position into a dual-role (SRO/STA) position. Option 2 stated that a licensee could continue to use an NRC-approved STA program while meeting licensed operator staffing requirements. Licensees were allowed to use either option on shift. In the Policy Statement, the Commission encouraged licensees to move toward the SRO/STA position with the eventual goal of the Shift Supervisor serving in the dual role.

The licensee proposed to revise the ANO-1 and ANO-2 TSs to allow the use of either option allowed by the Policy Statement. The requirement for the STA has been deleted from Table 6.2-1. The ANO-1 TS has been revised to incorporate a requirement (Table 6.2-1, Additional Requirement 5) that above the cold shutdown condition, an individual shall provide advisory technical support for the unit operations shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. Proposed Additional Requirement 5 to ANO-1 Table 6.2-1 also requires this individual to meet the qualifications specified by the Commission Policy Statement in Engineering Expertise on shift.

The ANO-2 TSs have been revised to incorporate a requirement (TS 6.2.2.f) that in Mode 1, 2, 3, or 4, an individual shall provide advisory technical support for the unit operations shift supervisor in areas of thermal hydraulics, reactor engineering, and plant analysis with regard to

safe operation of the unit. The proposed TS 6.2.2.f also requires this individual to meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on shift.

The proposed changes result in clarification, consistent with the guidance provided in the Policy Statement in that they do not imply that the STA may not be one of the SROs required by Table 6.2-1 and 10 CFR 50.54(m)(2). However, the proposed ANO-1 and ANO-2 TSs still require an individual to provide a function equivalent with the STA position of the Policy Statement. The staff finds the proposed changes acceptable.

2.9 ANO-1 TS 6.3.1

ANO-1 TS 6.3.1 currently specifies the minimum qualifications of the facility staff, the designated radiation protection manager, and the STA. The licensee proposed to delete the qualification requirements for the STA from the ANO-1 TSs. Such requirements do not exist in the ANO-2 TSs and do not meet the criteria contained in 10 CFR 50.36. The minimum qualification requirements specified for the ANO-1 TS 6.3.1 are provided in ANO-1, SAR Section 12.2.2.2.C. Since the ANO-1 SAR is maintained under the 10 CFR 50.59 process, there is adequate assurance that the requirements will continue to be maintained. The staff finds this to be acceptable.

2.10 ANO-1 and ANO-2 TS 6.4.1

ANO-1 and ANO-2 TS 6.4.1 currently specifies requirements for the retraining and replacement training program for the unit staff. The licensee has proposed deleting the requirements from the TSs but retain them within licensee-controlled documents. Inclusion of the requirements for the retraining and replacement training program in the TSs is not required to meet the criteria of 10 CFR 50.36. Section A.5 of the licensee's QAPM contains the requirement to establish, maintain, and implement training programs and Sections 12.2.2 and 13.2.2 of the ANO-1 and ANO-2 SARs, respectively, contain the description of the replacement training program. Sections 12.1.2 and 13.1.2 reference ANSI N18.1-1971 and Regulatory Guide 1.8 as the training quality standards. Since the QAPM requires the training and the SARs are controlled under 10 CFR 50.59, there is adequate assurance that the requirements for the training and replacement training program will continue to be maintained. The staff finds the proposed changes acceptable.

2.11 ANO-1 TS 6.4.2

ANO-1 TS 6.4.2 currently specifies the requirements for the maintenance of the fire brigade training program.

GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications," encouraged licensees to submit license amendments to remove fire protection requirements from the TSs in the areas of fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements along with the inclusion of fire protection audits and certain other programmatic requirements. However, the GL did not specifically address fire brigade training requirements. The licensee has proposed the removal of the fire brigade training requirements from the TSs because the ANO-1 SAR provides a detailed description of the ANO fire brigade training program. The commitment related to training meeting the requirements of Section 27 of NFPA Code-1975 presently included in TS 6.4.2 is also in Section 9D.7.2 of the

SAR. Since changes to the SAR are controlled under 10 CFR 50.59, there is adequate assurance that the requirements for the fire brigade training program will continue to be maintained. Further, the staff has concluded that including the fire brigade training in the TS is not necessary in order to meet the criteria of 10 CFR 50.36. The staff finds the proposed change acceptable.

2.12 ANO-1 and ANO-2 TS 6.6

ANO-1 and ANO-2 TS 6.6 currently specifies the reporting and review requirements for reportable events.

Section 50.73 of 10 CFR requires licensees to submit a Licensee Event Report for certain events described therein within 30 days after discovery of the event. The current ANO-1 TS 6.6.1 requirement that a reportable event is any of those conditions specified in 10 CFR 50.73 is duplicative of the regulation. The current ANO-1 TS 6.6.2.a and ANO-2 TS 6.6.1.a actions to submit a report to the Commission pursuant to the requirements of 10 CFR 50.73, is also duplicative of the regulation.

The requirements for review of each reportable event by the Plant Safety Committee (PSC) and submittal of the results of this review to the Safety Review Committee (SRC) and the Vice President, Operations ANO, specified by ANO-1 TS 6.6.2.b and ANO-2 TS 6.6.1.b are also in the EOI QAPM. QAPM Table 1, Regulatory Commitment Item C.8, clarifies the ANO commitment to Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Rev. 2. ANSI N18.7, Section 4.3.4(4), requires review by the independent review body of violations, deviations, and reportable events, which require reporting to the NRC in writing within 24 hours. The clarification in QAPM Table 1 states that in the place of the requirements of ANSI N18.7, Section 4.3.4(4), the PSC and SRC shall review facility operations to detect potential safety hazards and all reports made in accordance with 10 CFR 50.73. The Vice President, Operations ANO, serves as the chairman of the SRC. Since the EOI QAPM contains clarification that all reports made in accordance with 10 CFR 50.73 must be reviewed by the PSC and SRC, and since changes to the QAPM are controlled under 50.54(a)(3), there is adequate assurance that the requirements will continue to be maintained. Therefore, the proposed change is acceptable.

2.13 ANO-1 and ANO-2 TS 6.8.2

TS 6.8.2 currently requires that all procedures required by ANO-1 and ANO-2 TS 6.8.1.a and changes to the intent, thereto, be reviewed and approved as required by the QAPM prior to implementation and reviewed periodically as set forth in administrative procedures. The licensee proposes to delete the TS.

The EOI QAPM commits to Regulatory Guide (RG) 1.33, Rev. 2 (with two NRC-approved exceptions), which requires compliance with the requirements of ANSI N18.7-1976. Section 5.2.15 of ANSI 18.7-1976 discusses the review, approval, and control of procedures. The EOI QAPM, in Section B.14, requires that a program be established and implemented to control the development, review, approval, issue, use, and revision of documents. This section also requires the review of revisions of controlled documents for adequacy and the approval for release by the same organization that originally reviewed and approved the documents or by a designated organization that is qualified and knowledgeable.

The EOI QAPM, which has been approved by the staff, commits to Section 5.2.15 of ANSI N18.7-1976 with two exceptions. The two exceptions are: (1) that the required procedure reviews following occurrences discussed in Section 5.2.15, paragraph 3, sentence 3, are determined and controlled in accordance with QAPM Section A.6, Corrective Actions, instead of Section B.14; and (2) instead of reviewing plant procedures by an individual knowledgeable in the area affected by the procedure no less frequently than every 2 years to determine if changes are necessary or desirable, the QAPM states that controls are in effect to ensure that procedures are reviewed for possible revision upon identification of new or revised source material potentially affecting the intent of the procedures. Since the EOI QAPM commits to Section 5.2.15 of ANSI N18.7-1976 (with two staff-approved exceptions), and since changes to the QAPM are controlled under 50.54(a)(3), there is adequate assurance that the requirements will continue to be maintained. The proposed changes are acceptable.

2.14 ANO-1 and ANO-2 TS 6.8.3

The licensee has proposed to delete the current TSs that provide the requirements for the implementation of procedure changes prior to obtaining the reviews and approvals required by the current TS 6.8.2.

The EOI QAPM commits to RG 1.33, Rev. 2, which requires compliance with the requirements of ANSI N18.7-1976. Section 5.2.2 of ANSI N18.7-1976 discusses procedure adherence and methods by which temporary changes may be made to approved procedures. The EOI QAPM commits to Section 5.2.2 with two exceptions: (1) the person who holds an SRO license for the affected unit and approves a temporary change to a procedure is not required to be in charge of the shift; and (2) in addition to the temporary procedure change, described for changes that clearly did not change the intent of a procedure, temporary changes that may change the intent of a procedure may be made following the process described in Section 5.2.2, except that the person normally responsible for approving revisions to the procedure is the approval authority for the change. Since the EOI QAPM commits to Section 5.2.2 of ANSI N18.7-1976 with two staff-approved exceptions, and since changes to the QAPM are controlled under 50.54(a)(3), there is adequate assurance that the requirements will continue to be maintained. The proposed changes are acceptable.

2.15 ANO-1 TS 6.9 and ANO-2 TS 6.10

ANO-1 TS Section 6.9 and ANO-2 TS Section 6.10 currently specify requirements for the retention of records. The licensee proposes to delete these sections.

Appendix B to 10 CFR Part 50 (Section XVII) requires that "Sufficient records shall be maintained to furnish evidence of activities affecting quality. The records shall include at least the following: Operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance, and material analyses. The records shall also include closely-related data such as qualifications of personnel, procedures, and equipment. Inspection and test records shall, as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted. Records shall be identifiable and retrievable. Consistent with applicable regulatory requirements, the applicant shall establish requirements concerning record retention, such as duration, location and assigned responsibility."

Section B.15.a of the EOI QAPM requires the establishment and implementation of a program to ensure that sufficient records of items and activities are generated and maintained to reflect completed work. Records associated with design, engineering, procurement, manufacturing, construction, inspection and test, installation, preoperation, startup, operations, maintenance, modification, decommissioning, and audits are controlled under this program. Section B.15.c of the QAPM states that additional details concerning record requirements may be found in the regulatory guides and associated standards as committed to in Section A.7 and Table 1 (e.g., RG 1.88, "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records").

RG 1.88, Revision 2, October 1976, states that the requirements and guidelines for collection, storage, and maintenance of nuclear power plant quality assurance records that are included in ANSI N45.2.9-1974 are acceptable to the NRC staff and provide an adequate basis for complying with the pertinent quality assurance requirements of Appendix B to 10 CFR Part 50 with one condition that bears on documents required to be included. Section 3.2.7 of ANSI N45.2.9-1974 discusses retention of records. ANSI N45.2.9-1974 provides a list of the types of quality control records and their minimum retention periods in Appendix A. Subdivision 1.5 of ANSI N45.2.9-1974 states, "'Other documents that are required to be included as part of this standard are either identified at the point of reference or described in Section 8 of this standard.' The specific applicability or acceptability of these listed documents has been or will be covered separately in other regulatory guides or in Commission regulations where appropriate."

Since the licensee must operate in accordance with 10 CFR Appendix B and since the EOI QAPM commits to ANSI N45.2.9-1974, which is controlled under 10 CFR 50.54(a)(3), there is adequate assurance that the requirements will continue to be maintained. The proposed changes are acceptable.

2.16 ANO-1 TS 6.11.2 and ANO-2 TS 6.13.2

ANO-1 TS 6.11.2 and ANO-2 TS 6.13.2 currently require that access to locked high radiation levels, in which the intensity of radiation is greater than 1000 mrem/hr, shall be maintained under the administrative control of the Shift Supervisor on duty and/or the designated radiation protection manager. EOI proposes to replace the reference to the specific titled position of "Shift Supervisor" with a more generic functional description of "shift supervisor." The proposed ANO-1 and ANO-2 TSs still require individuals to maintain administrative control over access into locked high radiation areas. In the Safety Evaluation dated June 21, 1989, supporting ANO-1 License Amendment No. 124 and ANO-2 License Amendment No. 98, the NRC approved changes to ANO-1 TS 6.11.2 and ANO-2 TS 6.13.2 that replaced the specific title of "Health Physics Superintendent" with a reference to the functional description of "designated radiation protection manager."

ANSI N18.1-1971 (referenced in ANO-1 and ANO-2 TS 6.1.1) Section 3.2.2 defines supervisors as those persons principally responsible for directing the actions of operators, technicians, or repairmen. Those positions usually designated as intermediate and first line supervisors are included in this category. At ANO, this function is fulfilled by the Shift Superintendent or, in his/her absence, the Control Room Supervisor. The proposed changes to ANO-1 and ANO-2 TS 6.2.1.a will ensure that the titled position responsible for the shift supervisor function is delineated in the applicable unit's SAR.

Since changes to the SAR are controlled under the 10 CFR 50.59 process, there is adequate assurance that the requirements will continue to be maintained. The proposed changes are acceptable.

2.17 ANO-1 TS 6.12.2.3 and ANO-2 TS 6.9.1.6

ANO-1 TS 6.12.2.3 and ANO-2 TS 6.9.1.6 contain the requirement for the licensee to submit a Monthly Operating Report (MOR).

In GL 97-02, "Revised Contents of the Monthly Operating Report," the NRC stated that the amount of information provided in the MOR could be reduced. Specific contents of the MOR are provided in Attachment 1 to GL 97-02. The current ANO-1 description of the MOR requires the submittal of information in excess of the information requested in GL 97-02. Specifically, the current ANO-1 description requires the submittal of average daily unit power level and power reductions. Neither of these pieces of information are included in GL 97-02, Attachment 1.

In addition to a specific list of information to be supplied, the ANO-1 MOR description contains a requirement that the MOR be submitted to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the appropriate Regional Office. The ANO-2 MOR description contains a requirement that the MOR be submitted to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office. Sections 50.4(a) and 50.4(b)(1) provide requirements for the distribution of reports. Specifically, 10 CFR 50.4(b)(1) requires reports to be submitted as follows: the signed original to the Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, one copy to the appropriate Regional Office, and one copy to the NRC Resident Inspector.

The proposed changes regarding content of the MOR are consistent with the guidance in GL 97-02. In addition, 10 CFR 50.4 provides sufficient guidance to ensure proper distribution of the monthly operating report, which supercedes the TS. Therefore, the proposed changes are acceptable.

2.18 ANO-1 TSs 6.12.5.h and 6.12.5.i and ANO-2 TSs 6.9.2.e and 6.9.2.f

ANO-1 TS 6.12.5.h and ANO-2 TS 6.9.2.e currently require the submittal of special reports in the event that inoperable fire detection instrumentation is inoperable for longer than allowed by the Fire Protection Program provisions, which were removed from the TSs in accordance with GL 88-12 (ANO-1 Amendment No. 158 and ANO-2 Amendment No. 132). ANO-1 TS 6.12.5.i and ANO-2 TS 6.9.2.f currently require the submittal of special reports in the event fire suppression systems are inoperable for longer than allowed by the Fire Protection Program provisions, which were also removed from theTSs in ANO-1 Amendment No. 158 and ANO-2 Amendment No. 132. The submittal of these special reports was not required to be retained in the TSs by GL 88-12. EOI proposes to delete the requirements to submit special reports in the event fire detection instrumentation or fire suppression systems are inoperable for longer than allowed by the Fire Protection Program.

As stated in GL 88-12: "In Generic Letter 86-10, licensees were reminded of their responsibilities to report deficiencies in the Fire Protection Program which meet the criteria of 10 CFR 50.72 and 10 CFR 50.73. Other conditions which represent deficiencies of this program

and are not encompassed by the above reporting criteria should be evaluated by the licensees to determine appropriate corrective action."

The fire protection reporting requirements were not required to be retained by GL 88-12 and their removal is consistent with the objective of GL 88-12; that is to remove unnecessary fire protection TSs. In addition, deficiencies are required to be reported by 10 CFR 50.72 and 10 CFR 50.73. Therefore, the proposed TS changes are acceptable.

The licensee also informed the staff of its intent to revise certain sections of the ANO-1 and ANO-2 SARs to remove special reporting requirements related to the fire protection system operability, surveillance, and administrative requirements. No review of these changes was done bv the staff. Because the reporting requirements are in the SARs, consideration of removal must be considered by the licensee in accordance with 10 CFR 50.59.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Arkansas State official was notified of the proposed issuance of the amendment. The State official had no comment.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: G. Dick

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