Docket No. 50-368

Mr. Neil S. Carns Vice President, Operations ANO Entergy Operations, Inc. Route 3 Box 137G Russellville, Arkansas 72801

Dear Mr. Carns:

SUBJECT: ISSUANCE OF AMENDMENT NO. 121 TO FACILITY OPERATING LICENSE NO. NPF-6 - ARKANSAS NUCLEAR ONE, UNIT NO. 2 (TAC NO. 80391)

The Commission has issued the enclosed Amendment No. 121 to Facility Operating License No. NPF-6 for the Arkansas Nuclear One, Unit No. 2 (ANO-2). This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated May 9, 1991.

The amendment revises Technical Specification 3.6.3.1 on containment isolation valves. The proposed change allows exceptions to the requirements of TS 3.0.4 on mode changes, when the action statements that allow continued operation for an unlimited period of time are met.

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

Sincerely,

# **Original** signed by

Sheri R. Peterson, Project Manager Project Directorate IV-1 Division of Reactor Projects III, IV, and V Office of Nuclear Reactor Regulation

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Enclosures:

Amendment No. 121 to NPF-6

Safety Evaluation

cc w/enclosures: See next page

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### UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

July 15, 1991

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Sincerely.

Sheri R. Peterson, Project Manager

Shan R Paterson

Project Directorate IV-1

Division of Reactor Projects III. IV. and V

Office of Nuclear Reactor Regulation

Enclosures:

Amendment No. 121 to NPF-6

2. Safety Evaluation

cc w/enclosures: See next page

Mr. Neil S. Carns Entergy Operations, Inc.

cc:

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Mr. Tom Nickels Arkansas Nuclear One Route 3, Box 137G Russellville, Arkansas 72801



# UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

# ENTERGY OPERATIONS, INC.

### DOCKET NO. 50-368

## ARKANSAS NUCLEAR ONE, UNIT NO. 2

# AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 121 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 May 9, 1991, 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. <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. 121, 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.

FOR THE NUCLEAR REGULATORY COMMISSION

Theodore R. Quay, Director Project Directorate IV-1

Project Directorate IV-1 Division of Reactor Projects III, IV, and V Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: July 15, 1991

# ATTACHMENT TO LICENSE AMENDMENT NO. 121

# FACILITY OPERATING LICENSE NO. NPF-6

# **DOCKET NO. 50-368**

Revise the following page of the Appendix "A" Technical Specifications with the attached page. The revised page is identified by Amendment number and contains a vertical line indicating the area of change.

REMOVE PAGE

INSERT PAGE

3/4 6-16

3/4 6-16

#### CONTAINMENT SYSTEMS

### 3/4.6.3 CONTAINMENT ISOLATION VALVES

#### LIMITING CONDITION FOR OPERATION

3.6.3.1 The containment isolation valves specified in Table 3.6-1 shall be OPERABLE with isolation times as shown in Table 3.6-1.

APPLICABILITY: MODES 1, 2, 3 and 4.

#### ACTION:

With one or more of the isolation valve(s) specified in Table 3.6-1 inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and either:

- Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
- c. Isolate the affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- e. The provisions of Specification 3.0.4 are not applicable provided action b or c is met.

### SURVEILLANCE REQUIREMENTS

4.6.3.1.1 The isolation valves specified in Table 3.6-1 shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of a cycling test and verification of isolation time.



# UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

# SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 121 TO

FACILITY OPERATING LICENSE NO. NPF-6

ENTERGY OPERATIONS, INC.,

ARKANSAS NUCLEAR ONE, UNIT NO. 2

DOCKET NO. 50-368

### 1.0 INTRODUCTION

By letter dated May 9, 1991, Entergy Operations, Inc. (the licensee) submitted a request for changes to the Arkansas Nuclear One, Unit No. 2 (ANO-2) Technical Specifications (TS). The requested change would revise TS 3.6.3.1 on containment isolation valves. The proposed change deletes the requirements of TS 3.0.4 on mode changes, when the action statements that allow continued operation for an unlimited period of time are met. The proposed amendment is based on the recommendations provided by the staff in Generic Letter (GL) 87-09 related to the applicability of limiting conditions for operations (LCO) of TS 3.0.

# 2.0 EVALUATION

On March 31, 1991, as a follow-up to IE Information Notice 88-73, "Direction-Dependent Leak Characteristics of Containment Purge Valves," the licensee discovered that the valve body for each of the inboard containment purge isolation valves were oriented in a direction which is less likely to seal when pressurized from the containment side. These valves are currently isolated by at least one deactivated automatic valve. A Temporary Waiver of Compliance from the provisions of TS 3.0.4 for the inboard containment purge valves, noted in TS Table 3.6-1, was granted by the staff by letter dated April 10, 1991, for a duration of 120 days in order to allow the processing of a TS amendment request. The proposed TS amendment would delete the requirements of TS 3.0.4 for the containment isolation valves in TS 3.6.3.1 to allow restart from a shutdown condition should the valves be inoperable, but action statements are met that allow continued operation for an unlimited period of time.

The action required with one or more of the isolation valve(s) specified in TS Table 3.6-1 inoperable is to maintain at least one isolation valve OPERABLE in each affected penetration that is open and either:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours; or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position; or

- c. Isolate the affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

If action a, b or c is met, plant operation may continue. Currently there are no exceptions from TS 3.0.4 for this TS. The wording of ANO-2 TS 3.0.4 precludes entry into an OPERATIONAL MODE or other specified applicability condition unless the conditions of the LCO are met without reliance on provisions contained in the ACTION statements.

The application of TS 3.0.4 in this case unduly restricts ANO-2's operation when conformance with the action requirements provides an acceptable level of safety for continued operation. As a result, the licensee proposes to allow exceptions from the provisions of TS 3.0.4 as it applies to TS 3.6.3.1 provided action statements are met that allow continued operation for an unlimited period of time.

The change proposed by the licensee has been reviewed considering the limitations set forth in GL 87-09 for TS 3.0.4. GL 87-09 recognizes, in part, that Specification 3.0.4 unduly restricts facility operation when conformance to the Action Requirements provides an acceptable level of safety for continued operation in any mode. For an LCO that has Action Requirements permitting continued operation for an unlimited period of time, entry into an operational mode or other specified condition of operation should be permitted in accordance with those Action Requirements. The restriction on change in operational modes or other specified conditions should apply only where the Action Requirements establish a specified time interval in which the LCO must be met or a shutdown of the facility would be required or where entry into that operational mode would result in entry into an Action Statement with such constraints. However, nothing in the staff position stated in GL 87-09 should be interpreted as endorsing or encouraging plant startup with inoperable equipment. The GL 87-09 itself states that startup with inoperable equipment should be the exception rather than the rule.

The proposed amendment is intended to address the immediate concerns of the Temporary Waiver of Compliance issued on April 10, 1991. In addition, the staff understands that the licensee will submit a permanent TS amendment request, fully implementing GL 87-09, in order to avoid similar situations in the future. Based on review of the licensee's proposal, we find the partial exception proposed in response to GL 87-09 to be acceptable.

# 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 comments.

# 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes in surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (56 FR 27043). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

# 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: S. Peterson

Date: July 15, 1991