

June 7, 1999

Mr. C. Randy Hutchinson
Vice President, Operations ANO
Entergy Operations, Inc.
1448 S. R. 333
Russellville, AR 72801

SUBJECT: ARKANSAS NUCLEAR ONE, UNIT NO. 2 - ISSUANCE OF AMENDMENT
RE: EQUIPMENT RETURNED TO SERVICE UNDER ADMINISTRATIVE
CONTROLS TO DEMONSTRATE OPERABILITY (TAC NO. MA5207)

Dear Mr. Hutchinson:

The Commission has issued the enclosed Amendment No. 207 to Facility Operating License No. NPF-6 for the Arkansas Nuclear One, Unit No. 2. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated April 9, 1999 (2CAN049902).

The amendment modifies the TSs to add Limiting Condition for Operation 3.0.6 and its associated Bases. This change would allow equipment that has been removed from service or declared inoperable in compliance with the TS Action statement to be returned to service under administrative controls solely to perform testing required to demonstrate its operability or the operability of other equipment. The proposed change is consistent with NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants." TS 3.0.2 is also modified to reflect that TS 3.0.6 is an exception to TS 3.0.2.

The licensee's April 9, 1999 (2CAN049902), submittal included two site-specific examples associated with the proposed use of TS 3.0.6. The staff has taken exception to portions of both examples. The staff has provided its interpretation of the appropriate use of TS 3.0.6 for these two site-specific examples in its related Safety Evaluation enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

[Handwritten signature]

ORIG. SIGNED BY

M. Christopher Nolan, Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-368

Enclosures: 1. Amendment No. 207 to NPF-6
2. Safety Evaluation

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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,

M. Christopher Nolan, Project Manager, Section 1
 Project Directorate IV & Decommissioning
 Division of Licensing Project Management
 Office of Nuclear Reactor Regulation

Docket No. 50-368
 Enclosures:

1. Amendment No. _____ to NPF-6
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 7, 1999

Mr. C. Randy Hutchinson
Vice President, Operations ANO
Entergy Operations, Inc.
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Russellville, AR 72801

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Sincerely,

A handwritten signature in black ink, appearing to read "M. Christopher Nolan".

M. Christopher Nolan, Project Manager, Section 1
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-368

Enclosures: 1. Amendment No. 207 to NPF-6
2. Safety Evaluation

cc w/encls: See next page

Arkansas Nuclear One, Unit 2

cc:

Executive Vice President
& Chief Operating Officer
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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. 207
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 April 9, 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.

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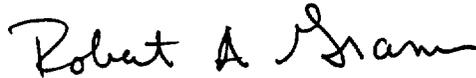
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(2) of Facility Operating License No. NPF-6 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through amendment No. 207, 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 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



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: June 7, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 207

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

3/4 0-1
B 3/4 0-1d
B 3/4 0-2

Insert

3/4 0-1
B 3/4 0-1d
b 3/4 0-2

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each specification.

3.0.2 Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the specification, except as provided in Specification 3.0.6. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.

3.0.3 In the event a Limiting Condition for Operation and/or associated ACTION requirements cannot be satisfied because of circumstances in excess of those addressed in the specification within 1 hour, action shall be initiated to place the unit in a mode in which the specification does not apply by placing it, as applicable, in at least HOT STANDBY within 6 hours, in at least HOT SHUTDOWN within the next 6 hours, and in at least COLD SHUTDOWN within the following 24 hours unless corrective measures are completed that permit operation under the permissible ACTION statements for the specified time interval as measured from initial discovery or until the reactor is placed in a MODE in which the specification is not applicable. Exceptions to these requirements shall be stated in the individual specification.

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made when the conditions of the Limiting Condition for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL MODE or other specified condition may be made in accordance with ACTION requirement when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual specifications.

3.0.5 When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied within 2 hours, action shall be initiated to place the unit in a MODE in which the applicable Limiting Condition for Operation does not apply by placing it, as applicable, in at least HOT STANDBY within 6 hours, in at least HOT SHUTDOWN within the next 6 hours, and in at least COLD SHUTDOWN within the following 24 hours. This specification is not applicable in MODES 5 or 6.

3.0.6 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

APPLICABILITY

BASES (continued)

emergency diesel generator instead, provided the other specified conditions are satisfied. In this case, this would mean that the corresponding normal power source must be OPERABLE, and all redundant systems, subsystems, trains, components, and devices must be OPERABLE, or otherwise satisfy Specification 3.0.5 (i.e., be capable of performing their design function and have at least one normal or one emergency power source OPERABLE). If they are not satisfied, action is required in accordance with this specification.

As a further example, Specification 3.8.1.1 requires in part that two physically independent circuits between the offsite transmission network and the onsite Class IE distribution system be OPERABLE. The ACTION statement provides a 24 hour out-of-service time when both required offsite circuits are not OPERABLE. If the definition of OPERABLE were applied without consideration of Specification 3.0.5, all systems, subsystems, trains, components and devices supplied by the inoperable normal power sources, both of the offsite circuits, would also be inoperable. This would dictate invoking the applicable ACTION statements for each of the applicable LCOs. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to be consistent with the ACTION statement for the inoperable normal power sources instead, provided the other specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as need be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in the other division must be OPERABLE, or likewise satisfy Specification 3.0.5 (i.e., be capable of performing their design functions and have an emergency power source OPERABLE). In other words, both emergency power sources must be OPERABLE and all redundant systems, subsystems, trains, components and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, action is required in accordance with this specification.

In MODES 5 OR 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

3.0.6 This LCO establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable ACTIONS) to allow the performance of Surveillance Requirements (SRs) to demonstrate:

- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with ACTIONS and must be reopened to perform the SRs.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent

APPLICABILITY

BASES (Continued)

the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system.

4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10CFR 50.36(c)(3):

"Surveillance Requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

4.0.1 establishes the requirement that surveillances must be performed during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a mode or other specified condition for which the associated Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL MODE for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance intervals.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 207 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 April 9, 1999 (2CAN049902), Entergy Operations, Inc. (the licensee), submitted a request for changes to the Arkansas Nuclear One, Unit No. 2 (ANO-2), Technical Specifications (TSs). The requested changes would modify the TSs to add Limiting Condition for Operation (LCO) 3.0.6 and its associated Bases. This change would allow equipment that has been removed from service or declared inoperable in compliance with the TS Action statement to be returned to service under administrative controls solely to perform testing required to demonstrate its operability or the operability of other equipment. The proposed change is consistent with TS 3.0.5 as discussed in NUREG-1432, Revision 1, "Standard Technical Specifications for Combustion Engineering Plants." TS 3.0.2 would also be modified to reflect that TS 3.0.6 is an exception to TS 3.0.2.

2.0 EVALUATION

Technical Specification 3.0.2 states that upon discovery of a failure to meet an LCO (i.e., equipment is inoperable), the required Actions of the LCO shall be met. TS 3.0.6 provides an exception for instances where restoration of the inoperable equipment to an operable status could not be performed while continuing to comply with the required Actions for an LCO. Many LCO Actions require an inoperable component to be removed from service and an exception to these Actions is necessary to allow performance of surveillance requirements (SRs) to either demonstrate the operability of equipment being returned to service or to demonstrate the operability of other equipment. The LCO for the proposed TS 3.0.6 reads as follows:

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

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LCO 3.0.6 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with Actions. The sole purpose of this specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable required Action(s)) to allow the performance of SRs to demonstrate:

- a. The operability of the equipment being returned to service; or
- b. The operability of other equipment.

The administrative controls ensure that the time the equipment is returned to service in conflict with the requirements of the Actions is limited to the time absolutely necessary to perform the allowed SRs. This specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the operability of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with required Actions and must be reopened to perform the SRs.

An example of demonstrating the operability of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the operability of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system.

The licensee's April 9, 1999 (2CAN049902), submittal included two site-specific examples associated with the proposed use of TS 3.0.6. The first such example discussed the operation of the reactor protective system (RPS) when demonstrating the operability of other equipment. The ANO-2 excore nuclear instrumentation includes four safety channels. Each safety channel utilizes a fission chamber assembly made up of three detectors that are used to measure flux in the upper, middle, and lower regions of the core independently. Each detector feeds a linear amplifier that provides input to the RPS core protection calculator (CPC) trips for local power density (LPD) — high and departure from nucleate boiling ratio (DNBR) — low. Outputs of the three linear amplifiers (per channel) are also provided to a summer that averages the signals and provides input to the linear power level — high trip. The center detector also inputs to the log power circuitry that inputs to the logarithmic power — high trip. ANO-2 TS Table 3.3-1, "Reactor Protective Instrumentation," requires that three of four channels of the linear power level — high, LPD — high, and DNBR — low, and CPC functions per operable in Modes 1 and 2, and that three of four channels of the logarithmic power level — high function be operable in Mode 2 and in Modes 3, 4, and 5 when the protective system trip breakers are closed, and the control element assembly (CEA) drive system is capable of CEA movement.

Technical Specification Table 3.3-1, Action 2 states, "With the number of channels OPERABLE one less than the Total Number of Channels, operation in the applicable MODES may continue provided the inoperable channel is placed in the bypassed or tripped condition within 1 hour. If the inoperable channel is bypassed for greater than 48 hours, the desirability of maintaining this channel in the bypassed condition shall be reviewed at the next regularly scheduled PSC [Plant Safety Committee] meeting in accordance with the QA [Quality Assurance] Manual Operations.

The channel shall be returned to OPERABLE status prior to startup following the next COLD SHUTDOWN." The normal RPS trip configuration is such that 2-out-of-4 channels must actuate to initiate the protective function. Amendment No. 159 to the ANO-2 license changed the coincidence logic design requirement for the RPS to a 2-out-of-3 logic arrangement and approved the revision to TS Table 3.3-1, Action 2, which allowed for the indefinite bypass of one channel. In order to perform surveillance testing with a channel in indefinite bypass, the inoperable channel shall be placed in trip and the channel selected for testing shall be placed in bypass. This condition would result in a 1-out-of-2 coincidence logic for the RPS. The licensee proposed the use of TS 3.0.6 in this scenario to return the inoperable channel to service rather than placing the channel in trip. This would have the effect of changing the coincidence logic from 1-out-of-2 to a 2-out-of-2 arrangement. The licensee indicated that this action would be taken to reduce the likelihood of an inadvertent reactor trip. The NRC staff disagrees with the licensee's interpretation of this proposed application of TS 3.0.6. In this scenario, the purpose of returning the inoperable channel to service is other than the demonstration of its operability. Therefore, the channel may be returned to service rather than placed in the tripped condition only if failure to do so would result in a plant trip or prevent successful completion of the SR when testing the channel in bypass.

The second example provided by the licensee discussed the restoration of a service water (SW) pump to demonstrate its operability. For this scenario, TS 3.7.3.1, "Service Water System," provides the associated LCO, Actions, and SRs for this system and its components. TS 3.0.6 can be used to demonstrate the operability of the equipment being returned to service when failure to do so would result in the entry to TS 3.0.3.

The LCO for TS 3.0.6 is necessary to establish an allowance that is not formally recognized in the current TSs for ANO-2. Without this allowance, certain components could not be restored to Operable status and a station shutdown would ensue. It is not the intent or desire that the TSs preclude the return to service of a component to confirm its operability. This allowance is deemed to represent a more stable, safe manner for operation than requiring a station shutdown to complete the restoration and confirmatory testing of plant equipment. The time during which the equipment is returned to service is very small, therefore, the potential for an accident during that time period is also very small and can be considered to be insignificant. In addition, the staff has determined that the licensee's proposal is consistent with the guidance provided in NUREG-1432, Revision 1, "Standard Technical Specifications for Combustion Engineering Plants." Therefore, the proposed changes to TS 3.0.2, TS 3.0.6, and the associated Bases for TS 3.0.6 are 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. 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 (64 FR 24196, May 5, 1999). 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: Chris Nolan

Date: June 7, 1999