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January 15, 1980

WILLIAM CAVANAUGH III
Vice President
Generation & Construction

1-010-17

Director of Nuclear Reactor Regulation
ATTN: Mr. R. W. Reid, Chief
Operating Reactor Branch #4
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Arkansas Nuclear One-Unit 1
Docket No. 50-313
License No. DPR-51
Emergency Feedwater
Control System
(File: 1510.1)

Gentlemen:

In our letters of October 31, 1979, and December 18, 1979, Arkansas Power & Light Company has proposed a design modification for initiation and control of emergency feedwater independent of the Integrated Control System. This proposed modification was intended to meet our May 17 Order requirement to upgrade the timeliness and reliability of the emergency feedwater system and to exceed the requirements of Item 2.1.7.a of NUREG-0578. In following the directive given in NUREG-0578 our letters asked for your approval of our conceptual design as soon as possible to allow incorporation of this modification during the January 1980 shutdown for Arkansas Nuclear One-Unit 1 (ANO-1).

We have proceeded with the design change engineering and procurement of hardware in a timely fashion, and were prepared to incorporate this modification during the current shutdown. We were recently informed by your staff that approval of the design would not be feasible in sufficient time for incorporation during our January 1980 shutdown. The Confirmatory Order for Arkansas Nuclear One-Unit 1, issued on January 2, 1980, confirmed that the Item 2.1.7.a requirements were no longer necessary for plant operation after January 31, 1980.

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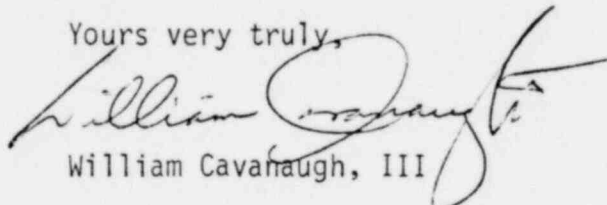
Upon hearing our current shutdown had been extended approximately one week due to low pressure turbine rotor modifications, your Mr. G. Vissing called to inquire of the possibility of installation of the Emergency Feedwater Control System prior to startup. We have evaluated the time required to make this modification given that we receive your written approval of our design no later than January 18, 1980, and incorporation of the design begins immediately. We can have the Emergency Feedwater Control System, as described in our October 31, and December 18, letters, installed by February 1, 1980. Our current shutdown schedule shows ANO-1 will return to criticality on February 1, 1980. Any delays in receiving your written approval by January 18, 1980, will have the potential for extending our shutdown or causing an additional outage of approximately three weeks.

To further facilitate your review and approval of our design and obtain your written approval in an expedited manner, we have proposed to meet with your staff on Friday, January 18, 1980, and discuss our design details.

We have made and will continue to make every reasonable effort to incorporate the Emergency Feedwater Control System prior to operation. However, we must have your written approval no later than January 18, 1980, to incorporate this modification during the current shutdown.

Please note the reviews done on all B&W plants in May 1979 by the Bulletins and Orders Task Force has caused the incorporation of modifications which meet the intent of Item 2.1.7.a. Specifically, we fully meet all seven short-term requirements except that of testability. The design of this system is such that complete testing can only be performed during shutdown but is being tested at every available occasion. Should your review of our proposed design proceed past January 18, 1980, we propose to direct our efforts at installation of the safety-grade requirements by January 1, 1981.

Yours very truly,



William Cavanaugh, III

WC:nak