AEC DISTRIBUTION FOR PART 50 DOCKET MATERIAL
(TEMPORARY FORM)

CONTROL NO: 12159

FILE:

FROM: Arkansas Power & Light Co. Little Rock, Ark. 72203 Arch. J. Pettit	DATE OF DOC 11-27-74	DATE REC'D 12-2-74		LTR X	TWX	RPT	OTHER
TO: Mr. A. Giambusso	ORIG 1 signed	CC 39	OTHER	SENT AEC PDR XX SENT LOCAL PDR XX			
CLASS / UNCLASS XXX / PROP INFO	INPUT	NO CYS REC'D 40		DOCKET NO: 50-313			

DESCRIPTION: Ltr re our 10-15-74 ltr... furnishing comments on change to Tech Specs - for Ark. Nuclear One Unit 1 & trans the following:

ENCLOSURES: Specific Comments on Reg. Guide 1.16, Rev. 2, 9/74.....

(40 cys encl rec'd)

ACKNOWLEDGED
Do Not Remove

PLANT NAME: Ark. 1

FOR ACTION INFORMATION DHL 12-2-74

BUTLER (L)	SCHWENCER (L)	✓ ZIEMANN (L)	REGAN (E)
W/ Copies	W/ Copies	W/ 6 Copies	W/ Copies
CLARK (L)	STOLZ (L)	DICKER (E)	LEAR (L)
W/ Copies	W/ Copies	W/ Copies	W/ Copies
PARR (L)	VASSALLO (L)	KNIGHTON (E)	
W/ Copies	W/ Copies	W/ Copies	W/ Copies
KNIEL (L)	PURPLE (L)	YOUNGBLOOD (E)	
W/ Copies	W/ Copies	W/ Copies	W/ Copies

INTERNAL DISTRIBUTION

✓ REG FILE	TECH REVIEW	DENTON	LIC ASST	A/T IND
✓ AEC PDR		GRIMES		BRAITMAN
✓ OGC, ROOM P-506A	SCHROEDER	GAMMILL	✓ DIGGS (L)	SALTZMAN
✓ MUNTZING STAFF	MACCARY	KASTNER	GEARIN (L)	B. HURT
CASE	KNIGHT	BALLARD	GOULBOURNE (L)	
GIAMBUSSO	PAWLICKI	SPANGLER	KREUTZER (E)	PLANS
BOYD	SHAO		LEE (L)	MCDONALD
MOORE (L) (BWR)	STELLO	ENVIRO	MAIGRET (L)	CHAPMAN
✓ DEYOUNG (L) (PWR)	HOUSTON	MULLER	REED (E)	✓ DUBE [redacted]
SKOVHOLT (L)	NOVAK	DICKER	SERVICE (L)	✓ E. COUPE
✓ GOLLER (L)	ROSS	KNIGHTON	SHEPPARD (L)	
P. COLLINS	IPPOLITO	YOUNGBLOOD	SLATER (E)	D. THOMPSON (2)
DENISE	TEDESCO	REGAN	SMITH (L)	KLECKER
REG OPR	LONG	✓ PROJECT LDR	TEETS (L)	EISENHUT
✓ FILE & REGION (2)	LAINAS	MIRAGLIA	WILLIAMS (E)	✓ Schemel
MORRIS	BENAROYA	HARLESS	WILSON (L)	
STEELE	VOLLMER			

EXTERNAL DISTRIBUTION Appl. Rc

8004180569

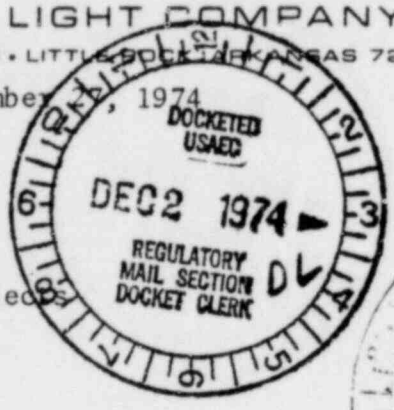
✓ - LOCAL PDR Russellville, Ark.	- NATIONAL LABS	1 - PDR SAN LA NY
✓ - TIC (ABERNATHY) (1)(2)(10)	1 - ASLBP E W Bldg Rm 529	1 - BROOKHAVEN NAT LAB
✓ - NSIC (BUCHANAN)	1 - W. PENNINGTON, Rm E-201 GT	1 - G. ULRIKSON, ORNL
1 - ASLB	1 - B&M SWINEBROAD, Rm E-201 GT	1 - AGMED (RUTH GUSSMAN) Rm B-127 GT
1 - Newton Anderson	- CONSULTANTS	1 - R. D. MUELLER
✓ 16 - ACRS XXXXXXXX SENT TO LIC. ASST. R. DIGGS 12-2-74		

Regulatory File Cy.

HELPING BUILD ARKANSAS

ARKANSAS POWER & LIGHT COMPANY
9TH & LOUISIANA STREETS • LITTLE ROCK, ARKANSAS 72203 • (501) 372-4311

November [illegible], 1974



Mr. A. Giambusso
Deputy Director for Reactor Projects
Directorate of Licensing
Office of Regulation
U. S. Atomic Energy Commission
Washington, D. C. 20545

SUBJECT: ARKANSAS POWER & LIGHT COMPANY
ARKANSAS NUCLEAR ONE - UNIT 1
DOCKET NO. 50-313
LICENSE NO. DPR-51
STANDARD TECHNICAL SPECIFICATIONS

Dear Mr. Giambusso:

Mr. Dennis L. Ziemann's letter of October 15, 1974, transmitted a copy of the standard Technical Specifications, Section 6, Administrative Controls, and requested that we submit by December 1, 1974, a proposed change to our Technical Specifications to incorporate the standard. A review of our Technical Specifications indicates that the only major difference from the standard is in the reporting requirements. The standard Technical Specifications reference Regulatory Guide 1.16, Revision 2, "Reporting of Operating Information - Appendix A Technical Specifications" which was issued on September 30, 1974. Our review of that Regulatory Guide and discussions held on November 4, 1974, in Atlanta, Georgia, with representatives of the AEC staff and other Region II utilities indicate that the guide is in need of significant revisions before it is implemented. Pursuant to Lester Rogers' letter of transmittal of September 30, 1974, we have submitted our comments on the guide. A copy of my comments are attached.

Our meeting with the AEC indicated that there would be substantial and significant comments filed on Regulatory Guide 1.16, Revision 2, and more than likely this will lead to substantial changes in it. When this fact is taken along with the fact that the standard Technical Specifications differ significantly only with regard to reporting from ANO-1's proposed Technical Specifications, we feel that we should be allowed to wait and amend our Technical Specifications in accordance with the final Regulatory Guide. We will continue to follow the developments of Regulatory Guide 1.16 and will submit proposed changes in the Technical Specifications as soon as possible after they are issued in final form.

12159

We certainly appreciate your cooperation in this matter.

Very truly yours,

Arch P Pettit

Arch P. Pettit
Senior Vice President

APP:DR:mc

Attachment

SPECIFIC COMMENTS
ON
REGULATORY GUIDE 1.16, REV. 2, 9/74

The following specific comments are referenced to paragraphs of Regulatory Guide 1.16, Revision 2, September 1974, to facilitate review:

1. Paragraph C.1.a - The statement that the startup report "should address each of the tests conducted" is too broad and vague. The scope of this report should be limited to those tests done to prove core performance, nuclear safety, etc., and those done to demonstrate specific license requirements.

2. Paragraph C.1.b - Sub-paragraphs (1) and (2) are an annual duplication of the information presented in the Monthly Operating Reports and Abnormal Occurrence Reports and could be eliminated from the Annual Report. The requirement of sub-paragraph (2) to report forced 5% reductions in power should be made consistent with the Monthly Operating Report requirement to report 20% reductions in power and should refer specifically to percentage of rated net electrical generation.

3. Paragraph C.1.b(3) - Tabulation of personnel exposures according to duty function would place an excessive paperwork and badge/dosimeter processing on plant health physics personnel. It would be more appropriate to tabulate exposures by job classification, e.g., operators, maintenance personnel, etc.

4. Paragraph C.1.b(4)(d) - This section imposes an excessive new sampling requirement and should be limited to apply only to those times when a specific percent fuel failure is present (e.g., 0.1%).

5. Paragraph C.1.b(4)(e) - The term "failed fuel" should be changed to "irradiated fuel".

6. Paragraph C.1.b - Material previously required in the semi-annual operating report on changes, tests, and experiments and FSAR changes should be included in the annual report to meet the requirements of 10CFR59 and to keep the FSAR as a living, meaningful and useful document.

7. Paragraph C.2.a(5) - The reporting requirements of this section should be made less restrictive to coincide more closely with present Technical Specification reports following unanticipated reactivity changes of more than 1% $\Delta K/K$.

8. Paragraph C.2.b - The report date for Thirty Day Written Reports should be changed to thirty days after the event to avoid short length report periods for events that occur near the end of a month.

9. Paragraph C.2.b(2) - Reporting of all conditions leading to operation between the most conservative and least conservative aspects of a

limiting condition for operation would require reporting maintenance on all safety related equipment as well as outages of equipment within Technical Specification limits. This requirement should be changed to require reporting only forced degradation of safety systems in excess of outage times defined by Technical Specifications.

10. Paragraph C.2.c - This section should not be included with the Abnormal Occurrences as these events cannot be considered as affecting the safety of the plant. Perhaps it would be more appropriate to make a new section for these items called "Items of Public Interest".

11. Paragraph C.2.c(1) - Reports of property damage to the plant in excess of $10,000 with today's high prices is unrealistic. It would be more appropriate to change this figure to $100,000.

12. Paragraph C.2.c(4) - In most cases of transport of radioactive material to or from nuclear power plants, the nuclear power plant has no responsibility since such materials are turned over to the shipper when they are offsite. This reporting requirement should thus rest on the shipper, not the nuclear power plant.

13. Paragraph C.2.c(5) - Reporting of unscheduled shutdowns in excess of one week is already covered by C.1.c, Monthly Operating Reports.

14. Appendix D - Items 12, 13, and 14 should not include time required for refueling outages in determining the hours in the reporting period. It is general knowledge that every nuclear plant is shut down each year for refueling while fossil plants are not, thus, including refueling outages in the calculation of availability and capacity factors for nuclear power plants makes these factors inappropriate for comparison to fossil plants.

15. Appendix D, Item 12 - Including only hours the reactor was critical in calculation of a reactor availability factor is inappropriate as there are many times when the reactor is available, but shut down due to balance of plant problems.