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FROM: Arkansas Power & Light Co Little Rock, Ark J D Phillips		DATE OF DOC 7-11-75	DATE REC'D 7-15-75	LTR XXX	TWX	RPT	OTHER
TO: Mr Giambusso		ORIG one signed	CC	OTHER	SENT NRC PDR <u>XX</u>		XX
CLASS UNCLASS XXXXX		PROP INFO	INPUT	NO CYS REC'D 1	SENT LOCAL PDR <u>XX</u>		
DESCRIPTION:				DOCKET NO: 50-313			

Ltr re our 5-15-75 ltr....and their 6-2-75 submittal.....trans the following:

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

ENCLOSURES:
Data covering cove rotenone surveys done in Lake Dardanelle for the years 1964 thru 1976as supplied by the arkansas fish & game commissions.....(40 cys encl rec'd)

PLANT NAME: Arkansas #1

See rpts

/ FOR ACTION/INFORMATION 7-16-75 ehf

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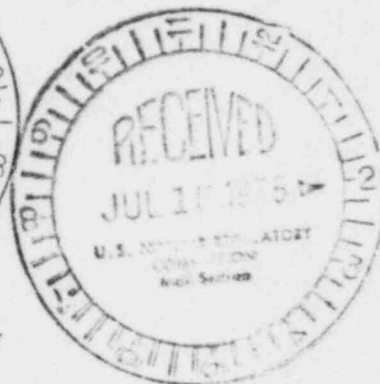
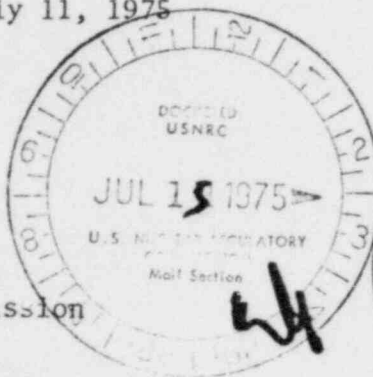
HELPING BUILD ARKANSAS

ARKANSAS POWER & LIGHT COMPANY

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July 11, 1975

Mr. A. Giambusso, Director
Division of Reactor Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Subject: Arkansas Power & Light Company
Arkansas Nuclear One-Unit 1
Docket No. 50-313
License No. DPR-51
Environmental Technical Specifications

Dear Mr. Giambusso:

Mr. Muller's letter of May 15, 1975, transmitted draft change no. 3 to the Technical Specifications of Operating License No. DPR-51. On June 2, 1975, we provided comments and made objections to certain parts of said draft Change No. 3. On June 11, 1975, we met with Mr. Muller and members of his staff to attempt to resolve our differences. This letter transmits information which we agreed to submit during that meeting and a description of revisions to draft Change No. 3 to incorporate agreements made during that meeting as we understand them.

Enclosed (Attachment 1) is data covering cove rotenone surveys done in Lake Dardanelle for the years 1964 through 1974 as supplied by the Arkansas Game and Fish Commission. The data for the period 1970 through 1974 is also provided in our semiannual operating report for the last half of 1974. Enclosed with this data is additional data covering stocking efforts in Lake Dardanelle made by the Arkansas Game and Fish Commission.

We are scheduling a meeting with Federal and local agencies previously consulted by AP&L in establishing our environmental monitoring program for the latter part of August 1975. This meeting will thus take place after one set of cove rotenone samples outlined in attached ETS 6.4. The purpose of this meeting will be to perform an overall review of the aquatic sampling programs on the Dardanelle Reservoir and their adequacy in assessing long term impacts of ANO-1 operations. The following agencies will be invited to be represented:

- Arkansas Game and Fish Commission
- Arkansas Department of Pollution Control and Ecology



U. S. Nuclear Regulatory Commission
Arkansas Polytechnic College (Buford Tatum)
University of Arkansas at Little Rock (Clarence Sinclair)
U. S. Army Corp of Engineers
U. S. Geological Survey
Bureau of Sports Fisheries and Wildlife (Al Houser)
Arkansas State Department of Health
U. S. Environmental Protection Agency

Discussions with the EPA indicate that jurisdiction regarding fish grinding operations has been delegated to the Arkansas Department of Pollution Control and Ecology (ADPC&E). ADPC&E have indicated that they have no problems with our fish grinding operations.

We are in the process of documenting specific times for temperature measurements taken in conjunction with our thermal plume mapping study. These will be compared with plant condenser water box temperature records and a correlation developed. We will inform you of our success in this effort. No schedule is now available. Our consultants performing the thermal plume mapping effort have stated after 5 operational surveys that "the survey clearly shows that the elevated temperatures in Illinois Bayou are not a result of recirculation".

The following changes and additions should be made to draft Change No. 3. Reasons for most of the changes can be found in our June 2 letter.

1. page 2-10, Specification 2.4.1.2
Change to read as follows:
"If the cumulative release of radioactive materials in liquid effluents excluding tritium and dissolved gases over a calendar quarter exceeds 2.5 curies, the Licensee shall:"
2. pages 2-17 and 2-18, Table 2-2
 - a. Item 1.b
The frequency should be changed to read simply "quarterly".
 - b. Item 1.c & 1.f
These two items are completely redundant to 1.a and should be deleted.
 - c. Item 2
This item is already covered by the appendix A Technical Specifications and does not need to be repeated here. It should be deleted and subsequent items renumbered.
 - d. Item 4.b
Two items appear with the number 4.b. They should be renumbered. For the item numbered 4.b(4) in draft Change No. 3 the frequency should read simply "quarterly composite". The item numbered 4.c(1) in draft Change No. 3 should be deleted along with its associated note (5) on the next page for reasons stated in our June 2 letter. Sensitivity for item 4.b(3)

should remain 10^{-10} $\mu\text{Ci/cc}$ since the change to 10^{-11} $\mu\text{Ci/cc}$ was based on fixed filter sampling and our system uses continuous filters. Hardware changes would be necessary to enable us to meet the 10^{-11} $\mu\text{Ci/cc}$ limit.

- e. Item 6
"Air ejector" should be deleted.
3. page 2-19, Table 2-2 Notes
The attached page 2-19 (Attachment 2) should be adopted.
4. pages 4-11 through 4-12a, Specifications 4.1.2.a(2) & (3)
The attached pages 4-11 through 4-12a (Attachment 3) should be adopted.
5. page 4-15, Specification 4.2.10
Item 4.2.10(c) should begin "one (1) sample monthly from milking animals . . ." No frequency was established in draft Change No. 3. The overall error required by draft Change No. 3 for the radioiodine analysis is $\pm 25\%$. At the present time we cannot meet this requirement. Clabbering of our milk samples limits the time allowable to put it through a column and therefore also limits the quantity that can be put through the column. We believe, and have papers supporting our belief, that preservatives such as formaldehyde or merthiolate tie up the iodine in the sample and therefore are not acceptable for use in our procedure. We are attempting to develop procedures to enable us to meet the $\pm 25\%$ limit and should we be successful will be happy to have that limit placed on us. Until such time, however, that we have convinced ourselves of our ability to meet such an error limit, the limit should be changed to $\pm 35\%$. Also, to allow for instances where residents will not sell their milk for our sampling purposes the following should be added to the bottom of page 4-15: "If milk animals are present in a location where milk cannot be obtained, a sample of the nearest grass available shall be analyzed for the isotopes stated above". Our interpretation of this specification regarding a milk animal that "dries up" is that, should this occur, no notification of the NRC is necessary since it is a periodic, frequent and temporary occurrence and that no grass sampling is necessary since no milk is being produced.
6. page 4-29, Table 4-3
The sampling frequency for the gill net survey should read "2 sets of 2 net-nights in each area within 30 days each quarter" to agree with the text. For the trawling survey and the shoreline seine survey the sampling frequency should read "2 samples in each area every other week March, April, May, June" and the sample station # should read "areas A, B, C, D".

7. page 6-3, Specification 6.3
The report date should be changed to June 1, 1975. A basis for the specification should be added to read as follows: "The information provided by this study will indicate whether modifications, if any, to current operating procedures will reduce impingement levels". In the future, we feel that all new or significantly changed technical specifications imposed by initiation by the NRC staff should be accompanied by a basis provided by the NRC staff.
8. pages 6-4 through 6-6 should be replaced by the attached page 6-4 (Attachment 4). Candidate locations for these surveys have been narrowed to eight. These will be chosen shortly. Results of the first set of these surveys will be evaluated during the above mentioned August meeting.
9. General - Unchanged backsides of changed pages will be transmitted by the NRC along with the changed pages to facilitate entry into existing ETS.

Very truly yours,



J. D. Phillips
Senior Vice President

JDP:ay