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July 30, 1980

1-070-30

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

> Subject: Arkansas Nuclear One-Unit 1 Docket No. 50-313 License No. DPR-51 Fire Protection (File: 1510, 2040)

Gentlemen:

In response to your letter of May 12, 1980, the following is provided.

You state that our basis for determining the adequacy of our existing ANO-1 Cable Spreading Room Fire Protection System is "entirely of a qualitative rationale." We submit that this is not a correct evaluation of our basis. As far as human capability and state-of-the-art technology exists, we have quantitatively complied with all applicable codes, standards, and requirements. This was addressed in detail in our previous submittals on this issue. However, your above referenced letter indicates these arguments to be unacceptable to resolve your concerns.

Our letter of March 13, 1980, provided you with concerns we have with regard to a possible degradation of safety if we were to comply with your request and stated we could not proceed with such modifications until those safety issues were addressed. Your May 12, 1980, response did not address the safety concerns.

In order to resolve this issue in a mutally acceptable manner, and in the best interest of safety, we are awaiting the outcome of the proposed Appendix R to 10CFR50. As Appendix R will address this issue in a final and legal manner, compliance with the Federal Regulation should resolve our mutual concerns with regard to adequacy and safety. Therefore, we propose to await resolution of this issue until implementation of Appendix R. We will provide whatever modifications are required to comply with the regulation, in its final and implemented form, to resolve this issue.

Very truly yours,

David C. Timela

David C. Trimble Manager, Licensing

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