ARKANSAS POWER & LIGHT COMPANY
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4422

October 20, 1980

WILLIAM CAVANAUGH III
Vice President
Generation & Construction

1-100-17
2-100-15

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

Director of Nuclear Reactor Regulation
ATTN: Mr. R. A. Clark
Operating Reactor Branch #3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket No. 50-313 and 50-368
License No. DPR-51 and NPF-6
Proposed Technical Specifications
Change - Administrative Controls
(File: 1511,1, 2-1511.1)

Gentlemen:

This letter proposes changes to Arkansas Nuclear One - Units 1 & 2 (ANO 1 & 2) Technical Specifications Section 6.0, applicable to both units. These changes are requested for the reasons discussed below.

The proposed Technical Specification change has been included in the Standardized Technical Specification (NUREG-0103, Rev. 3 and NUREG-0202, Rev. 1, dated July, 1979 and August, 1979, respectively) as an option available to licensees. Similar changes to Technical Specifications have been granted by the NRC to other licensees.

The applicable ANO 1 & 2 Technical Specification pages are included with asterisk and vertical lines noting the proposed changes. Pursuant to the requirements of 10 CFR 170.22, we have determined our amendment request to require a Class III and Class I fee as it involves

P

a single safety issue and a duplicate amendment for each unit. Accordingly, a check in the amount of $4,400 is remitted.

Very truly yours,

William Cavanaugh III

WC:GAC:lp
Attachment

STATE OF ARKANSAS)
) SS
COUNTY OF PULASKI)

William Cavanaugh III, being duly sworn, states that he is Vice President, Generation & Construction, for Arkansas Power & Light Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this Supplementary Information; that he has reviewed or caused to have reviewed all of the statements contained in such information, and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information and belief.

William Cavanaugh III

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 20 day of October 1980.

Sharon Kaye Hendrix
Notary Public

My Commission Expires:

My Commission Expires 9/1/81

BASIS FOR CHANGE

The proposed addition to the Technical Specifications will not significantly impact the public health and safety or personnel safety, nor will it adversely affect plant operation. The change will affect the method in which certain high radiation areas are controlled and will provide a more practicable method of access control of high radiation areas which are 1000 millirems per hour or less for Operations and Health Physics personnel.

Presently, all areas in which the dose rate is greater than 100 millirem per hour are controlled by appropriate posting and a locked entrance in accordance with 10 CFR 20. To insure compliance with 10 CFR 20, each entrance is inspected and verified locked a minimum of three times daily by Operations and/or Health Physics. This method of control may affect the overall safety of the plant by unduly restricting access to vital components located in areas in which the dose rates may vary from a radiation area to a high radiation area depending on the operating mode. The proposed change will amend the existing practice by requiring conspicious posting and barricading of areas in which the dose rate is greater than 100 millirem per hour but less than 1000 millirem per hour and by the implementation of stricter administrative controls. Administrative controls will replace the requirement for locked doors in these areas and will provide a less restrictive, but equally effective, method of access control for authorized personnel. Included in the administrative controls governing entry into <u>all</u> high radition areas are:

1. Authorization by RWP/SWP
2. Presence of appropriate radiation monitors, and
3. Accompaniment by a person trained in radiation protection procedures.

In the areas where the dose rate continually exceeds 1000 millirem per hour, presently used methods to control high radiation areas will remain in effect. It should also be noted that in those areas in which the dose rate is less than 1000 millirem per hour and the capability of locking the entrance presently exists, the locked entrance may be maintained. Keys to all locked entrances to high radiation area doors and barricades will be administratively controlled.

While the proposed change will reduce the requirement for locked entrances in certain areas, the overall control of high radiation areas by Health Physics will not be degraded and the potential for personnel exposure will not increase. Health Physics control of the areas will be enhanced by administrative controls, radiological protection practices (time, distance and shielding) and the direct control of keys to high radiation area doors.