



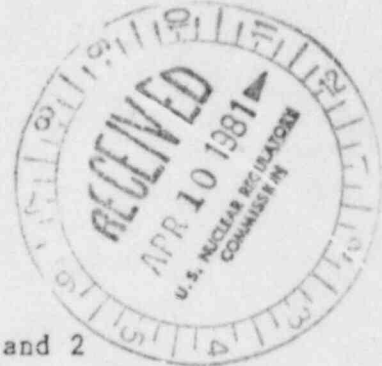
ARKANSAS POWER & LIGHT COMPANY

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April 3, 1981

GR-0481-04

Mr. Darrel G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Subject: Arkansas Nuclear One-Units 1 and 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6  
Generic Letter 81-10,  
Emergency Operations Facility  
(File 1510.3, 2-1510.3)

Gentlemen:

Your letter of February 1<sup>st</sup>, 1981 requested that we confirm the implementation dates, indicated in Enclosure 1 to your letter would be met. Following is a discussion of these requirements and our commitments relative to them.

A description of the physical facilities to meet the requirements for a technical support center (TSC), operational support center (OSC) and emergency operations facility (EOF) was contained in Mr. William Cavanaugh, III's letter, dated January 17, 1980. NRC acceptance of our plans was indicated by your letter to Mr. William Cavanaugh, III, dated April 15, 1980. By comparison to Table III.A.1.2.2-2, our facilities are of the "Option 1" type. Construction of our EOF was begun in April of 1980 at a location 0.65 miles from ANO. The protection factor provided is slightly less than 5. Ventilation isolation is provided with HEPA and charcoal filters.

With regard to the Backup EOF, the following is proposed. The Backup EOF will be located at AP&L's Russellville office. This facility is located approximately 7 miles from ANO and in a different wind direction than the EOF. This facility is presently planned to be used as the technical operation control center for state agencies. Although this proposed location is slightly less than 10 miles from ANO, we feel it is the most practical location and request that you grant relief from the specified distance requirement.

With regard to the implementation schedule for the TSC, OSC and EOF facilities, we will meet required dates of June 1, 1981 for design information and October 1, 1982 for operational facilities.

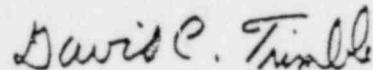
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We have reviewed the manning requirements of Table III.A.1.2-1 and feel that we can meet the implementation schedule with minor exceptions. We do not feel that the required staffing level can be reached by September 1, 1981. We will comply with the staffing requirements by July 1, 1982. In the interim period, after September 1, 1981, any deficiencies will be capable of being filled by augmentation within a reasonable amount of time. In general, we feel that the requirement for augmentation within 30 minutes is both unreasonable and unnecessary. Although such a short response time may be achieved in many cases, it is not possible to assure this response time in every instance. The augmentation specified at 30 minutes will be made as soon as possible and at least within one hour.

During the period from September 1, 1981 until July 1, 1982, the backshift in plant health physics coverage will be provided by the Waste Control Operators. Although this has been our normal practice, it was recently identified as a significant weakness in our health physics program during a special appraisal by an NRC Radiological Appraisal Team. The results of this inspection are discussed in a letter dated February 23, 1981 from K. V. Seyfrit to William Cavanaugh, III. Our response to this letter, dated March 17, 1981, indicates our disagreement with this finding. By our commitment to the staffing levels of Table III.A.1.2-1, we have committed to provide a separate health physics technician on each shift by July 1, 1982. This technician will be qualified to ANSI N18.1. In the interim we will continue to utilize the Waste Control Operator for this function on backshifts, with the capability for augmentation (after September 1, 1981) as discussed above. We feel that this should adequately resolve the concerns of the Radiological Appraisal Team and meet the requirements of item II.A.1.2.

Very truly yours,



David C. Trimble  
Manager, Licensing

DCT:nak

cc: Mr. K. V. Seyfrit, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Region IV  
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Arlington, Texas 76011