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July 2, 1981



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Director of Nuclear Reactor Regulation  
ATTN: Mr. T. M. Novak  
Division of Licensing  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

SUBJECT: Arkansas Nuclear One - Unit 1 & 2 Docket No. 50-313  
License No. DPR-51 NUREG-0737, Item I.C.1, Abnormal  
Transients Operator Guidelines  
(File: 1510.3)

Gentlemen:

In response to your June 1, 1981, letter we submit the following using numbers which correspond to the item numbers in your letter.

1. The event trees provided fail all relevant challenged systems including failures involving multiple systems. You have defined the incomplete aspects of ATOG to be that ATWS is not included. As we stated in our October 7, 1980 comments on NUREG-0737, ATWS is an unresolved issue at this time and we feel it would be inappropriate, or at least premature, to address it at this time and in this particular forum.
2. Multiple failures were qualitatively analyzed on a functional level. The basic transient code used for the computer simulation portion of the ATOG program was TRAP II. The version used for the ANO-1 guidelines had an equilibrium pressurizer model. Therefore, on transients with insurges into the pressurizer, these surge rates were used as inputs into the DYSID code (a non-equilibrium pressurizer model) and the Reactor Coolant System pressure response was obtained. The combination of these two codes was used as input in developing Part II of the guidelines. In the case of a steam line break inside the reactor building, the CONTEMPT code was used to predict building pressure response.
3. Operator errors of omission and commission are addressed in the event trees extensively. We do not understand the basis for your concern here.

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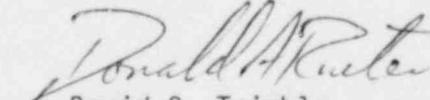
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4. a) SG tube ruptures occurring simultaneously in more than one steam generator is not currently addressed in this program. The current program has been underway for approximately two (2) years and should be complete within about six (6) months. Although it may ultimately be appropriate to address SG tube failures occurring simultaneously in more than one steam generator, it cannot presently be included within the scope of this effort without jeopardizing the schedule and progress of the program.
  - b) This is addressed in the Event Trees by the use of the branches with inadequate High Pressure Injection (HPI) flow. This includes zero flow.
  - c) See 1. above.
  - d) This is explicitly addressed in the Event Tree on Loss of Main Feedwater, Dwg. No. 1100937
5. Instructions to go to inadequate core cooling guidelines are included in the guidelines. Inadequate core cooling guidelines have been previously submitted on December 13, 1979.

As stated above, this program has been underway for approximately two (2) years, and we've learned much during its progress. In fact, except for formatting work, the effort is essentially complete. With your review still in its preliminary stages, it may be more expeditious to resolve further questions through informal meetings or information exchanges as opposed to letters such as this. Again I would like to point out that this program was initiated independently of any NRC requirements. It is complete enough and of such benefit that we feel strongly that it should proceed to completion independently of your comments at least to the extent that they would require significant effort to consider.

Very truly yours,

  
for David C. Trimble  
Manager, Licensing

DCT: DHW: kb