

MAY 10 1983

DMB 016

Dockets Nos. 50-313
and 50-368

Mr. John M. Griffin, Vice President
Nuclear Operations
Arkansas Power & Light Company
P. O. Box 551
Little Rock, Arkansas 72203

Dear Mr. Griffin:

SUBJECT: RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS (RETS)
ARKANSAS NUCLEAR ONE, UNITS 1&2

DISTRIBUTION

Docket File
NRC PDR
L PDR
ORB#4 Rdg
NSIC
EJordan
JTaylor
ACRS-10
DEisenhut
GVissing
RIngram
Gray File
EBlackwood
Hornstein

RLee
PKreutzer-3
Gray File
ORB#3 Rdg
FCongel
WGammill

This letter transmits a list, prepared by EG&G, Idaho, of unresolved issues remaining today as a result of the June 22-24, 1982 meeting and your subsequent draft submission to and discussions with EG&G.

Your recent letters indicate a concern that unless you make an extensive review of your existing radiological effluent systems/programs, the Appendix I issue could evolve into a continuing series of letter exchanges. We do not foresee this. As you can see from the attached list, very few substantive issues remain unresolved. There already has been more than enough discussion between your staff and our contractor EG&G. We now need your formal submittal so NRC staff can resolve with you any problems that remain.

Therefore, we request that you provide a final submittal of the RETS and of the ODCM and PCP within the next 30 days. For the open items on the attached list, or any others which you have identified, we request that in your submittal, if you do not follow the NRC guidance, you explain in your cover letter the basis for your position.

Should you have any questions, please contact your assigned Project Manager.

Sincerely,

Original signed by

Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

Original signed by

John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

8305170622 830510
PDR ADDCK 05000313
P PDR

Enclosure:

As Stated

OFFICE	ORB#4:DL	ORB#3:DL	C-ORB#4:DL	C-ORB#3:DL	
SURNAME	GVissing:cf	RLee	JStolz	RCClark	
DATE	See next page 5/10/83	5/10/83	5/10/83	5/10/83	

Arkansas Power & Light Company

50-313, Arkansas Nuclear One, Unit 1

cc w/enclosure(s):

Mr. John R. Marshall
Manager, Licensing
Arkansas Power & Light Company
P. O. Box 551
Little Rock, Arkansas 72203

Mr. James M. Levine
General Manager
Arkansas Nuclear One
P. O. Box 608
Russellville, Arkansas 72801

Mr. Leonard Joe Callan
U.S. Nuclear Regulatory Commission
P. O. Box 2090
Russellville, Arkansas 72801

Mr. Robert B. Borsum
Babcock & Wilcox
Nuclear Power Generation Division
Suite 220, 7910 Woodmont Avenue
Bethesda, Maryland 20814

Mr. Nicholas S. Reynolds
Debevoise & Liberman
1200 17th Street, NW
Washington, DC 20036

Honorable Ermil Grant
Acting County Judge of Pope County
Pope County Courthouse
Russellville, Arkansas 72801

Regional Radiation Representative
EPA Region VI
1201 Elm Street
Dallas, Texas 75270

Mr. John T. Collins, Regional Administrator
U. S. Nuclear Regulatory Commission, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Mr. Frank Wilson
Director, Division of Environmental
Health Protection
Arkansas Department of Health
4815 West Markham Street
Little Rock, Arkansas 72201

Mr. Charles B. Brinkman
Manager, Washington Nuclear
Operations
C-E Power Systems
7910 Woodmont Avenue
Bethesda, Maryland 20814

ANO-1 UNRESOLVED ISSUES

1. Definitions, Administrative Controls, and Figure 5.2-1 (the figure showing the unrestricted areas) were totally omitted in the second submittal.
2. The bases statement for 3.23.3 was omitted. Specification 3.23.3 is concerned with doses from iodine, tritium, and eight-day half-life particulates. This omission appears to be a typographical error.
3. Table 4.25-1, Radioactive Gaseous Waste Sampling and Analysis Program, does not contain a footnote "f" referencing table notation "f." This omission appears to be a typographical error.
4. In Table 4.25-1 the minimum analyses frequency for the gross alpha analyses should be on a "composite" particulate sample.
5. Table Notations c and g for Table 4.25-1 should be reworded to state ". . . within a one hour period unless the gross and iodine-131 failed fuel monitors and the noble gas monitor of the effected vent(s) show there has not been an increase by more than a factor of three within a four-hour period."
6. The referenc. to the administrative section in 4.25.6.1.b is incomplete. The section now reads ". . . in Specification 6.____, to assure solidification of the subsequent batches of waste."
7. In Table 4.27.1-1, Radioactive Liquid Effluent Monitoring Instrumentation Surveillance Requirements, a reference to a (1/2) footnote is used with the channel test for the liquid radwaste radiation monitor. This reference should be (1).
8. There are inconsistencies between the Radioactive Gas Effluent Monitoring Instrumentation, Table 3.5.7-1, and the surveillance table for this instrumentation as shown on the attached page.
9. The following typos should be corrected:
 - a. Table 3.5.6-1, Action A.1: 4.24.1.3 should be 4.24.1.1
 - b. Specification 3.5.72: Table 5.7-1 should be Table 3.5.7-1
 - c. Specification 3.23.3.1: 4.24.2.1 should be 4.24.3
 - d. Specification 3.23.2.1.b: 3.23.2.2a should be 3.23.2.1.a
 - e. Specification 4.24.1.1: Table 4.24.1-1 should be 4.24-1
 - f. Specification 4.25.2: 4.24.2.1 should be 4.25.2.1

Table 3.5.7-1

- Instrument
1. Waste Gas Holdup System
 - Gas activity monitor (provides alarm and automatic termination of release)
 - Effluent system flow rate measuring device

 2. Auxiliary Building Ventilation System
 - a) Gas activity monitor
 - b) Iodine Sampler
 - c) Particulate sampler
 - d) Effluent system flow rate measuring device
 - e) Sampler flowrate measuring device

 3. Spent Fuel Pool Area Ventilation System
 - a) Gas activity monitor
 - b) Iodine sampler
 - c) Particulate Sampler
 - d) Effluent system flow rate measuring device
 - e) Sampler flow rate measuring device

 4. Reactor Building Ventilation System
 - a) Gas activity monitor
 - b) Iodine sampler
 - c) Particulate sampler
 - d) Effluent system flow rate measuring device
 - e) Sampler flow rate measuring device

Table 4.27.2-1

- Instrument
1. Waste Gas Holdup System
 - a. Noble Gas Activity monitor
 - b. Iodine Sampler Cartridge
 - c. Particulate Sampler Filter
 - d. System Effluent Flow Rate Measuring Device
 - e. Sampler Flow Rate Measuring

 2. Auxiliary Building Ventilation System
 - a. Noble Gas Activity Monitor
 - b. System Effluent Flow Rate Measurement Device
 - c. Sampler Flow Rate Measurement Device

 3. Spent Fuel Pool Area Ventilation System
 - a. Gas Activity Monitor
 - b. System Effluent Flow Rate Measurement Device
 - c. Sampler Flow Rate Measurement Device

 4. Reactor Building Purge System
 - a. Gas Activity Monitor
 - b. System Effluent Flow Rate
 - c. Sampler Flow Rate Measurement Device

ANO-2 UNRESOLVED ISSUES

- 1) Definitions, Administrative Controls, and Figure 5.1-3 (the figure showing the unrestricted area) were totally omitted in this submittal.
2. Specification 4.26.1.2.b does not include the requirement that a report will be submitted when measured activities in the environmental samples satisfy the following:

$$\sum_i \frac{\text{Measured value}}{\text{Reporting Level}_i} \geq 1.0$$

3. LLD values should be included for Cs-134 and Cs-137 in Table 4.26-2.
4. Specification 3.3.3.9, Action b, has omitted the following phrase ". . . within 30 days and if unsuccessful explain in . . ."
5. Action 28 of Gaseous Instrumentation Table 3.3-12 needs to state ". . . in accordance with Table 4.11-2."
6. Liquid Instrumentation Table 3.3-13 addresses tank level indicating devices; however, they were omitted in surveillance Table 4.3-13.
7. Action b of Specifications 3.11.1.1 and 3.11.2.1, which addresses 10 CFR Part 20 limits, should be deleted or Action a should be reworded as: ". . . without delay restore the concentration within the above limits. If the concentration of radioactive materials being released in excess of the above limits is related to a plant operating characteristic, appropriate corrective measures (e.g., power reduction, plant shutdown) shall be taken to restore the concentration of radioactive materials being released to unrestricted areas to within the above limits. Provide . . ."
8. Notation d of Liquid Sampling Table 4.11.1 should also state that each batch shall be isolated and thoroughly mixed to assure representative sampling.
9. Table Notation c and g of Gas Sampling Table 4.11-2 should be reworded to state ". . . within a one-hour period unless the gross and iodine-131 failed fuel monitors and the noble gas monitor of the effected vent(s) shown there has not been an increase by more than a factor of three within a four-hour period."
10. Bases statements for the liquid and gaseous instrumentation were not included.
11. The following typos should be corrected:

- a. Table 3.3-13, Action 18, Part 1, should reference Specification 4.11.1.1.1 instead of 4.11.1.1.3.
- b. Notation a of Tables 4.11.1 and 4.11.2 should reference Tables 4.26-2 of Specification 4.26.1 instead of Table 4.12-1 of Specification 4.12.1.1.

ANO ODCM UNRESOLVED ISSUES

1. The environmental monitoring Tech. Specs. are not identified in the introductory section 1.0.
2. Table 2-1 could not be located. It is referenced in Section 2.1.
3. In Section 2.2.1 the equation $\Delta t * F$ does not result in a volume term because F is a dimensionless ratio.
4. where are Specifications ANO-2, 4.11.1.1.2, and ANO-1, 4.24.1.2, addressed in the ODCM? These specifications state that methodology in the ODCM will be used with the results of the sample analysis to ensure the concentrations are within the part 20 limits.
5. The methodology for the liquid dose projections required by Specifications ANO-2, 3.11.1.3, and ANO-1, 3.22.3, were not included. These specifications require dose projections to determine when the liquid waste treatment system shall be used.
6. Section 3.1.1 references Table 2-2. This table could not be located.
7. Section 3.2.2, Equation 8, should have the value 1.73×10^5 defined as the number of seconds in two days.
8. Define all the terms of Equation D_r , Section 3.4.1.
9. Inserting the expressions of 3.4.2.1 into the equations of Section 3.4.1 results in X/Q being squared. This should be clarified!
10. Numerous typographical errors were noted throughout the ODCM. This document should be carefully proofed before resubmittal.
11. Gaseous dose projection methodology is not presented in the ODCM as required by Specification ANO-1, 4.25.4 and ANO-2, 4.11.2.4.1.
12. The figure showing the sample locations and the table listing distance and direction from the plant of all sample locations for the environmental sampling program were not included as per Tech. Spec. 4.26.1.1.