



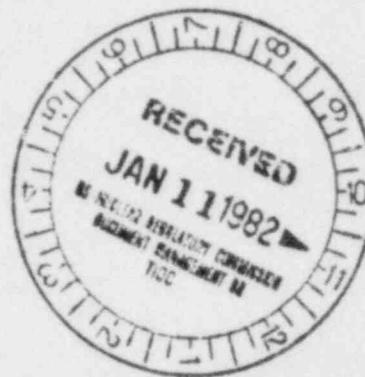
ARKANSAS POWER & LIGHT COMPANY
FIRST NATIONAL BUILDING/P.O. BOX 551/LITTLE ROCK, ARKANSAS 72203/(501) 371-4422

January 5, 1982

WILLIAM CAVANAUGH, III
Senior Vice President
Energy Supply

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



Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Fire Protection Related Technical
Specification Change Request

Gentlemen:

Attached are proposed changes to the Arkansas Nuclear One - Unit 2 Technical Specifications. These changes are being submitted in accordance with the ANO-2 Fire Protection Safety Evaluation Report (NUREG-0231) and as a supplement to our original Fire Protection Technical Specification submittal dated August 16, 1978. The attached changes incorporate Limiting Conditions for Operation and Surveillance Requirements for detectors and suppression equipment added to ANO-2 in response to items 3.5, 3.11, 3.14 and 3.15 to Table 3.1 of the ANO-2 Fire Protection SER.

During the initial preparation of these Technical Specifications, we discovered smoke detectors had not been installed in Fire Zone 2200-MM as committed in our letter to NRC dated July 7, 1978. Upon discovering this error, the affected area was cleared of all transient combustibles and a periodic fire watch was established. The NRC was notified of these circumstances in a phone conversation between our Mr. J. Ted Enos and NRC's Mr. Robert Clark and Mr. Robert Martin on November 18, 1981. Engineering work on the installation of detectors for Zone 2200-MM was initiated November 17, 1981. The smoke detectors were subsequently purchased, and are scheduled to be installed and declared operable on January 15, 1982.

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It is our belief that the oversight of Zone 2200-MM was an isolated case. However, to assure ourselves that there are no other discrepancies we will be conducting an audit to verify that all commitments made to the NRC during the development and as a result of the ANO-1 and 2 Fire Protection SER's have been completed.

The following discussion provides an individual basis for each of the attached proposed changed sections. These changes incorporate all applicable changes in our August 16, 1978, change request and therefore supersedes that request. Accordingly, we request the accompanying fee submitted with the August 16, 1978 submittal be applied to this request.

Specification 3.3.3.8(a)

As a result of adding numerous new smoke and heat detectors to the ANO-2 Auxiliary Building it is conceivable that some of these detectors during certain modes of operation will be located in high radiation areas. If the minimum number of detectors in a high radiation area became inoperable it would not be consistent with ALARA guidelines to establish a fire watch in such an area. Therefore an exemption from this requirement is necessary.

Section 4.3.3.8.1 and 4.3.3.8.2

As was stated in the basis for Section 3.3.3.8(a) some areas of ANO-2 where smoke detectors are located could conceivably become high radiation areas during certain modes of operation. For these areas we are proposing only to test the detectors when accessible. The test frequency, however, shall not exceed once per refueling cycle.

Table 3.3-11

The additional instrument locations added to Table 3.3-11 are required by item 3.14 to Table 3.1 of the ANO-2 Fire Protection SER. These locations include all areas outlined in our letter to the NRC dated July 7, 1978, in which we committed to have detectors installed. The minimum instruments operable represent one-half the total instruments available in each zone, room or area.

Smoke detectors were not installed in room 2038, located in fire zone 2040-JJ. This room is a high radiation area housing the preconcentrator ion exchanger, boric acid condensate ion exchanger and waste condensate ion exchanger tanks and their associated valves. There are no safety related cables passing through or located in this room. Detectors are located directly outside of this room.

Specification 3.7.10.2

The additional spray and/or sprinkler systems added to this specification are required by items 3.5 and 3.11 to Table 3.1 of the ANO-2 Fire Protection SER.

Specification 3.7.10.3

Additional fire hose stations were added inside containment as a result of the ANO-2 Fire Protection SER. These stations are inaccessible during power operation; therefore, Specification 3.7.10.3 should not be applied to these specific stations.

Specification 4.7.10.3

As was stated above, additional fire hose stations were added inside containment as a result of the ANO-2 Fire Protection SER. Since these stations are inaccessible during power operations a 31 day visual inspection cannot be accomplished. A visual inspection will be completed at least once per 18 months.

Table 3.7-7

The additional fire hose stations added to Table 3.7-7 are required by item 3.15 to Table 3.1 of the ANO-2 Fire Protection SER.

Pertaining to our original Fire Protection Technical Specification submittal dated August 16, 1978, the following additional information is provided.

Specification 3.3.3.8(d)

This proposed change is no longer needed. Amendment Number 22 to the ANO-2 Operating License modified Specification 3.3.3.8(a) exempting detector zones located inside primary containment from meeting the requirements of Specification 3.3.3.8(a). Therefore, we withdraw our original proposed change request for Specification 3.3.3.8(d).

Table 3.3-11

This proposed change is no longer needed. As a result of the ANO-2 Fire Protection SER the entire fire detection system for ANO-2 has been upgraded. Amendment Number 23 to the ANO-2 Operating License modified Table 3.3-11 to reflect present designs. Therefore, we withdraw our original proposed change request for Table 3.3-11.

Specifications 4.7.10.2(b)3 and 4.7.10.2(c)

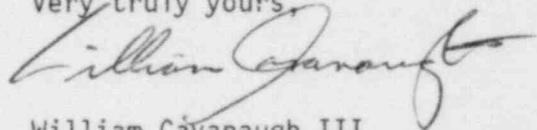
To obtain a better understanding of testing requirements for open head sprinkler systems and specifically to determine if an air flow test once per three years is necessary to demonstrate operability, AP&L contacted Mr. Hank Poitres of Grinnel Fire Protection Special Hazards Group and Mr. Robert Hodnett of NFPA to solicit their professional opinions. On December 10, 1981, Mr. Poitres informed us that he was not familiar with any requirements for an air flow test of open head sprinkler systems for the application we described. Mr. Poitres continued to discuss the advantages and disadvantages of such a test and came to the conclusion that an air flow test may be useful in outside installations (e.g., coal conveyor belt spray system) where it would be possible for some type of obstruction to find its way into the spray nozzle opening. However, for

a controlled environment, similar to those in which our systems are located, he did not see the benefit of such a test. Mr. Poitres indicated that a visual inspection of the system should be adequate.

The air flow test requirement was also discussed with Mr. Robert Hodnett, the lead individual at NFPA for pamphlet number 15. Mr. Hodnett stated in a phone conversation on December 10, 1981, that air flow tests of the type we described were not covered in NFPA pamphlet number 15 or 13. Considering the 12 and 18 month tests we were required to perform, Mr. Hodnett personally did not believe the need for an air flow test on our indoor spray systems was justified.

Based on our conversations with these individuals, and recognizing our spray and/or sprinkler systems are housed in a controlled environment, functional tests which include simulated automatic actuation of the system are performed at least once per 18 months, and inspections of the spray headers to verify integrity are carried out at least once per 18 months, we do not feel that specifications 4.7.10.2(b)3 or 4.7.10.2(c) are warranted. To further support our position additional contacts will be made with Mr. Poitres and Mr. Hodnett to determine if there are any standards or guidelines which address air flow tests. If such material exists we will inform you. If such material does not exist we will recommend that this topic be formally addressed in some type of guideline.

Very truly yours,



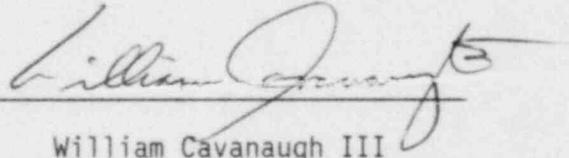
William Cavanaugh III

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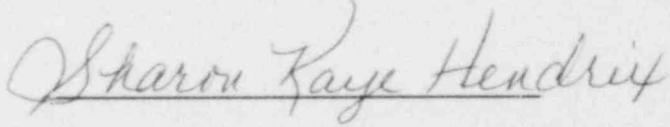
Attachment

STATE OF ARKANSAS)
)
COUNTY OF PULASKI) SS

I, William Cavanaugh III, being duly sworn, subscribe to and say that I am Senior Vice President for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 2CANØi82Ø1 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.


William Cavanaugh III

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 6 day of January, 1982.


Notary Public

My Commission Expires:
9-19-89