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

August 23, 1982

WILLIAM CAVANAUGH, III
Senior Vice President
Energy Supply

2CAN088208

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
Containment Penetration Conductor
Overcurrent Protection Technical
Specification Change Request

Gentlemen:

Attached is a Technical Specification Change Request for your review and approval. The requested change allows for testing of containment penetration conductor overcurrent protective devices in a manner which will satisfy the intent of the requirement for demonstrating operability and remove unrealistic test conditions currently specified in the Technical Specifications. A detailed discussion of the reason for the proposed change is attached.

Accordingly, pursuant to the requirements of 10 CFR 170.22 we have determined these requests to be a Class II amendment. A check in the amount of $1,200 is remitted.

Very truly yours,

William Cavanaugh III

A001
w/check:
$1200.00

WC:JK:sl

Attachments

STATE OF ARKANSAS)
) SS
COUNTY OF PULASKI)

I, William Cavanaugh, III, being duly sworn, subscribe to and say that I am Senior Vice President, Energy Supply for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 2CAN088208 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 23 day of August, 1982.

Sharon Kaye Hendrix

Notary Public

My Commission Expires:

9-19-89

TECHNICAL SPECIFICATION CHANGE REQUEST
CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES
SURVEILLANCE REQUIREMENT 4.8.2.5

Reason for Proposed Change

Surveillance Requirement 4.8.2.5.a.1(b) requires that containment penetration conductor overcurrent protective devices be demonstrated OPERABLE by a test which "includes simulated automatic actuation of the system and verifying that each relay and associated circuit breakers and control circuits function as designed and as specified in Table 3.8-1." These existing test criteria as specified impose unrealistic and impractical conditions for field personnel. Specifically, the field test currently requires the injection of high magnitude currents (10-15 times normal load currents) to breakers and correspondingly the requirement to monitor the breaker response time. These currents are excessively high (values of 1000 amps, 2400 amps, 6000 amps and as high as 20,000 amps) and the response times to monitor are very short (.012 and .017 seconds predominately).

Although these protective devices will provide the designed short circuit protection, they are not designed to withstand repeated cycles at overcurrent conditions. Repetitive testing of this magnitude will be deleterious to these units. Additionally, since operation of the overcurrent trip element is instantaneous, recording the response time is of little value.

The attached proposed Technical Specification provides for deletion of the requirement to measure response times and compare them to the design criteria. It also deletes the tabulation of response times and trip setpoints from Table 3.8-1 and the Table Notation on page 3/4 8-32.

This proposed change clarifies the required method of testing the Containment Penetration Conductor Overcurrent Protective Devices but does not alter the intent of the Technical Specification nor does this clarification require any alteration of the physical station.

Accordingly, it is concluded that: (1) the amendment application does not involve an unreviewed safety question as defined in 10 CFR 50.59, nor does it present significant hazard considerations not described or implicit in the Final Safety Analysis; (2) there is reasonable assurance that the health and safety of the public will not be endangered by the amendment; and (3) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.