

ARKANSAS POWER & LIGHT COMPANY POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

August 31, 1982

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Director of Nuclear Reactor Regulation ATTN: Mr. J. F. Stolz, Chief Operating Reactors Branch #4 Division of Licensing U. S. Nuclear Regulatory Commission Washington, D. C. 20555

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 - Units 1 & 2 Docket Nos. 50-313 & 50-368 License Nos. DPR-51 and NPF-6 Technical Specification Revision for Snubber Surveillance

Gentlemen:

In our July 17, 1981, letter (ØCANØ781Ø8) AP&L commited to submit Technical Specification amendments to include mechanical snubber surveillance requirements. However, in our October 28, 1981, letter (ØCAN1Ø811Ø) AP&L informed NRC that during the final review process, it was determined that some of the requirements listed in the Standard Technical Specifications could not be met due to the unavailability of vendor equipment. We informed NRC that this caused AP&L to modify our approach to this Technical Specification amendment and delay our submittal in order to gather documentation from vendors. At that point in time, our intention was to submit a proposed Technical Specification amendment at a later date which included language to account for the lack of vendor equipment suitable for on-site testing of snubbers.

NRC stated in your June 17, 1981, letter (ØCNAØ68113) that the reason for requesting the Technical Specification revision at that time was because of the uncertainty of having an acceptable code requirement for inservice inspection and testing of snubbers in the near future. AP&L was then, and is still now, very reluctant to agree to changing our Technical Specifications in such a manner that would require the implementation of technology which is yet to be developed.

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Mr. J. F. Stolz & Mr. Robert A. Clark

It has now become apparent to AP&L that vendor efforts to develop suitable test equipment have not kept pace with the work sponsored by the American Society of Mechanical Engineers in developing the program "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints (snubbers)", ANSI/ASME OM-4. In view of this, AP&L plans to review the final version of the ANSI/ASME OM-4 standard from the standpoint of assessing its applicability to ANO. Should ASME OM-4 be determined appropriate to meet our snubber surveillance requirements, we will at that time commit to incorporate this standard as an integral part of the inspection program for Arkansas Nuclear One, Units One and Two. Therefore, we have determined that no license amendment application is required at this time.

Very truly yours,

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John R. Marshall Manager, Licensing

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