



**Entergy
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Neil S. "Buzz" Carns

Vice President
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October 9, 1990

2CAN109004

U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Containment Isolation Valves, Type C Leakage Test
Technical Specification Change Request

Gentlemen:

Attached for your review and approval are proposed Technical Specifications changes revising ANO Unit 2 Technical Specification Table 3.6-1. This change deletes the exemption for containment isolation check valves from Type C leakage tests.

The proposed change has been evaluated in accordance with 10CFR50.91(a)(1) using the criteria in 10CFR50.92(c) and has determined that these changes involve no significant hazards considerations. The bases for these determinations are included in the enclosed submittal. Although the circumstances of this proposed amendment are not exigent or emergency, your prompt review and approval is requested.

We request that the effective date for this change be 30 days after NRC issuance of the amendment to allow for distribution and procedural revisions necessary to implement this change.

Very truly yours,

NSC/dvj
Attachments/Enclosures

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U. S. NRC
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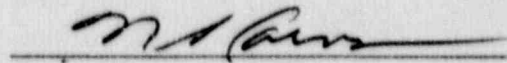
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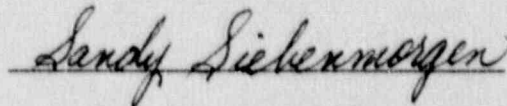
SS

I, N. S. Carns, being duly sworn, subscribe to and say that I am Vice President, Operations ANO for Entergy Operations, Inc.; that I have full authority to execute this oath; that I have read the document numbered 2CAN109004 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.



N. S. Carns

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 9th day of October, 1990.



Notary Public

My Commission Expires:

May 11, 2000

PROPOSED TECHNICAL SPECIFICATION CHANGE

LICENSE AMENDMENT REQUEST

IN THE MATTER OF AMENDING

LICENSE NO. NPF-6

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT 2

DOCKET NO. 50-368

PROPOSED CHANGE

This change to Technical Specification Table 3.6-1 deletes the # sign from the check valves listed in the table. This # sign annotates the valves as "not subject to Type C leakage tests."

BACKGROUND

Inspection Report 50-313/88-47; 50-368/88-47 and a clarification of notice of violation 313/8847-05, which the staff provided in a letter dated June 22, 1990 (OCNA069018), identified a deficiency in local leak rate testing, Type C for check valves at Arkansas Nuclear One. 10CFR Part 50, Section 50.54 (o) requires that the primary reactor containment shall be subject to the requirements of 10CFR Part 50, Appendix J. Appendix J requires that periodic leak testing of the systems penetrating the primary containment be conducted.

DISCUSSION

10 CFR 50 Appendix J II.H.2 requires that check valves which are credited as containment isolation valves per the General Design Criteria, be Type C leak rate tested. ANO-2 Technical Specification Table 3.6-1 identifies these containment isolation valves. Since original issuance a footnote has existed in this Table which has exempted the requirement to local leak rate test containment isolation check valves. Entergy Operations proposes to remove the # sign referencing this footnote.

DESCRIPTION OF SIGNIFICANT HAZARDS

An evaluation of the proposed change has been performed in accordance with 10 CFR 50.91 (a)(1) regarding no significant hazards consideration using the standards in 10 CFR 50.92(c). A discussion of those standards as they relate to this amendment request follows:

Criterion 1 - Does not involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated.

This change enhances the requirements for local leak rate testing and therefore does not involve a significant increase in the probability of an accident previously evaluated. By performing a Type C local leak rate test on the check valves, the consequences of an accident are reduced by assuring that these valves serve to limit radioactive releases to the atmosphere.

Criterion 2 - Does not create the Possibility of a New or Different Kind of Accident from any Previously Evaluated.

Criterion 2 - Does not create the Possibility of a New or Different Kind of Accident from any Previously Evaluated.

The addition of the requirement to perform Type C local leak rate testing on the containment isolation check valves adds a previous requirement to the Technical Specifications. Therefore this change does not create the possibility of a new or different kind of accident from any previously evaluated.

Criterion 3 - Does Not Involve a Significant Reduction in the Margin of Safety.

Adding the requirement to perform local leak rate testing on the containment penetration check valves ensures that the valves will function to reduce containment leakage and limit radioactive releases. This change therefore maintains the margin to safety.

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists. The proposed amendment most closely Matches example (ii).

"A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, e.g., a more stringent surveillance requirement."

Based on the above evaluation it is concluded that the proposed Technical Specification change does not constitute a significant hazards concern.

PROPOSED TECHNICAL SPECIFICATION CHANGES