



November 30, 1990

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U. S. Nuclear Regulatory Commission
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SUBJECT: Arkansas Nuclear One - Unit 1
Docket No. 50-313
License No. DPR-51
Information About the Modifications to
Be Deferred From the Ninth Refueling Outage

Gentlemen:

During a meeting on July 23, 1990, Arkansas Nuclear One's (ANO) management informed the NRR Project Managers of the objectives and scope of the upcoming ANO-1 ninth refueling outage (1R9). ANO-1 is currently in 1R9. The scope for the 1R9 outage is one of the most ambitious in ANO-1's history with major activities including: steam generator chemical cleaning and preventive sleeving; service water system cleaning and major upgrades associated with Generic Letter 89-13; numerous secondary plant betterments to improve plant performance and transient response; redesign of the High Pressure Injection (HPI) system to address the HPI line break issue; and major pipe support modifications to correct deficiencies which have been identified as a result of improvement programs such as our Isometric Update efforts. The outage was originally scheduled to be completed in 70 days. During this period we anticipated an expenditure in excess of 145,000 craft manhours. Although most of our objectives have been met, due to unforeseen developments as discussed with members of Region IV and NRR staff on November 20, 1990, ANO has found it necessary to defer some scheduled modifications. A special outage is being scheduled to complete the modifications being deferred with the exception of one modification to be implemented during the tenth refueling outage (1R10). These deferred modifications do not adversely affect the safe operation of ANO-1.

This action was discussed during the November 20, 1990, ANO/NRC Performance Meeting with the Regional Administrator; Region IV Director, Division of Reactor Projects; Region IV Director, Division of Reactor Safety; and the NRR Project Managers among other Region IV and NRR staff personnel. The purpose of this letter is to provide information about the deferred modifications.

The modifications that ANO is deferring falls into three categories. These categories are Piping Issues, NRC Commitments, and Plant Betterment. Each category of modifications is discussed below.

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Piping Issues

Attachment 1 provides a listing of the Design Change Packages or Limited Change Packages (DCP or LCP) that are being deferred or partially deferred concerning piping issues. There are two types of modifications within this category. The first type is those modifications to a system to bring the piping supports into compliance with the American Institute of Steel Construction (AISC) specification. This type of modifications makes up the majority of the piping modifications that are being deferred. The systems affected by these modifications have been reviewed for operability and it has been determined that the systems are operable in their current state.

To support the operability determination for LCPs 89-1023 and 89-1023A, "Hydrogen Sampler System Modifications", ANO will perform a Continued Safe Operation (CSO) determination in accordance with ANO Procedure 1062.008, Revision 0.

The second type of piping concern modifications is represented by the following three modification packages:

- DCP 89-1039, "Qualified ICW Piping Penetrations"
- DCP 89-1040, "Support Modifications Required to Qualify Chilled Water System"
- DCP 90-1006, "Install an Isolation Valve in the Reactor Building Drain Line"

The piping and supports for these systems are qualified under the original design basis methods. This type of modification involves Seismic Category 1 piping though a containment penetration with Seismic Category 2 piping on each end of the Seismic Category 1 pipe. This configuration is found for non-safety related piping entering the containment. For these three modification packages, the present design of the piping and supports for these systems, in the vicinity of the penetrations, do not meet current Seismic Category 1 criteria. These modifications in general are to upgrade the piping design of these systems to modern practice.

There are other design upgrades not related to piping and supports that are also part of these DCPs.

NRC Commitments

Three DCPs being deferred or partially deferred are related to previous commitments made to the NRC and are scheduled to be completed during this outage. These packages are:

- DCP 85-1050, "Remote Operation of MU-13"
- DCP 90-1032, "Evaluate AOV CV3814 and CV3815"
- LCP 90-7027, "SW Cooling Coil Replacement"

These modifications do not have operability concerns associated with them.

DCP 85-1050 will install a motor operator to valve MU-13 in response to a Human Engineering Deficiency (HED) identified in the ANO-1 CRDR Final Summary Report (1CAN088504). In response to the NRC Diagnostic Evaluation, DCP 90-1032 will provide new Section VIII air accumulators and seismically qualify associated piping as well as providing double check valves for AOVs CV3814 and CV3815 to isolate the accumulators from the instrument air lines. The resolution of this design issue is also related to the ANO revised response to Generic Letter 88-14. LCP 90-7027 will replace the leaking VCC-2D coil as committed in LER 1-90-001.

These commitments will be dispositioned individually in future correspondence with the NRC prior to startup.


Plant Betterment

Attachment 2 provides a listing of those DCPs, LCPs, and the Work Plan that are being deferred or partially deferred concerning plant betterment. These modifications are upgrades to the plant and do not have operability concerns associated with them.

In conclusion, the deferral of these modifications pose no undue risk to the public health and safety. These modifications are to be implemented at a later date.

Should you have any questions regarding this issue, please contact me.

Very truly yours,



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ATTACHMENT 1

LISTING OF PIPING CONCERN
DCPs AND LCPs

DCP 89-1023	Hydrogen Sampler System Modifications
DCP 89-1023A	Hydrogen Sampler System Modifications
DCP 89-1039	Qualified ICW Piping Penetrations
DCP 89-1040	Support Modifications Required to Qualify Chilled Water System
DCP 89-1041	MFW Outside Reactor Building Code Upgrade
DCP 89-1045	Service Water Return Line Code Compliance (Auxiliary Building)
DCP 89-1051	Service Water Inside Reactor Building Code Compliance
DCP 90-1006	Install an Isolation Valve in the Reactor Building Drain Line
LCP 90-5015	Flush Connection for Lube Oil Coolers
LCP 90-5019	Pressurizer Piping Support Modifications
LCP 90-5021	Quench Tank Drain Line Pipe Replacement in the Auxiliary Building
LCP 90-5027	Firewater System Inside Containment
LCP 90-5037	1R9 Snubber Modifications

ATTACHMENT 2

LISTING OF PLANT BETTERMENT
DCPs, LCPs, AND WORK PLAN

Work Plan 04-002	Reactor Coolant Drain Piping Replacement
DCP 83-1694	Replace Safe-T-Climb with Ladder Cage
DCP 88-1070	Heater Drain Pump Recirculation Valve
DCP 88-2250	RCP "B" Seal Area Platform
DCP 90-1017	E1A and B High Level Dumps
DCP 90-1020	LP Turbine Seal Regulators
DCP 90-1023	MSR Separator Drains
DCP 90-1024	T40A and B High Level Dumps
DCP 90-1025	MFW Pump Recirculation
DCP 90-1035	E2A and B for Startup Boiler Control
LCP 90-5014	Reactor Building Cooler Flow Spools Restricting Orifices
LCP 90-5055	Polar Crane Vents