

ENCLOSURE
PROPOSED TECHNICAL SPECIFICATION
AND
RESPECTIVE SAFETY ANALYSES
IN THE MATTER OF AMENDING
LICENSE NOS. DPR-51 AND NPF-6
ENTERGY OPERATIONS, INCORPORATED
ARKANSAS NUCLEAR ONE, UNITS 1 AND 2
DOCKETS NOS. 50-313 AND 50-368

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PROPOSED CHANGE

The proposed change to ANO-1 Technical Specification (TS) deletes Item 6.9 l and Section 6.13 relating to Environmental Qualifications. The change to ANO-2 TS deletes Item 6.10 m and Section 6.12 relating to Environmental Qualifications.

BACKGROUND

By letter dated October 24, 1980, the staff issued an order the subject of which was "Order for Modification of License Concerning Environmental Qualification of Safety-Related Electrical Equipment." In this Order the License for Arkansas Nuclear One was modified to include Environmental Qualifications as part of Section 6 Administrative Controls of the Technical Specifications. Since that time Environmental Qualifications has been included in the Code of Federal Regulations as 10CFR50.49, "Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants."

DISCUSSION

On June 30, 1982 the commission issued interim final rule 10CFR50.49. As 10CFR50.49 supersedes the October 24, 1980 Order, Entergy proposes to remove the reference to the October 24, 1980 Order from the TS as an Administrative Change. The deadline imposed by the Order has been superceded by 10CFR50.49 section g. The requirement for complete and auditable records to be maintained in a central location has been superceded by 10CFR50.49 section j. This change is being made to simplify the TS by removing an unnecessary specification which has been superceded by another regulatory requirement.

DETERMINATION OF SIGNIFICANT HAZARDS

An evaluation of the proposed change has been performed in accordance with 10CFR50.91(a)(1) regarding no significant hazards consideration using the standards in 10CFR50.92(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.

As the Environmental Qualifications of equipment is included in the Code of Federal Regulations this constitutes an Administrative Change and therefore does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2 - Does not create the possibility of a new or different kind of accident from any previously evaluated.

No new or different kind of accident from any previously evaluated is created as this is an Administrative Change. The Environmental Qualifications of equipment is required by the Code of Federal Regulations, 10CFR50.49.

Criterion 3 - Does not involve a significant reduction in the Margin of Safety.

No reduction in the Margin of Safety is incurred as Environmental Qualifications of equipment is require by 10CFR50.49. This supersedes the October 24, 1980 Order.

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 examples.

(i) "A purely administrative change to Technical Specification: for example, a change to achieve consistency throughout the Technical Specifications, correction of an error or a change in nomenclature."

and

(vii) "A change to conform a license to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations."

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

ANO-UNIT 1

- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by Section 17 of the Quality Assurance Manual for Operations.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10CFR50.59.
- k. Records of meetings of the PSC and the SRC.
- l. (DELETED)
- m. Records of the service lives of the seals of all hydraulic snubbers applicable to Specification 3.16 including the date at which the service life commences and associated installation and maintenance records.
- n. Records of analyses required by the Radiological Environmental Monitoring Program.

6.10 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.11 HIGH RADIATION AREA

6.11.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10CFR20, each high radiation area (as defined in 20.202(b)(3) of 10CFR20) in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and shall be controlled by requiring the issuance of a radiation work permit. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a pre-set integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation work permit.

6.13 (DELETED)

PROPOSED TECHNICAL SPECIFICATION CHANGES

ANO-UNIT 2

ADMINISTRATIVE CONTROL

- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of in-service inspections performed pursuant to these Technical Specifications.
- i. Records of Quality Assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10CFR50.59.
- k. Records of meetings of the PSC and the SRC.
- l. Records of changes to the Core Protection Calculator System (CPCS) SOFTWARE. Changes to the CPCS SOFTWARE shall be made in accordance with methods approved by the NRC. These records shall include the following:
 - 1. Purpose of change.
 - 2. Detailed description of changes including algorithms, changes to the assembly listings, checksums and disk identification numbers.
 - 3. Summary of validation test results.
- m. (DELETED)
- n. Records of the service lives of the seals of all hydraulic snubbers required by Specification 3.7.8, including the date at which the service life commences and associated installation and maintenance records.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 (DELETED)

ADMINISTRATIVE CONTROL

6.12.2 (DELETED)

6.13 HIGH RADIATION AREA

6.13.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 JFR 20, each high radiation area (as defined in 20.202(b)(3) of 10 CFR 20) in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring the issuance of a radiation work permit. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation work permit.

6.13.2 The requirements of 6.13.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and access to these areas shall be maintained under the administrative control of the Shift Supervisor on duty and/or the designated radiation protection manager.