



**Entergy
Operations**

Entergy Operations, Inc.
Route 3 Box 137G
Russellville, AR 72801
Tel 501-964-8888

Neil S. "Buzz" Carns
Vice President
Operations ANO

February 20, 1991

0CAN029101

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

Subject: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 & 50-368
License Nos. DPR-51 & NPF-6
Minimum Shift Crew Composition
Technical Specification Change Request

Gentlemen:

Attached for your review and approval are proposed changes revising Table 6.2-1 of the Administrative sections for ANO-1 and ANO-2 Technical Specifications. This change increases the number of licensed and non-licensed operators required when the plant is in a mode above cold shutdown.

In accordance with 10CFR50.91(a)(1), and using the criteria in 10CFR50.92(c), Entergy Operations has determined that the change involves no significant hazards consideration. The basis for these determinations are included in the enclosed submittal. Although the circumstances of this proposed amendment is 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 of this change.

Very truly yours,

NSC:CWT
Attachments

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PDR ADOCK 05000313
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cc: Mr. Robert Martin
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

NRC Senior Resident Inspector
Arkansas Nuclear One - ANO-1 & 2
Number 1, Nuclear Plant Road
Russellville, AR 72801

Mr. Thomas W. Alexion
NRR Project Manager, Region IV/ANO-1
U. S. Nuclear Regulatory Commission
NRR Mail Stop 13-D-16
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

Ms. Sheri Peterson
NRR Project Manager, Region IV/ANO-2
U. S. Nuclear Regulatory Commission
NRR Mail Stop 13-D-18
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

Ms. Greta Dicus, Director
Division of Radiation Control
and Emergency Management
Arkansas Department of Health
4815 West Markham Street
Little Rock, AR 72201

STATE OF ARKANSAS)
)
COUNTY OF LOGAN) SS

AFFIRMATION

I, N. S. Carns, being duly sworn, subscribe to and say that I am Vice President, Operations ANO for Entergy; that I have full authority to execute this affirmation; that I have read the document numbered 0CAN029101 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
N. S. Carns

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 20th day of February, 1991.

Sandy Siebenmorgen
Notary Public

My Commission Expires:

May 11, 2000

ENCLOSURE

PROPOSED TECHNICAL SPECIFICATION

AND

RESPECTIVE SAFETY ANALYSES

IN THE MATTER OF AMENDING

License Nos. DPR-51 & NPF-6

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNITS 1 & 2

Docket Nos. 50-313 & 50-368

PROPOSED CHANGE

This change to the ANO-1 and ANO-2 Technical Specifications Table 6.2-1 increases the required number of senior licensed operators from one to two and number of non-licensed operators from two to three above cold shutdown conditions.

BACKGROUND

A revision to 10CFR50.54 provided for an increase in the required number of Licensed Operators on shift. Specifically this change increased the required number of Senior Reactor Operators (SROs) for a 2 Unit Site from one for each unit to three for both units if both Units are above Cold Shutdown condition. This was based on NUREG 0737 Item I.A.1.3. Initially Entergy Operations requested and received an exemption from the requirement to have two SROs per shift until such time as additional SROs become available.

Although reviews completed for the ANO-2 Emergency Operating Procedure (EOP) showed that the staffing level required to support the EOP was two senior licensed operators, Entergy Operations desires to increase the number of senior licensed operators from two to three above Cold Shutdown. Core Operations has been revised to reflect this. For consistency, a revision to the Technical Specifications is needed. In OCAI 49012 (Response to IR 90-01, Unit 2 EOP Audit) Entergy committed to the NRC to complete the revision by February 28, 1991.

DISCUSSION

10CFR50.54 has been revised to reflect NUREG 0737 Item I.A.1.3 to increase the staffing level for a two Unit site to require three Senior Reactor Operators (SROs) if both the Units are above Cold Shutdown condition. If only one Unit is above Cold Shutdown the required number of SROs is two. Arkansas Nuclear One (ANO) is a two Unit site with a separated control room. The two Units are of different NSSS design, Babcock and Wilcox and Combustion Engineering. Due to the dissimilarities between the two Units at ANO, Entergy Operations feels that each Unit should have two SROs on shift when that Unit is above Cold Shutdown. ANO has met this staffing level for over a year. This staffing level is conservative with respect to 10CFR50.54.

In response to inspection report 50-315/90-01; 50-368/90-01, Entergy Operations performed validations of the ANO-2 EOP. This validation consisted of using both simulator scenarios and local action performances. The simulator validations required an observation team and an operating crew. Each scenario was run twice with different operating crews and validated against set criteria. A record of the time and actions required by both licensed and non-licensed operators was maintained. For local actions, different operators were required to

perform a walk through of each local action in support of the EOP and a performance time was recorded. Based on the results of this validation, Entergy Operations has concluded that two non-licensed operators are required to support the EOP, however we desire to increase the TS requirement from two to three. This is conservative in regard to 10CFR50.54, as the table requires only two non-licensed operators per shift above cold shutdown conditions. For consistency the TS of both Units are to be revised to reflect this change.

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.

The proposed change increases the required number of both licensed and non-licensed operators required to be on shift to conform to 10CFR50.54 and our commitment. This change is conservative with respect to the requirements of 10CFR50.54 and therefore does not involve an 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.

The proposed changes are administrative in nature, not accident related and, therefore, 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.

As this proposed change will increase the number of operators available to respond to an abnormal or transient situation, the margin of safety will not be reduced.

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 the following examples provided in 51 F.R. 7750, dated March 6, 1986:

(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" (for number of non-licensed operators.)

(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" (for number of licensed operators.)

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