

February 22, 1991

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

SUBJECT: Arkansas Nuclear One - Units 1 and 2

Docket Nos. 50-313 and 50-368 License Nos. DPR-51 and NPF-6

Amended GL 88-17 (Loss of DHR) 90-day Response

Gentlemen:

This letter is provided to amend our 90-day response to Generic Letter 88-17, "Loss of Decay Heat Removal" (letter ØCANØ389Ø8 dated March 14, 1989) based on conversations between ANO personnel and NRC Staff personnel on February 20, 1991.

ANO plans to utilize conservatively calculated estimates or real time CET projections of time to core boiling, for establishing containment closure rather than the 200°F value included in the original response. As discussed during our telephone conversation with the NRC Staff, we believe that this is an acceptable alternative for meeting the intent of Generic Letter 98-17.

The paragraph to be amended is located on page three of our March 14, 1989, letter and is reiterated in its original form in the following paragraph:

"The ANO-2 Operations procedure governing draining of the RCS has been revised to provide the operators a listing of specific actions necessary to establish containment closure prior to reducing RCS level to the GL 88-17 defined reduced inventory conditions. This procedure is also referenced by the abnormal operations procedure used for a loss of DHR to establish containment closure prior to exceeding 200°F RCS temperature. Additionally, this procedure assures availability of two RCS temperature and level indications for draining operations, and defines the appropriate monitoring and periodic logging requirements associated with DHR operations."

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The preceding paragraph should be deleted in its entirety and replaced with the following:

"The ANO-2 Operations procedure controlling shutdown cooling operations has been revised to provide the operators a listing of specific action: necessary to initiate containment closure based on time to core poiling. This procedure is referenced by the abnormal operations procedure used for a Loss of DHR to initiate containment closure based on conservatively calculated estimates or real-time CET projections of time to core boiling. The following procedural requirements have been implemented which will provide assurance that containment closure wi'l be established prior to core uncovery during Loss of DHR conditions:

- If time to boiling is less than or equal to 45 minutes, immediate actions for containment closure will be initiated.
- Containment closure will be established in less than 45 minutes of initiation, and
- 3) Time to core uncovery will be verified to be greater than 2 hours when in reduced inventory conditions.

Additionally, this procedure maximizes the availability of two CETs and assures that at least two level indications are available for draining operations, and defines the appropriate monitoring and periodic logging requirements associated with DHR operations."

Should you have any questions, please contact me at (501) 964-8601.

Very truly yours,

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JJF/DWB/mmg

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