

ENCLOSURE
PROPOSED TECHNICAL SPECIFICATION
AND
RESPECTIVE SAFETY ANALYSES
IN THE MATTER OF AMENDING
LICENSE NO. NPF-6
ENTERGY OPERATIONS, INC.
ARKANSAS NUCLEAR ONE, UNIT
DOCKET NO. 50-368

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PROPOSED CHANGE

This proposed change to the ANO-2 Technical Specifications will change the Applicable Modes (Table 3.3-6) from "ALL MODES" to "During purge or when ventilating during Mode 6 Core Alterations" and Modes in which the Surveillance is Required (Table 4.3-3, from "ALL MODES" to "During purge or when ventilating during Mode 6 Core Alterations" for the Purge and Exhaust Isolation Gaseous Activity Monitoring Instrumentation. Additionally the asterisks are being replaced in the tables with note numbers.

BACKGROUND

Table 3.3-6 lists the Area and Process Radiation Monitoring Instrumentation required to be OPERABLE. The applicable modes for the Purge and Exhaust Isolation Gaseous Activity Monitoring Instrumentation is currently listed as "ALL MODES". Table 4.3-3 lists the Area and Process Radiation Monitoring Instrumentation Surveillance Requirements as during "ALL MODES". Asterisks are currently used to annotate notes in the tables.

DISCUSSION

If the Purge and Exhaust Isolation Gaseous Activity Monitoring Instrumentation is declared inoperable, the ACTION refers to the ACTION of Specification 3.9.9. The ACTION of 3.9.9 states that "With the requirements of the above specification not satisfied, suspend all operations involving movement of fuel assemblies or CEAs within the pressure vessel. The provisions of Specification 3.0.3 are not applicable." Additionally Specification 3.6.1.6 requires that the containment purge supply and exhaust valves shall be closed and handswitch keys removed when in Modes 1, 2, 3 and 4. The OPERABILITY of the radiation monitoring channels ensures that 1) the radiation levels are continually measured in the areas served by the individual channels and 2) both the alarm and automatic action are initiated when the radiation level trip setpoint is exceeded. The OPERABILITY of the Purge and Exhaust Isolation valves is to ensure radioactive material release from a fuel element rupture is contained so that the offsite consequences are minimized. As the use of this system is restricted to Modes 5 and 6 by Specification 3.6.1.6, the requirement for applicability is limited to when the Containment Purge and Exhaust System is being used for Purging of the Containment Building or when ventilating during Mode 6 core alterations. This change will eliminate challenges to the system with unnecessary surveillance activities when the system is not required to be operable. This change is effectively administrative in nature as the requirement for the OPERABILITY of the system which this instrumentation serves is required only during purging and core alterations. This change is also consistent with the Combustion Engineering Standard Technical Specifications

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.

Changing the requirement for system OPERABILITY to limit the requirement to only those plant conditions when the system actually has the potential for creating a release path does not involve an increase in the probability or consequences of an accident previously evaluated. The radiation levels are continually measured in the areas served by the individual channels and both the alarm and automatic action are initiated when the radiation level trip setpoint is exceeded. This change is effectively administrative in nature as the requirement for the OPERABILITY of the system which this instrumentation serves is required only during purging and core alterations and the purge valves are key locked closed during Modes 1, 2, 3 and 4.

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

This instrumentation is not involved in the creation of an accident, only in the mitigation of a previously assumed accident and would be OPERABLE for this function. 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.

As this proposed change still requires the radiation monitoring system to be in use and capable of performing its function when the actual potential for a release exists (during Purging operations or when ventilating during core alterations) 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 example (i):

"A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature."

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

TABLE 3.3-6

RADIATION MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ALARM/TRIP SETPOINT</u>	<u>MEASUREMENT RANGE</u>	<u>ACTION</u>
1. AREA MONITORS					
a. Spent Fuel Pool Area Monitor	1	Note 1	$\leq 1.5 \times 10^{-2}$ R/hr	$10^{-6} - 10^3$ R/hr	13
b. Containment High Range	2	1, 2, 3 & 4	Not Applicable	$1 - 10^7$ R/hr	18
2. PROCESS MONITORS					
a. Containment					
i. Gaseous Activity					
a) Purge & Exhaust Isolation	1	Note 2	$\leq 2 \times$ background	$10 - 10^{-6}$ cpm	16
b) RCS Leakage Detection	1	1, 2, 3 & 4	Not Applicable	$10 - 10^6$ cpm	14
ii. Particulate Activity					
a) RCS Leakage Detection	1	1, 2, 3 & 4	Not Applicable	$10 - 10^6$ cpm	14
b. Control Room Ventilation Intake Duct Monitor	1	ALL MODES	$\leq 2 \times$ background	$10 - 10^6$ cpm	17

Note 1 - With fuel in the spent fuel pool or building

Note 2 - During purge or when ventilating during Mode 6 Core Alterations

TABLE 4.3-3

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
I. AREA MONITORS				
a. Spent Fuel Pool Area Monitor	S	R	M	Note 1
b. Containment High Range	S	R Note 4	M	1, 2, 3, & 4
PROCESS MONITORS				
a. Containment				
i. Gaseous Activity				
a) Purge & Exhaust Isolation	Note 2	R	Note 3	Note 5
b) RCS Leakage Detection	S	R	M	1, 2, 3, & 4
ii. Particulate Activity				
a) RCS Leakage Detection	S	R	M	1, 2, 3, & 4
b. Control Room Ventilation Intake Duck Monitor	S	R	M	ALL MODES

Note 1 - With fuel in the spent fuel pool or building.

Note 2 - Within 8 hours prior to initiating containment purge operations and at least once per 12 hours during containment purge operations.

Note 3 - Within 31 days prior to initiating containment purge operations and at least once per 31 days during containment purge operations.

Note 4 - Acceptable criteria for calibration are provided in Table II.F.1-3 of NUREG-0737.

Note 5 - During purge or when ventilating during Mode 6 core alterations.