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February 20, 1991

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U. S. Nuclear Regulatory Commission  
Document Control Des<sup>t</sup>  
Mail Station P1-137  
Washington, D. C. 20555

Subject: Arkansas Nuclear One - Unit 1  
Docket No. 50-313  
License No. DPR-51  
Technical Specifications Change Request  
Decay Heat Removal System Automatic  
Closure Interlock

Gentlemen:

Attached for your review and approval are proposed Technical Specification changes revising Technical Specification Table 4.1-1, Item 30 and Table 4.1-2, Item 11 for ANO-1. This change clarifies the wording of the surveillance requirement to avoid misinterpretation and clarifies the surveillance interval from once every 18 months to each refueling outage.

The proposed change has been evaluated in accordance with 10CFR50.91(a)(1) using the criteria in 10CFR50.92(c) and it has been determined that these changes involve no significant hazards considerations. The bases for these determinations are included in the enclosed submittal.

We request that the effective date for this change be 30 days after NRC issuance of the amendment to allow for distribution and procedural revisions necessary to implement this change.

Very truly yours,

NSC/lw  
Attachments

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STATE OF ARKANSAS    )  
                                  )  
COUNTY OF LOGAN    )            SS

AFFIDAVIT

I, N. S. Carns, being duly sworn, subscribe to and say that I am Vice President, Operations AND for Entergy Operations, Incorporated; that I have full authority to execute this affidavit; that I have read the document numbered ICAN029102 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 NO. DPR-51

ENTERGY OPERATIONS, INCORPORATED

ARKANSAS NUCLEAR ONE, UNIT 1

DOCKET NO. 50-313

### PROPOSED CHANGE

It is proposed that Technical Specification Table 4.1-1, Item 30, Remark Number 3 be changed to read "At least once every refueling shutdown, with Reactor Coolant System pressure greater than or equal to 200 psig but less than 300 psig, verify automatic isolation of the decay heat removal system from the Reactor Coolant System on high Reactor Coolant System pressure." The frequency "R" is being clarified as once every refueling shutdown for this specification in Table 4.1-2, Item 11.

### BACKGROUND

The current specification provides for surveillance testing of the decay heat removal system isolation valve automatic closure and interlock system as annotated in Remark (3). This note is currently written as follows, "shall also be tested during refueling shutdown prior to repressurization at a pressure greater than 300 but less than 420 psig." The two conditions "during refueling shutdown" and "greater than 300 psig" are mutually exclusive. Note 3 is associated with the monthly test but applies to the test performed during refueling shutdown conditions.

### DISCUSSION

This change is to correct the wording in the surveillance requirement to require the test to be performed when Reactor Coolant System pressure is greater than or equal to 200 psig. The change in value from 300 psig to 200 psig is in the conservative direction as the function of the interlock is to protect the low pressure piping from an overpressure condition. An upper limit of 300 psig is specified to ensure the test is performed within the design pressure of the piping (300 psig). This change will allow verification of valve stroke to be performed in conjunction with the test. The frequency of 18 months is to be specified as each refueling shutdown. This will allow the surveillance to be performed as intended and at the intended frequency. The verbiage to be inserted into the remarks is consistent with the Babcock and Wilcox Standard Technical Specifications. As the note applies to the refueling shutdown test not the monthly test, a separate test with Note 3 is provided for clarity. As ANO-1 is on an 18 month refueling outage schedule the change from once every 18 months to once every refueling shutdown is editorial in nature in Table 4.1-2, Item 11.

### 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 purpose of this interlock is to protect the low pressure piping of the decay heat removal system from pressure greater than design. This change to the specification ensures the design function of the Automatic Closure Interlock is maintained. The change to the test frequency is essentially the same frequency since ANO-1 is on an eighteen month fuel cycle. The test is to be performed at a more conservative value. Therefore, this change 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.

This change provides for a correction to the surveillance requirement to allow testing as intended. The frequency of the testing is still essentially the same. The design of the Automatic Closure Interlock to protect the low pressure piping from an overpressure condition is not changed by this Technical Specification change. Therefore, the possibility of a new or different kind of accident from any previously evaluated is not created.

Criterion 3 - Does Not Involve a Significant Reduction in the Margin of Safety.

With this change the requirement to perform the test once per refueling frequency is still being maintained. This change merely provides wording that is clear to enhance interpretation of the requirement. The test is to be performed at a value less than piping design pressure. Therefore, no significant reduction in the Margin of Safety is incurred.

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.