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November 26, 1982

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Director of Nuclear Reactor Regulation
ATTN: Mr. J. F. Stolz, Chief
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Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Director of Nuclear Reactor Regulation
ATTN: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
NRC Request for Technical Specification
Revision for Snubber Surveillance

Gentlemen:

Your September 21, 1982, letter (ØCNAØ982Ø9) stated that a license amendment application for ANO-1 & 2 to include mechanical snubber surveillance requirements was appropriate at this time for the following reasons:

1. The uncertainty of having acceptable code requirements for inservice inspection and testing of snubbers in the near future is not sufficient reason to delay the implementation of the current technology.
2. It may be several years before the ANSI Standards have been fully developed and approved by the American Society of Mechanical Engineers.
3. Such an extended delay in the implementation would be detrimental to the safety goal of assuring that the structural integrity of the reactor coolant system and all other related systems is maintained during and following a seismic or other event initiating dynamic loads.
4. NRC indicated that vendor efforts have produced suitable test equipment for use in the Testing Surveillance program.

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Mr. J. F. Stolz
Mr. R. A. Clark

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We understand your reasoning for requesting that AP&L submit revised Technical Specification changes for our snubber surveillance program in that NRC wants AP&L to incorporate appropriate changes, clarifications and improvements based on recent operating experiences at other facilities; and that waiting an extended period of time to take any needed action would not be in the best safety interests of the public if our current snubber surveillance program was truly inadequate.

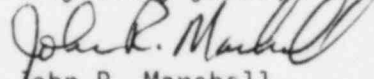
However, ANSI/ASME OM4-1982, "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints (Snubbers)", has received formal approval by the American Society of Mechanical Engineers Committee on Operation and Maintenance of Nuclear Power Plant Components and the American National Standards Institute. The date of issuance of this standard was October 31, 1982.

As discussed with NRC's Mr. Guy Vissing on November 22, 1982, this newly issued industry standard:

1. Establishes general requirements for periodic examination and testing of nuclear power plant equipment dynamic restraints (snubbers) from preservice inspection throughout the life of the plant;
2. Establishes inservice inspection intervals, criteria, and data requirements;
3. Is applicable to snubbers which effect a safety function; and
4. Is applicable to snubbers whose malfunction would significantly increase the probability of occurrence or the consequences of an accident or the malfunction of equipment important to safety.

We recognize that Mr. Vissing has certain reservations concerning OM4; however, we request a response extension to February 28, 1983, to review this newly approved ANSI Standard and assess its applicability to meeting the plant-specific snubber examination and performance testing needs for ANO-1 & 2. After receiving input from the engineering staff at ANO concerning ANSI/ASME OM4-1982, we feel that AP&L would be in a better position for assuring that proper consideration was given to this newly issued standard in making our response. We hereby commit to send NRC by February 28, 1983, our resolution to your September 21, 1982, request for revised Technical Specification changes for our snubber surveillance program at ANO.

Very truly yours,


John R. Marshall
Manager, Licensing

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