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February 5, 1991

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

Subject: Arkansas Nuclear One - Unit 2 Docket No. 50-368 License No. NPF-6 Long Term Hydrogen Monitoring Capabilities for ANO-2

Gentlemen:

On January 9, 1990 Entergy Operations requested a waiver of compliance (@CANØ19008) from the 30 minute time requirement of NUREG-0737 ltem II.F.1, Attachment 6. By letter dated November 30, 1990 (@CNA119022), the NRC issued a Safety Evaluation denying our request.

As indicated in our request for waiver of compliance, ANO-1 can meet the criteria. In order to meet this requirement for ANO*2 of having continuous indication and recording of hydrogen concentration within 30 minutes of the initiation of safety injection, modifications to the system will be required. Entergy Operations' process for system modifications like this includes the development of a project scoping report which identifies the objective, possible way of meeting that objective, including estimated costs and recommendations. The project is then prioritized, the design developed and reviewed by the capitol expenditure review board. As the review process and implementation is extensive and the next refueling outage is scheduled to begin February 22, 1991, it is not possible for Entergy Operations to implement a comprehensive design change during 2R8. Therefore, we propose to make the necessary modifications for ANO-2 prior to startup following the 2R9 refueling outage. The project scoping report for the necessary modifications will be completed by November 15, 1991. Following management review, the necessary modifications will be identified and conveyed to the Staff.

Entergy Operations considers this to be an acceptable time to complete the modifications as our current system provides the capability of providing a sample within 90 minutes of the initiation of safety injection. Based on figure No. 6.2-25 of the ANO-2 Safety Analysis Report, it will take approximately 72 hours before hydrogen concentration in the containment will reach 3% by volume. This assumes conservative hydrogen generation rates based on 10CFR50.44. Therefore, the current system design provides adequate capabilities until the necessary modifications can be made.

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Should you or your staff have questions regarding this response, please do not hesitete to call.

Very truly yours,

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Manager, Licensing

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