



ARKANSAS POWER & LIGHT COMPANY
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December 10, 1982

2CAN128206

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

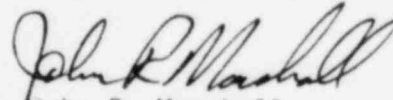
SUBJECT: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Request for Additional Information
Concerning the Inservice Testing
Program for Arkansas Nuclear One, Unit 2

Gentlemen:


Your letter dated November 19, 1982, (2CNA118204) stated that NRC has reviewed our June 15, 1978, submittal (2-068-17) which requested relief on certain items of the Inservice Testing Program for Arkansas Nuclear One, Unit 2. From this review, NRC determined the need for additional information which was identified in to your letter. AP&L's written response was requested by December 10, 1982.

Enclosed is our written responses per your November 19, 1982, request for information and clarification on the thirteen (13) remaining open items related to the Unit 2 Inservice Testing Program. For documentation purposes, this submittal represents our confirmation of several telephone conference calls between ANO, AP&L Licensing and the NRC staff on these items.

Very truly yours,


John R. Marshall
Manager Licensing

A001

JRM:DET:KLM:rd

Attachment

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MEMBER MIDDLE SOUTH UTILITIES SYSTEM

REQUEST FOR ADDITIONAL INFORMATION CONCERNING
THE INSERVICE TESTING PROGRAM FOR
ARKANSAS NUCLEAR ONE, UNIT 2

1. Are all Category E valves indicated in the IST program physically locked in position?

All Category E valves included in the IST program are physically locked in position.

2. Should the safety/relief valves that provide low temperature over-pressure protection for the RCS be included in the IST program and categorized C?

2PSV-4732 and 2PSV-4742 (LTOP Relief Valves) will be included in the IST program and will be listed as Category C valves.

3. Provide the analysis that demonstrates no compromise in safety for never full-stroke exercising check valves 2BS-5A and B.

These valves cannot be full flow-stroked with building spray flow since this would result in spraying down the Containment Building. In accordance with the NRC's position and the ASME Code Section XI, we will open and full-stroke these valves manually per the following schedule: both valves will be opened and full-stroked manually during the next refueling outage, 2R3. If both valves prove operable, we will then manually full-stroke one valve during each refueling outage, alternating between the two valves.

4. Provide the analysis that demonstrates no compromise in safety for never full-stroke exercising check valves 2BS-1A and B.

Due to the size and function of these valves, they are partial flow-stroked monthly but never full flow-stroked. Therefore, we will open and full-stroke these valves manually per the following schedule: both valves will be opened and full-stroked by hand during the next refueling outage, 2R3. If both valves prove operable, we will then manually full-stroke one valve during each refueling outage, alternating between the two valves.

5. How are check valves 2EFW-2A and B full-stroke exercised? What is the frequency of this testing?

Due to the nature of the system and the function these valves perform, a full flow-stroke of these valves would be detrimental to the chemistry of the secondary plant. Therefore, we will open and full-stroke these valves manually per the following schedule: one valve will be manually full-stroked during each refueling outage. We will alternate the inspections between the two valves each refueling outage.

This frequency was decided upon based on the results of an inspection which took place during the last refueling outage, 2R2, when both valves were disassembled and manually full-stroked. The valves were found to be fully operable and in excellent condition. Based on these results, we have adopted the one valve per refueling outage as a reasonable frequency to demonstrate operability.

6. Do valves 2MS-39A and B perform a safety function in the shut position?

As described in Section 10.3.3 of the Unit 2 Final Safety Analysis Report, these valves prevent flow between steam generators following a main steam line break upstream of the main steam isolation valves. Therefore, these valves do perform a safety function in the shut position for the referenced transient condition.

7. What is the exercising frequency for valve 2CV-1480 and 2CV-1481?

These valves are full flow-stroke exercised during cold shutdown conditions at the frequency specified in the ASME Code, Section XI, subsection IWV-3520(b).

8. What is the exercising frequency for valves 2CV-1541, 2CV-1542, 2CV-1543 and 2CV-1560?

These valves are full flow-stroke exercised during cold shutdown conditions at the frequency specified in the ASME Code, Section XI, subsection IWV-3520(b).

9. Provide the specific technical justification for not full-stroke exercising valves 2SI-27A and B and 2SI-28A and B during power operation and cold shutdown.

The hot leg injection check valves take their flow from the High Pressure Safety Injection (HPSI) header. HPSI system pressure is not great enough to overcome Reactor Coolant System normal operating pressure. Therefore, full flow-stroking at power is impossible.

Subjecting the RCS to HPSI system pressure during cold shutdown could result in overpressurizing the RCS at a low temperature. This could result in damage to RCS components. We will, therefore, full flow-stroke test these valves during each refueling outage while the reactor vessel head is removed.

10. What is the full-stroke exercising frequency for valves 2CV-4846, 2CV-4847, 2CV-4873 and 2CV-4950?

These valves are full flow-stroke exercised during cold shutdown conditions at the frequency specified in the ASME Code, Section XI, subsection IWV-3520(b).

11. Provide the analysis that demonstrates no compromise in safety for never full-stroke exercising check valves 2SI-15A, B, C and D.

We full flow-stroke these valves during each refueling outage.

12. Provide the analysis that demonstrates no compromise in safety for never full-stroke exercising check valves 2SI-16A, B, C and D.

In accordance with the NRC position and the ASME Code, Section XI, we will open and manually full-stroke all four valves during the next refueling shutdown, 2R3. If the valves prove operable, we will then open and manually full-stroke two of the valves each subsequent refueling outage, alternating among the four valves. This would result in testing each valve every other refueling outage.

13. Are all four valves 2SI-14A, B, C and D full-stroke exercised each cold shutdown?

No. These valves are full flow-stroke exercised during each refueling outage concurrent with the full flow-stroke test of 2SI-15A, B, C and D. (See response to Item 11).

In general, if means become available to adequately demonstrate full-stroking of valves without mechanical disassembly, we will consider substitution of these means for the mechanical disassembly described herein and elsewhere in our testing program.