



July 18, 1994

OCAN079402

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

Subject: Arkansas Nuclear One - Units 1 and 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6  
Records Storage Facility Commitment Change

Gentlemen:

Pursuant to 10CFR50.54(a)(3), Entergy Operations is submitting a proposed change to the Arkansas Nuclear One (ANO) Quality Assurance Manual Operations (QAMO). This proposed change results in a reduction of a previously approved commitment; therefore, Entergy Operations is requesting NRC approval prior to implementation.

The proposed commitment change will revise the required protection of records from "natural disasters such as winds, floods, or fires" from the more stringent four-hour fire rating and tornado protection recommended by ANSI N45.2.9-1974, Section 5.6 to a two-hour fire rating and wind protection required by ANSI/ASME NQA-1-1983, Supplement 17S-1, Section 4.4. A discussion of the commitment change pursuant to 10CFR50.54(a)(3)(ii) is provided in Attachment 1. The proposed QAMO change is provided in Attachment 2.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

*Sen*

Dwight C. Mims  
Director, Licensing

DCM/nbm  
Attachments

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*for Encl*

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## Attachment 1 Discussion of Proposed Change

### Proposed Change

The proposed change will revise the ANO commitment regarding the records storage facility from ANSI N45.2.9-1974, Section 5.6 to ANSI/ASME NQA-1-1983, Supplement 17S-1, Section 4.4.

### Reason for Change

The control of records at ANO is currently governed by our commitment to ANSI N45.2.9-1974 through the QAMO commitment to Regulatory Guide 1.88, Revision 2. It has been determined, and documented through the ANO condition reporting system, that the ANO records storage facility does not meet the requirements of ANSI N45.2.9-1974 (primarily the four-hour fire rating and tornado protection). ANO meets the dual storage requirement for all but four types of records - radiography, recorder charts, tapes that document surveillance testing, and hard copy documents that cannot be effectively reproduced. In the interim, ANO has established a roving fire watch for this area to compensate for the deficient four-hour fire rating.

ANO's existing records storage facility (vault) has a halon fire suppression system which remotely annunciates in the secondary and central alarm stations which are manned 24 hours a day due to security requirements. The walls, floor, and ceiling of the vault area itself are constructed primarily of non-combustible materials (i.e., concrete, masonry block walls and metal stud/sheetrock walls). The existing records, for the most part, are enclosed within metal storage cabinets. The original construction drawings/specifications required use of materials of a higher fire-resistance than normal construction (i.e., 25% void masonry blocks in lieu of standard blocks and fireproofing on supporting beams and columns).

The Design Engineering Department has evaluated ANO's current facility and determined that it cannot be upgraded to meet the current ANSI N45.2.9-1974 standard commitment, short of constructing a new building. However, the current records storage facility can be relatively easily upgraded to comply with the proposed ANSI/ASME NQA-1-1983 standard. The anticipated upgrades are to replace the existing east and south metal stud/sheetrock walls with a wall providing a two-hour U.L. fire rating, provide additional fireproofing on structural steel members in the ceiling of the vault area and on the structural steel columns/beams supporting the vault for the first floor up to the fifth floor, and verify proper fire-rated seals in and around penetrations through the walls, floor, and ceiling of the vault.

The proposed commitment change to the ANSI/ASME NQA-1-1983 standard primarily changes the four-hour fire rating requirement to two-hours and changes the tornado protection requirement to wind protection. Approval of this change will permit ANO to

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upgrade its records storage facility to comply with Supplement 17S-1, Section 4.4 of ANSI/ASME NQA-1-1983, yet at the same time result in a considerable savings to Entergy Operations.

The NRC has approved a similar change for the Beaver Valley Power Station on August 14, 1987. Beaver Valley's records storage facility was designed in accordance with ANSI/ASME NQA-1-1983, Supplement 17S-1, Section 4.4.

**Basis for Conclusion the Change Continues to Satisfy 10CFR50 Appendix B**

The Appendix B Criterion that is affected by this change is XVII which addressed certain operating records, the results of tests and inspections, and the necessity for retrievability, retention, location of stored records, and assigned responsibility. The proposed commitment change has no adverse impact on any of those requirements. ANO will continue to conform to the recommendations contained in ANSI N45.2.9-1974, Appendix A with respect to records retention.

ANSI N45.2.23  
(Section 2.3.1.3)

Certification of competence in engineering, sciences, or quality assurance specialties issued and approved by a State Agency, or National Professional or Technical Society, score two (2) credits.

ANO considers holders of NRC-issued Reactor Operator/Senior Reactor Operator License to comply with the requirements of the section and may award two (2) credits to those individuals.

R.G. 1.88  
(Section C)/  
ANSI N45.2.9

The requirements and guidelines for collection, storage, and maintenance of nuclear power plant quality assurance records that are included in ANSI N45.2.9-1974 are acceptable to the NRC staff and provide an adequate basis...

ANO is committed to meeting the requirements of ANSI/ASME NQA-1-1983, Supplement 17S-1, Section 4.4 in lieu of ANSI N45.2.9-1974, Section 5.6 for record storage facilities.



**Entergy  
Operations**

Arkansas Nuclear One

QA MANUAL OPERATIONS

SECTION: TABLE 1

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