



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO PROPOSED SHUTDOWN MARGIN DEFINITION

FACILITY OPERATING LICENSE NO. NPF-6

ENERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT NO. 2

DOCKET NO. 50-368

1.0 INTRODUCTION

By letter dated July 22, 1993, as supplemented by letter dated October 20, 1993, Entergy Operations, Inc. (the licensee) submitted a request for changes to the Arkansas Nuclear One, Unit No. 2 (ANO-2) Technical Specifications (TSs). The requested changes would remove the cycle-specific variables from the TSs and control them under a new document called the Core Operating Limits Report (COLR), in accordance with Generic Letter (GL) 88-16. The proposed amendment would also revise the definition of shutdown margin (SDM) in Technical Specification 1.13 to achieve consistency with NUREG-1432, Revision 0, "Revised Standard Technical Specifications (RSTS) for CE (Combustion Engineering) Plants. The request to change the SDM definition is unrelated to GL 88-16, and is the subject of this evaluation.

2.0 EVALUATION

The licensee's proposed revision to the definition of SDM is denied because the licensee did not propose all portions of the SDM definition in NUREG-1432, Revision 0, "Revised Standard Technical Specifications for CE Plants" (hereafter referred to as the RSTS). Specifically, the licensee did not include the RSTS statement, "In Modes 1 and 2, the fuel and moderator temperatures are changed to the nominal zero power design level." The licensee's reason for not including this portion, as discussed in the application, is that this RSTS statement is not applicable to the ANO-2 SDM calculation method, and that another specification verifies the SDM in Modes 1 and 2 by verifying that the CEA group withdrawal is within the transient insertion limits.

The staff position is that the above RSTS statement is applicable and is needed to accurately define the starting point for SDM. The verification of the CEA group withdrawal assists in ensuring the SDM is met, however, the staff is of the opinion that how SDM is met and the definition of SDM are two different concepts that should be separated.

Similarly, the licensee did not include the RSTS statement, "There is no change in part length CEA position." In the application, the licensee offered no reason for not including this statement. The staff position is that this statement is also necessary to accurately define the starting point for the SDM definition.

3.0 CONCLUSION

The staff is denying the proposed SDM definition because it did not accurately define the starting point for SDM.

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Date: April 20, 1994