



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 175 TO

FACILITY OPERATING LICENSE NO. DPR-51

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT NO. 1

DOCKET NO. 50-313

1.0 INTRODUCTION

By letter dated November 8, 1994, Entergy Operations, Inc. (the licensee), submitted a request to change the Arkansas Nuclear One, Unit No. 1 (ANO-1) technical specifications (TSs). The requested change revises the TS section that describes when containment integrated leak rate tests (ILRTs) should be performed. The existing specification paraphrases ILRT frequency requirements that are contained in 10 CFR Part 50, Appendix J. The proposed change references 10 CFR Part 50 Appendix J rather than paraphrasing the requirements. In paraphrasing Appendix J, the existing TS introduced a subtle difference in testing frequency requirements. The difference between the TS and Appendix J wording became apparent during preparations for refueling outages 12 and 13. By referencing Appendix J rather than paraphrasing the requirements, a source of confusion is removed from TS requirements related to when ILRTs should be performed.

2.0 EVALUATION

Governing regulations related to ILRT requirements are contained in 10 CFR Part 50, Appendix J. Section III.D of Appendix J addresses the ILRT (type A test) periodic retest schedule and states: "After the preoperational leakage rate tests, a set of three Type A tests shall be performed, at approximately equal intervals during each 10-year service period. The third test of each set shall be conducted when the plant is shutdown for the 10-year plant inservice inspections."

The ANO-1 TS, Section 4.4.1.1.4 paraphrases Appendix J and states: "After the initial preoperational leakage rate test, a set of three integrated leak rate tests shall be performed at approximately equal intervals during each 10-year service period. The test may coincide with the plant inservice inspection shutdown periods." The subtle difference in wording between Appendix J and the TS is in the second sentence. Appendix J states that the third test shall be conducted when the plant is shutdown for the 10-year plant inservice inspection. The TS states that the test may coincide with the plant inservice inspection shutdown periods.

The difference in wording has been innocuous until planning commenced for the 12th and 13th refuelings that are scheduled for 1995 and 1996. If Appendix J requirements were followed, an ILRT would be required during the 12th refueling outage to comply with the requirement for equally spaced ILRTs during each 10-year service period. A second ILRT would be required during the 13th refueling outage to comply with the requirement for the third test of the set to be performed when the plant is shutdown for the 10-year inservice inspection.

The licensee requested an exemption from the Appendix J scheduler section to delete the requirement for two ILRT's in two successive years. The regulations never intended licensees to perform ILRTs on successive years. NRC is responding to the exemption request by separate correspondence.

In the course of reviewing ILRT related requirements, the licensee noted the wording discrepancy between Appendix J and the TS. The proposed amendment deletes the ILRT frequency description from the TS and in its place, references Appendix J requirements. The TS amendment also includes a statement that the ILRT frequency may be modified by exemption.

We have reviewed the proposed changes and conclude that they are administrative in nature and do not impact plant safety or operations. The proposed changes are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Arkansas State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (60 FR 502). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such

activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: George Kalman

Date: February 6, 1995