



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 121 TO

FACILITY OPERATING LICENSE NO. NPF-6

ENTERGY OPERATIONS, INC.,

ARKANSAS NUCLEAR ONE, UNIT NO. 2

DOCKET NO. 50-368

1.0 INTRODUCTION

By letter dated May 9, 1991, Entergy Operations, Inc. (the licensee) submitted a request for changes to the Arkansas Nuclear One, Unit No. 2 (ANO-2) Technical Specifications (TS). The requested change would revise TS 3.6.3.1 on containment isolation valves. The proposed change deletes the requirements of TS 3.0.4 on mode changes, when the action statements that allow continued operation for an unlimited period of time are met. The proposed amendment is based on the recommendations provided by the staff in Generic Letter (GL) 87-09 related to the applicability of limiting conditions for operations (LCO) of TS 3.0.

2.0 EVALUATION

On March 31, 1991, as a follow-up to IE Information Notice 88-73, "Direction-Dependent Leak Characteristics of Containment Purge Valves," the licensee discovered that the valve body for each of the inboard containment purge isolation valves were oriented in a direction which is less likely to seal when pressurized from the containment side. These valves are currently isolated by at least one deactivated automatic valve. A Temporary Waiver of Compliance from the provisions of TS 3.0.4 for the inboard containment purge valves, noted in TS Table 3.6-1, was granted by the staff by letter dated April 10, 1991, for a duration of 120 days in order to allow the processing of a TS amendment request. The proposed TS amendment would delete the requirements of TS 3.0.4 for the containment isolation valves in TS 3.6.3.1 to allow restart from a shutdown condition should the valves be inoperable, but action statements are met that allow continued operation for an unlimited period of time.

The action required with one or more of the isolation valve(s) specified in TS Table 3.6-1 inoperable is to maintain at least one isolation valve OPERABLE in each affected penetration that is open and either:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours; or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position; or

- c. Isolate the affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

If action a, b or c is met, plant operation may continue. Currently there are no exceptions from TS 3.0.4 for this TS. The wording of ANO-2 TS 3.0.4 precludes entry into an OPERATIONAL MODE or other specified applicability condition unless the conditions of the LCO are met without reliance on provisions contained in the ACTION statements.

The application of TS 3.0.4 in this case unduly restricts ANO-2's operation when conformance with the action requirements provides an acceptable level of safety for continued operation. As a result, the licensee proposes to allow exceptions from the provisions of TS 3.0.4 as it applies to TS 3.6.3.1 provided action statements are met that allow continued operation for an unlimited period of time.

The change proposed by the licensee has been reviewed considering the limitations set forth in GL 87-09 for TS 3.0.4. GL 87-09 recognizes, in part, that Specification 3.0.4 unduly restricts facility operation when conformance to the Action Requirements provides an acceptable level of safety for continued operation in any mode. For an LCO that has Action Requirements permitting continued operation for an unlimited period of time, entry into an operational mode or other specified condition of operation should be permitted in accordance with those Action Requirements. The restriction on change in operational modes or other specified conditions should apply only where the Action Requirements establish a specified time interval in which the LCO must be met or a shutdown of the facility would be required or where entry into that operational mode would result in entry into an Action Statement with such constraints. However, nothing in the staff position stated in GL 87-09 should be interpreted as endorsing or encouraging plant startup with inoperable equipment. The GL 87-09 itself states that startup with inoperable equipment should be the exception rather than the rule.

The proposed amendment is intended to address the immediate concerns of the Temporary Waiver of Compliance issued on April 10, 1991. In addition, the staff understands that the licensee will submit a permanent TS amendment request, fully implementing GL 87-09, in order to avoid similar situations in the future. Based on review of the licensee's proposal, we find the partial exception proposed in response to GL 87-09 to be 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 and changes in surveillance requirements. 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 (56 FR 27043). 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.

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Date: July 15, 1991