

ARKANSAS POWER & LIGHT COMPANY POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000 September 28, 1983

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Director of Nuclear Reactor Regulation ATTN: Mr. J. F. Stelz, Chief Operating Reactors Branch #4 Division of Licensing U. S. Nuclear Regulatory Commission Washington, DC 20555

Director of Nuclear Reactor Regulation
ATTN: Mr. James R. Miller, Chief
Operating Reactors Branch #3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Environmental Qualification Deadline Request for Extension

Gentlemen:

In our response to the submittal requirements of 10CFR50.49 (the environmental qualification rule), we requested an extension to the qualification deadline for a few pieces of equipment at ANO-2 (see our letter dated May 20, 1983, ØCANØ58311). The purpose of this letter is to update you regarding our request for deadline extension by providing additional information concerning the specific items.

In our previous letter, we reported that extensions were necessary on five items. We are now pleased to report that an extension will not be necessary on item 2 (Limitorque operator) or item 5 (limit switches); therefore, we withdraw our request with respect to these devices. A detailed description of each item is provided below.

 2C-143 Terry Steam Turbine Control Panel and 2SE-0336B-2 Turbine Speed <u>Sensor</u> - At the time of our previous submittal, AP&L was still discussing our possible involvement in a Terry Corp. qualification program for a new control panel; however, it was subsequently

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determined that the ANO environment conditions would not be enveloped. Therefore AP&L is now actively pursuing relocation of the control panel to a mild environment. It appears that the panel can be relocated; however, the changes may not be completed during this outage. Based on the latest scheduling information, we believe the panel relocation can be completed during the first outage of sufficient duration following the current refueling outage. The speed sensor is shaft mounted and therefore cannot be relocated. However, we have recently confirmed that the speed sensor is identical to one previously tested by Wyle Labs for Terry Corporation. The test report indicates that an identical device was subjected to 212°F, 2 psig, and 100% RH for six hours whereas the postulated conditions at ANO reach a peak of 214°F. However, since the total postulated exposure time to elevated temperature for ANO is less than one hour and the difference in temperature is only 2°F, we believe the testing is adequate to qualify the device for its postulated environment. A more detailed justification will be performed and placed in the EQ files. Therefore, an extension to the qualification deadline is no longer needed for the speed sensor.

- 2. 2CV-4698-1, Limitorque Operator AP&L has continued the efforts to qualify this device by obtaining a materials breakdown from the manufacturer. Applicable type test data qualifies this component to all parameters except radiation; therefore, by the performance of a materials analysis AP&L was successful in establishing full qualification for this component. We therefore withdraw our request for an extension for this item.
- 3. 2PIS-0789-1 and 2PIS-0795-2, Barton Pressure Switches In our previous letter, we indicated that Barton was engaged in a qualification program for pressure switches. The test report is scheduled to be completed by January 1924, at which time AP&L will determine whether to purchase and install the Barton device or another qualified substitute. AP&L's current plans are to install qualified Static-O-Ring switches if the Barton qualification results are not acceptable. The switches can be procured with reasonably short lead times and installed during the first outage of sufficient duration. Typically, a relatively short outage will suffice to allow installation of these switches.
- 4. 2TE-4610-1 thru 4, -4611-1 thru 4, -4710-1 thru 4, -4711-1 thru 4, Rosemount RTD's The status of these devices is still as described in our previous letter.
- 5. 2ZS-1403-1, Microswitch Limit Switch; 2ZS-2061-2 and 2201-2, Namco Limit Switch; and 2ZS-4847, Masoneilan Limit Switch Based on further engineering evaluation and systems analysis, we have determined that the above items either do not preform an essential safety function or perform their functions in a mild environment. Therefore, an extension to the deadline is not required. Accordingly, we withdraw our request.

We indicated in our previous letter that delivery of four Emergency Feedwater Valves (2CV-1036-1, -1037-2, -1038-1, -1039-2) was very tight regarding replacement in the upcoming outage and that any delays would require us to request an extension. Although the delivery schedule has not slipped, the outage window has been advanced due to excellent unit performance since the last refueling. The original start date of January

1984 has been advanced to mid-October 1983. Since the valve delivery will not be made until mid-December, sufficient outage time may not be available to perform the modification. We still intend to make every effort to complete the modification. However, due to the uncertainties now involved, we believe a request for deadline extension is appropriate. If the modification cannot be completed during this outage, it will be made at the first outage of sufficient duration. Due to the nature of the changes, a rather lengthy outage would be required.

We also request an extension for the Bypass Damper Motors (and position switches). Upon receipt of an Engineered Safeguards signal, these fractional horsepower motors rotate a cam which allows a weighted damper to close. This diverts air flow from a chilled water coil and filter to a service water coil for containment cooling. Although the current motors were installed to satisfy NRC qualification concerns in late 1978, they do not fully meet the more rigorous requirements of Bulletin 79-01B. Based on the concerns outlined in the recent NRC Safety Evaluation Report, AP&L has undertaken to replace the motors and switches. Preliminary procurement schedules indicated that the equipment could be obtained and installed during the upcoming outage; therefore, a deadline extension was not requested. However, subsequent feedback from AP&L QA personnel indicated that since we had not previously qualified this vendor (Namco), they were not on the AP&L Qualified Vendor List (QVL). Since the process of placing Namco on the QVL could involve unknown procurement delays, AP&L opted to purchase the switches through an approved vendor with a firm delivery date. In any case, the special handling will push the delivery schedule back from original estimates. This, in addition to the advance of the outage dates, will possibly preclude installation of the motors and switches during the upcoming outage. We therefore request extension of the qualification deadline for these devices (2UCD-8203-1, -8209-1, -8216-2, -8222-2; 2ZS-8203-1, -8204-1, -8209-1, -8210-1, -8216-2, -8217-2, -8222-2, and -8223-2).

The justifications for continued operation for the above devices were submitted by AP&L letter ØCANØ28211 dated February 27, 1982, except for the Rosemount RTD's which were submitted by AP&L letter 2CANØ6831Ø dated June 20, 1983.

The following is a summary of all affected items:

Item		Status
1.	2C-143 Terry Turbine Controls	Extension requested to March 31, 1985
2.	2CV-4698-1 Limitorque Operator	Request withdrawn
3.	2PIS-0789-1, -0795-2 Barton Pressure Switches	Extension requested to March 31, 1985
4.	2TE-4610, etc. Rosemount Hot Leg RTD's	Extension requested to March 31, 1985
5.	2ZS-1403-1, etc. Limit Switches	Request withdrawn
6.	2CV-1036-1, -1037-2, -1038-1 -1039-2, EFW Valves	Extension requested to March 31, 1985
7.	2UCD-8203-1, -8209-1, -8216-2 -8222-2, Bypass Damper Motors and Switches	Extension requested to March 31, 1985

We request that the NRC contact us as soon as possible regarding our requests. We will work closely with the NRC to resolve any concerns you may have.

Very truly yours

John R. Marshall Manager, Licensing

JRM: CT: s1