



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 158 AND 132 TO

FACILITY OPERATING LICENSE NOS. DPR-51 AND NPF-6

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT NOS. 1 AND 2

DOCKET NOS. 50-313 AND 50-368

1.0 INTRODUCTION

By letter dated October 15, 1991, as supplemented March 13, 1992, Entergy Operations, Inc. (the licensee), submitted a request for changes to the Arkansas Nuclear One, Units 1 & 2 (ANO 1&2), Operating License (OL) and Technical Specifications (TSs). The requested changes would add the NRC's standard Operating License Condition (OLC) noted in Generic Letter 86-10. In addition, the proposed changes would move requirements for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements, as recommended by Generic Letter 88-12 from the TSs, to the respective Safety Analysis Reports (SARs) verbatim. The proposed OLC would reference the NRC-approved Fire Protection Program in the SAR and allow changes to this program provided the changes would not adversely affect fire protection effectiveness. The proposed changes would also modify the administrative control requirements of the TSs to add requirements for the Fire Protection Program that are similar to requirements for other programs implemented by a license condition. The new requirement would be added to TS 6.0, "Administrative Controls," requiring the Plant Safety Committee (PSC) to review changes to the approved Fire Protection Program. Guidance on these proposed changes to TSs was provided to all power reactor licensees and applicants by Generic Letter 88-12, dated August 2, 1988.

The additional information contained in the supplemental letter dated March 13, 1992, was clarifying in nature and, thus, within the scope of the initial Federal Register notice and did not affect the staff's proposed no significant hazards consideration determination.

2.0 EVALUATION

The proposed changes to the fire protection OLC and TSs are consistent with the guidance in NRC Generic Letter 86-10, "Implementation of Fire Protection Requirements," and NRC Generic Letter 88-12, "Removal of Fire Protection Requirements from Technical Specifications." These generic letters recommended that the appropriate fire protection TSs be removed from the TSs and incorporated into the SAR for the facility. Although a comprehensive Fire Protection Program is essential to plant safety, the basis for the recommendation is that many details of this program that are currently addressed in the TSs can be modified without affecting nuclear safety. These details, that are presently included in TSs and which are removed by this amendment, do not constitute performance requirements necessary to ensure safe operation of the facility

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and, therefore, do not warrant being included in TSs. At the same time, suitable administrative controls ensure that there will be careful review and analysis by competent individuals of any changes in the Fire Protection Program to ensure that nuclear safety is not adversely affected. These controls include: (1) the TSs administrative controls that are applicable to the Fire Protection Program; (2) the licensee condition on implementation of, and subsequent changes to, the Fire Protection Program; and (3) the 10 CFR 50.59 criteria for evaluating changes to the Fire Protection Program as described in the SAR. The generic letters also recommended that the specific revision of the SAR which incorporated the Fire Protection Program and the staff's specific safety evaluation report which approved the Fire Protection Program be referenced in a new OLC.

The specific details relating to fire protection requirements removed from the TSs by this amendment include those specifications for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements. The administrative control requirements already include Fire Protection Program implementation as an element for which written procedures must be established, implemented, and maintained. The audit responsibilities of the PSC were expanded to include the review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the General Manager, Plant Manager, Plant Operations and Safety Review Committee.

The proposed fire protection OLC 2.C.(8) and 2.C.(3)(b) for Unit 1 and Unit 2, respectively, states:

"EOI shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in Amendment 9A to the Safety Analysis Report and as approved in the Safety Evaluation dated March 31, 1992, subject to the following provision:

The licensee may make changes to the approved Fire Protection Program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of fire."

The TS changes proposed by the licensee are in accordance with guidance provided by Generic Letter 88-12, as addressed in the items below:

#### Unit 1

Specification 3.5.5, Fire Detection Instrumentation, its associated Surveillance Requirements, and Bases were removed.

Table 3.5-5, Safety-Related Areas Protected By Heat/Smoke Detectors, was removed.

Specification 3.17, Fire Suppression Water System, its associated Surveillance Requirements, and Bases were removed.

Specification 3.18, Fire Suppression Sprinkler System, its associated Surveillance Requirements, and Bases were removed.

Specification 3.19, Control Room and Auxillary Control Room Halon Systems, its associated Surveillance Requirements, and Bases were removed.

Specification 3.20, Fire Hose Stations, its associated Surveillance Requirements, and Bases were removed.

Specification 3.21, Fire Barriers, its associated Surveillance Requirements, and Bases were removed.

Administrative Controls Specification 6.5.1.2, Composition, Additional Requirements, Item 5, regarding fire brigade staffing, was removed.

Administrative Controls Specification 6.5.1.6, Responsibilities, Item 1, regarding review of changes to the Fire Protection Program, was added.

#### Unit 2

Specification 3.3.3.8, Fire Detection Instrumentation, its associated Surveillance Requirements, and Bases were removed.

Table 3.3-11, Fire Detection Instruments, was removed.

Specification 3/4.7.10, Fire Suppression Water System, Fire Suppression Spray and/or Sprinkler System, Fire Hose Stations, its associated Surveillance Requirements, and Bases were removed.

Table 3.3-7, Fire Hose Stations, was removed.

Specification 3/4.7.11, Fire Barriers, its associated Surveillance Requirements, and Bases, were removed.

Administrative Controls Specification 6.2.2, Facility Staff, Item f, regarding fire brigade staffing, was removed.

Administrative Controls Specification 6.4.2, regarding a training program for fire brigade staff, was removed.

Administrative Controls Specification 6.5.1.7, Responsibilities, Item 1, regarding review of changes to the Fire Protection Program, was added.

By letter dated October 25, 1991, the licensee confirmed that the NRC-approved Fire Protection Program has been incorporated into the SAR as required by Generic Letter 86-10. The licensee also confirmed that the operational conditions, remedial actions, and test requirements associated with the removed fire protection ISs have been included in the Fire Protection Program and incorporated into the SAR. This is in accordance with the guidance of Generic Letter 88-12.

On the basis of its review of the above items, the staff concludes that the licensee has met the guidance of Generic Letter 88-12. Therefore, the staff finds the proposed changes 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 comment.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change 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 amendments involve 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 amendments involve no significant hazards consideration and there has been no public comment on such finding (56 FR 60116). Accordingly, the amendments meet 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 amendments.

### 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Steve Ruffin  
Thomas Dunning  
Thomas Alexion  
Sheri Peterson

Date: March 31, 1992