

ENCLOSURE

PROPOSED TECHNICAL SPECIFICATION

AND

RESPECTIVE SAFETY ANALYSES

IN THE MATTER OF AMENDING

LICENSE NOS. DPR-51 AND NFP-6

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNITS ONE AND TWO

DOCKET NOS. 50-313 AND 50-368

DESCRIPTION OF PROPOSED CHANGE

The ANO-1 proposed change revises Specification 3.5.1.13 to include separate measurement ranges for the Triaxial Time-History Accelerographs (0.01-1.0g), the Triaxial Peak Accelerographs (0.05-1.0g), and for the Triaxial Response Spectrum Recorders (2-25.4 Hz). Additionally, Channel Description 42.b.1 in Table 4.1-1 is revised to provide the correct component nomenclature; 2XR-8347.

The ANO-2 proposed change affects TS Table 3.3-7 of Specification 3/4.3.3.3. Table 3.3-7 Item 2.a, "Triaxial Peak Accelerograph - 2XR-8347, Containment Base Slab, Elev. 336'6", currently has a stated Measurement Range of "0.01-1.0g." This Measurement Range is requested to be changed to "0.05-1.0g," consistent with the measurement range for the other Peak Accelerographs of identical design in this Table.

BACKGROUND

In September 1991, a discrepancy concerning the measurement range specified in the ANO-2 TS for Triaxial Peak Accelerograph 2XR-8347, Containment Base Slab, was identified. Specifically the range specified for this instrument in ANO-2 TS Table 3.3-7, Item 2.a, is 0.01-1.0g. However, a review of the instrument design and technical documents provides the actual measurement capability as 0.05-1.0g. This range is correctly specified in this TS Table for two other triaxial peak accelerographs (2XR-8348 and 2XR-8349) which are of identical design to the 2XR-8347 instrument of concern.

The resultant investigation has shown this to be a typographical error in the TS issued with the original ANO-2 operating license in July 1978. This error has remained undetected until the recent discovery. The measurement range for each of these triaxial peak accelerographs was submitted to the NRC with the initial markup of the CE-STs on March 23, 1976, as 0.05-1.0g. On issuance of the TS with the ANO-2 operating license, the measurement range for 2XR-8347 was listed as 0.01-1.0g. This matched the range for the triaxial time-history accelerographs listed in Table 3.3-7, just above the peak accelerographs, and not the correct range for the specified instrument. No indication of NRC technical disagreement with the initially submitted range has been identified. The typographical error has gone undetected since that time.

This matter was discussed via phone with the ANO-2 NRR Project Manager on September 30, 1991. In subsequent conversation, after investigation on the part of the NRR project Manager, it was agreed that the intent of the specification was not to require a more sensitive instrument than was originally installed in the plant.

ANO-1 TS 3.5.1.13 contains a description of the minimum measurement range for different types of seismic monitoring instrumentation. The "minimum" measurement range also refers to the same Triaxial Peak Accelerographs as described above for ANO-2. The actual measurement range for these instruments is, as stated above, 0.05-1.0g. Additionally, when these instruments were included (Amendment 135), a typographical error also occurred in specifying the component number for Table 4.1-1 item 42.b.1.

DISCUSSION

As stated in the ANO-2 FSAR (section 3.7.4.1), the seismic instrumentation which was installed at ANO-2 conforms to AEC Regulatory Guide 1.12 dated March 10, 1971 (also known as "Safety Guide" 1.12). The NRC staff concurred and stated their acceptance in section 3.7.3 of the ANO-2 SER. The NRC also found these instruments acceptable in the September 13, 1990, SER approving these instruments' inclusion in ANO-1 TS Section 3.5.1.

In summary, the proposed changes are necessary to correct typographical errors and eliminate potential misinterpretation of the requirements. The result will be Technical Specification requirements which meet the original intent, are consistent with plant design, and conform to NRC guidance.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

An evaluation of the proposed changes has been performed in accordance with 10CFR50.91(a)(1) regarding no significant hazards consideration using the standards in 10CFR50.92(c). A discussion of those standards as they relate to this amendment request follows:

Criterion 1 - Does Not Involve A Significant Increase in the Probability or Consequences of An Accident Previously Evaluated

Accident mitigation features of ANO-1 or ANO-2 do not involve seismic monitoring instrumentation. Furthermore, this proposed change does not affect the design or operability requirements of this instrumentation. Therefore, this proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2 - Does Not Create the Possibility of a New or Different Kind of Accident from Any Previously Evaluated

The proposed changes correct an editorial deficiency and does not involve any design changes, plant modifications, changes in acceptance criteria or changes in plant operation. Seismic monitoring instrumentation is not identified as an initiator of any event, nor is it identified as a mitigator in any event, and therefore, can not create the possibility of a new or different kind of accident from any previously evaluated.

Criterion 3 - Does Not Involve A Significant Reduction in the Margin of Safety

The design, function, and operability requirements for the seismic monitoring instrumentation remains unaffected by these proposed changes. Additionally, this instrumentation does not provide any protective function and is not associated with any "margin of safety." Therefore, these proposed changes do not involve a significant reduction in the margin of safety.

The Commission has provided guidance, in 51 FR 7750 on March 6, 1986, concerning the application of these 10CFR50.92 standards by providing examples of amendments which are likely to involve no significant hazards considerations. The proposed amendment most closely matches example B.(i) from this guidance: "A purely administrative change to TS: for example, a change to achieve consistency throughout the TS, correction of an error, or a change in nomenclature."

Therefore, based on the reasoning presented above and the previous discussion of the amendment request, Entergy Operations, Inc. has determined that the requested changes do not involve a significant hazards consideration.

ANO-1 TECHNICAL SPECIFICATION

PROPOSED CHANGED PAGES

3.5.1.13 The Seismic Monitoring Instrumentation shall be operable with a minimum measurement range of 0.01 - 1.0 g for Triaxial Time - History Accelerographs, 0.05 - 1.0 g for Triaxial Peak Accelerographs, and 2-25.4 Hz for Triaxial Response Spectrum Recorders.

Table 4.1-1 (Cont.)

<u>Channel Description</u>	<u>Check</u>	<u>Test</u>	<u>Calibrate</u>	<u>Remarks</u>
b. Triaxial Peak Accelerographs				
1. 2XR-8347, Unit 2 Containment Base Slab, Elev. 336'6"	NA	NA	R	
2. 2XR-8348, Unit 2 Primary Shield O/S Reactor Cavity, Elev. 366'3"	NA	NA	R	
3. 2XR-8349, Unit 2 Tr. of Containment, Elev. 531'6"	NA	NA	R	
c. Triaxial Response-Spectrum Recorders				
1. 2XR-8350, Unit 2 Containment, Base Slab, Elev. 335'6" (O/S Containment)	NA	R	R	
43. ESAS Manual Trip Functions				
a. Switches & Logic	NA	R	NA	
b. Logic	NA	M	NA	
44. Reactor Manual Trip	NA	P	NA	
45. Reactor Building Sump Level	NA	NA	R	
46. EFW Flow Indication	M	NA	R	

ANO-2 TECHNICAL SPECIFICATION

PROPOSED CHANGE PAGES

TABLE 3.3-7

SEISMIC MONITORING INSTRUMENTATION

<u>INSTRUMENTS AND SENSOR LOCATIONS</u>	<u>MEASUREMENT RANGE</u>	<u>MINIMUM INSTRUMENT OPERABLE</u>
1. Triaxial Time-History Accelerographs		
a. ACS-8001, Unit 1 Containment Base Slab, Elev. 335'6"	0.01-1.0g	1
b. ACS-8002, Unit 1 Top of Containment, Elev. 531'6"	0.01-1.0g	1
2. Triaxial Peak Accelerographs		
a. 2XR-8347, Containment Base Slab, Elev. 336'6"	0.05-1.0g	1
b. 2XR-8348, Primary Shield O/S Reactor Cavity, Elev. 366'3"	0.05-1.0g	1
c. 2XR-8349, Top of Containment, Elev. 531'6"	0.05-1.0g	1
3. Triaxial Response-Spectrum Recorders		
a. 2XR-8350, Containment Base Slab, Elev. 335'6" (O/S Containment)	2-25.4 Hz	1

*With Unit 1 control room indication/or alarm