ARKANSAS POWER & LIGHT COMPANY
FIRST COMMERCIAL BUILDING/P.O. BOX 551/LITTLE ROCK, ARKANSAS 72203/(501) 371-4422

October 9, 1984

JOHN M. GRIFFIN
Senior Vice President
Energy Supply

1CAN108401

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

SUBJECT: Arkansas Nuclear One - Unit 1
Docket No. 50-313
License No. DPR-51
Proposed Technical Specifications Involving
Hydrotesting of the Secondary System

Gentlemen:

During the upcoming ANO-1 sixth refueling outage, AP&L is scheduled to perform a 10 year hydrostatic test on the ANO-1 steam system. This hydrostatic test is required by Section XI of the ASME Boiler and Pressure Vessel Code which ANO-1 is committed to by Section 4.0 of the ANO-1 Technical Specifications. The hydrostatic test will be performed using steam as the pressurizing medium as allowed by the 1980 edition of the ASME code. Steam was chosen as the pressurizing medium as it will not require additional supports for the steam lines. The use of water as the pressurizing medium would require additional supports due to the added weight. The heat required to create the steam will be produced by operation of the reactor coolant pumps. The required test pressure is 1.25 times the system design pressure. Therefore, in order to perform this test fourteen of the steam safety valves must be gagged and the remaining two safety valves reset as the current setpoints are below the required test pressure. The two operable safety valves will be reset at a value above the test pressure but low enough to provide overpressure protection. However, Section 3.4.1.2 of the ANO-1 Technical Specifications requires that fourteen of the steam system safety valves must be operable to heat the reactor above

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280°F. The basis for this Technical Specification is that sufficient safety valves are operable to dissipate the energy generated at the reactor high power level trip setting. In the hydrostatic test a smaller amount of energy is created, therefore sufficient relief capacity will exist with only two of the safety valves operable. Thus, we are proposing a change that would allow the gagging of the safety valves for the hydrostatic test.

In accordance with 10CFR50.92(c), we have determined the proposed amendment to have no Significant Hazards Consideration (SHC) and are including the basis of our SHC determination as an attachment to the proposed change. Also, a copy of this amendment package is being forwarded to Mr. E. Frank Wilson, Director, Division of Environmental Health, State of Arkansas.

Although the circumstances of this amendment are not exigent or emergency we request a prompt review. This is requested as these changes will be required for the hydrostatic test of the secondary system which is currently scheduled for approximately December 17, 1984.

Pursuant to 10CFR170.12(c), we are including payment in the amount of $150 for the processing of this amendment.

Very truly yours,

John M. Griffin

JMG/MCS/ac

Attachments

cc: Mr. E. Frank Wilson, Director
Division of Environmental Health Protection
State Department of Health
4815 West Markham Street
Little Rock, AR 72201

STATE OF ARKANSAS)
) SS
COUNTY OF PULASKI)

I, John M. Griffin, being duly sworn, subscribe to and say that I am Sr. Vice President of Energy Supply for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 1CAN108401 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

John M. Griffin

JOHN M. GRIFFIN

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 9th day of October, 1984.

Sharon Kaye Hendrix

Notary Public

My Commission Expires:

9-19-89

DESCRIPTION OF AMENDMENT REQUEST

As required by Section XI of the ASME Boiler and Pressure Vessel Code and Section 4.0 of the ANO-1 Technical Specifications, AP&L is scheduled to perform a hydrostatic test on the steam system of ANO-1 during the sixth refueling outage. The hydrostatic test will be performed using steam as the pressurizing medium as allowed by the 1980 edition of the ASME code. The heat required to create the steam will be produced by operation of the reactor coolant pumps. In order to perform this test, fourteen of the steam system safety valves must be gagged for the duration of the test. Therefore, AP&L is proposing Technical Specifications that will allow this.

BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Although this amendment does not exactly match any of the examples provided by the Commission (ref: DLOP 228, Federal Register, Vol. 48, p. 14870), it does not involve a Significant Hazards Consideration. This amendment allows hydrostatic testing of the steam system which is required by Section XI of the ASME Boiler and Pressure Vessel Code. This test will show that a margin of safety exists in the pressure boundary of the steam system.

Fourteen of the sixteen steam safety valves are required to be operable when the reactor is above 280°F in order that the energy generated at the reactor high power level trip setting can be dissipated. However, in this case the energy will be produced only by the reactor coolant pumps (RCP) and not by reactor power. The energy created by the RCPs can be dissipated through the two remaining ungagged steam safety valves. Therefore, the proposed amendment request does not involve a Significant Hazards Consideration as it does not involve a significant increase in the probability or consequences of an accident previously evaluated. Additionally, it does not introduce the possibility of a previously unanalyzed accident or involve a significant reduction in the margin of safety.