

December 5, 1995

2CAN129504

U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Schedule for Generic Letter 90-06 Resolution

Gentlemen:

Generic Letter (GL) 90-06, "Resolution of Generic Issue 70, 'Power-Operated Relief Valve and Block Valve Reliability,' and Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for Light Water Reactors,' was issued on June 25, 1990 (OCNA069027). Attachment B-1 to Enclosure B of the generic letter proposed modified technical specifications on Combustion Engineering plants for low-temperature overpressure protection (LTOP) in Modes 4, 5 and 6.

Entergy Operations, at Arkansas Nuclear One (ANO), submitted our response to GL 90-06 for Unit 2, on December 21, 1990 (2CAN129013). In our response, we proposed to submit Technical Specifications to address the power-operated relief valves (PORVs) and LTOP modified Standard Technical Specifications. However, it was noted that the ANO-2 design does not utilize PORVs for LTOP and that the proposed ANO-2 Technical Specifications could only utilize the modified Standard Technical Specifications as guidance.

On April 3, 1991 (2CAN049104), Entergy Operations informed the Staff that the LTOP evaluation would utilize the Combustion Engineering Owners Group (CEOG) methodology contained in CEN-381-P, "Low Temperature Overpressurization Transient Pressure-Temperature Limit for Determination of Low Temperature Overpressure Protection Setpoints," dated December 1988, and CEN-381-P, Attachment 1-P, "Low Temperature Overpressure Protection Pressure-Temperature Limit Methodology," dated August 1990. These documents were previously submitted by the CEOG for NRC review and approval.

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As noted in the April 3, 1991, letter, it was Entergy Operations' understanding that the methodology presented in the CEOG reports was in final NRC review and a Safety Evaluation Report was scheduled for issuance in the summer of 1991.

Entergy Operations proposed a new ANO-2 Technical Specification Section 3/4.4.12 for LTOP in a letter dated June 18, 1991 (2CAN069107). Additionally, the June 18, 1991, letter stated that due to a recent reanalysis of the ANO-2 pressure-temperature limits, Entergy Operations through Combustion Engineering (CE) had recalculated the ANO-2 LTOP related setpoints. These setpoints were developed using the methodologies presented in CEOG report CEN-381-P and Attachment 1-P to CEN-381-P.

In a letter dated June 14, 1995 (2CNA069501), the Staff informed Entergy Operations that the ANO-2 response to Generic Issue-94 was unacceptable because ANO-2 utilized CEOG report CEN-381-P and Attachment 1-P. It was noted that the Staff has not accepted the methodology discussed in this report. Therefore, the Staff has requested ANO-2 to resubmit a response to Generic Issue-94 using a methodology that has been accepted by the NRC.

The purpose of this letter is to identify which methodology ANO-2 is planning to use in the response and provide the NRC a schedule for the submittal.

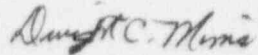
ANO-2 is planning to apply the methodology outlined in the American Society of Mechanical Engineers (ASME) Code Case N-514, "Low Temperature Overpressure Protection." To utilize this code case, an exemption from certain requirements of 10CFR50.60, "Acceptance Criteria for Fracture Prevention Measures for Light-Water Nuclear Power Reactors for Normal Operations," is required.

It is Entergy Operations' belief that the methodology presented in ASME Code Case N-514 is acceptable to the NRC. This belief is based on previous NRC approval of exemptions to use this code case and discussions with the ANO NRR Project Manager.

The schedule for the completion of the reanalysis utilizing the methodology of Code Case N-514 is the end of February 1996. This schedule is based on the premise that the current Pressure / Temperature limits listed in ANO-2 Technical Specification 3/4.4.9 will not require revision. The revised LTOP technical specification change request will be submitted to the NRC by April 15, 1996. The exemption request discussed above will be submitted in conjunction with the revised technical specification change request. This schedule has been discussed with the ANO NRR Project Manager.

Should you have any questions or comments, please contact me.

Very truly yours,



Dwight C. Mims
Director, Nuclear Safety

DCM/dwb

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