



ARKANSAS POWER & LIGHT COMPANY
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August 15, 1984

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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

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
 Results of Reanalysis Against NRC
 Clarification/Interpretation
 of Appendix R to 10CFR50

Gentlemen:

Please refer to our letters (ØCANØ38322, ØCANØ783Ø5), dated March 28, 1983, and July 12, 1983, which addressed our request for an exemption to the schedule of 10CFR50.48(c) for all barriers and all penetrations thereof and all suppression/detection systems, for approximately one year. That exemption was requested in order to allow AP&L to re-evaluate the compliance of Arkansas Nuclear One - Units 1 and 2, with Appendix R to 10CFR50, as clarified by the NRC at its March 1, 1983, meeting with the Nuclear Utility Fire Protection Group (NUFPG).

On March 2, 1983, AP&L began its re-evaluation against the March 1 clarification. However, between March and September 1983, in association with the NUFPG, AP&L participated in the review of several preliminary written versions of the March 1 guidance, which we understood was to be transmitted to all licensees in the form of a Generic Letter. As the

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preliminary versions of that guidance were inconsistent with verbal information previously provided to AP&L, the uncertainty generated dictated the discontinuation of our analytical efforts until formal written guidance had been received and the uncertainties removed.

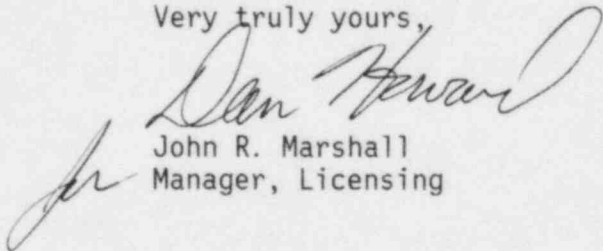
On September 14, 1983, AP&L received formal NRC guidance (OCNA098308), concerning the NRC's interpretation of Appendix R to 10CFR50. Subsequent to AP&L's receiving that guidance, Generic Letter No. 83-33, which contained the same information as your September 14 letter to AP&L, was provided to all licensees. AP&L, after receipt of that formal regulatory clarification, re-initiated its evaluation of Arkansas Nuclear One against that clarification. Additional guidance concerning Appendix R was received from the NRC in IE Information Notice No. 84-09 (OCNA028418). That information was incorporated into our reassessment as appropriate.

On April 26, 1984, AP&L attended the NRC Region IV Appendix R workshop in Arlington, Texas. At that meeting, we received further NRC guidance concerning Appendix R, and management positions concerning the need for exemption requests to certain requirements of that regulation. On April 27, 1984, AP&L met with NRC staff in Bethesda, Maryland, to discuss the results of its reassessment of ANO in accordance with previous NRC guidance, and provided its Project Managers with draft copies of that reassessment. Subsequent to that meeting, we revised our reassessment to incorporate comments made by the NRC staff.

This document updates and supercedes (the analysis portion) of our July, 1982, Appendix R submittal by incorporation of NRC guidance (provided in Generic Letter 83-33, IE Information Notice 89-09, and the management positions from the April 26, 1984, Region IV Workshop) into our methodology. It is provided in response to your June 17, 1983, (OCNA068312) letter.

We request you review and approve our methodology and the included exemption requests. Upon that approval, this document can be considered as superceding our March 28, 1983, (OCAN038322) letter.

Very truly yours,



John R. Marshall
Manager, Licensing

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