



ARKANSAS POWER & LIGHT COMPANY

FIRST COMMERCIAL BUILDING/P.O. BOX 551/LITTLE ROCK, ARKANSAS 72203/(501) 371-7901

January 28, 1985

T. GENE CAMPBELL  
Vice President  
Nuclear Operations

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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 - Unit 2  
Docket No. 50-368  
License No. NPF-6  
Proposed Technical Specifications  
for the Sodium Hydroxide Addition  
System

Gentlemen:

Attached is a proposed change to Technical Specification 4.6.2.2.e. The purpose of this change is to clarify the intent of this specification. Specification 4.6.2.2.e is contained in the Technical Specifications to ensure an adequate flow path from the discharge of the sodium hydroxide additive pump to the containment spray pump discharge. As it is currently written the specification could be misinterpreted to require testing of the sodium hydroxide additive pumps as part of this surveillance. A pump test during this surveillance is unnecessary, since these pumps are verified operable monthly per ASME Section XI requirements. Therefore, AP&L proposes to revise this specification to more clearly state the requirement.

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.

The circumstances of this amendment are not exigent or emergency. However, we do request your prompt review as this test is required during our upcoming refueling outage which is scheduled to begin in March.

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PDR ADOCK 05000368  
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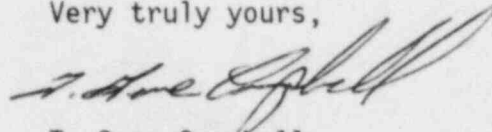
Mr. James R. Miller

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January 28, 1985

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

Very truly yours,



T. Gene Campbell

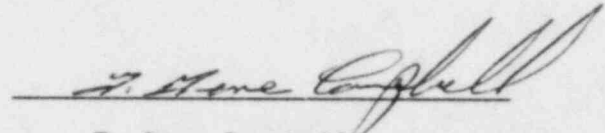
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Attachment

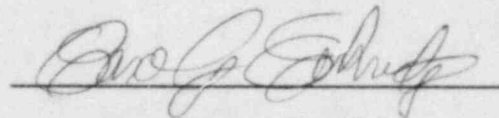
cc: Mr. E. Frank Wilson, Director  
Division of Environmental Health Protection  
State Department of Health  
4815 West Markham Street  
Little Rock, AR 72201

STATE OF ARKANSAS    )  
                              )  
COUNTY OF PULASKI    )            SS

I, T. Gene Campbell, being duly sworn, subscribe to and say that I am Vice President, Nuclear Operations, for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 2CAN018502 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

  
\_\_\_\_\_  
T. Gene Campbell

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 16<sup>th</sup> day of January, 1985.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:  
4-1-85



## DESCRIPTION OF AMENDMENT REQUEST

The current Technical specification, 4.6.2.2.d, requires that every five years the flow rate through the sodium hydroxide additive path be verified to be at least 14 gpm. The purpose of this specification is to ensure adequate piping capacity to deliver the required NaOH to the containment spray line. The sodium hydroxide additive pumps flows and their suction piping flows are verified once per month per ASME Section XI requirements. The sodium hydroxide additive pumps are rated to provide 13 gpm  $\pm$  7 percent. This flow rate is discussed in section 6.2.2.2.1.B.2 and 6.2.3.3.1.3 of the ANO-2 Safety Analysis Report. As it is currently written Technical Specification 4.6.2.2.e could be misinterpreted to require these pumps to be tested as part of the 5 year surveillance test, thus requiring them to provide a flow rate of 14 gpm which is beyond their capability. Therefore, AP&L is proposing to revise this specification to clarify its intent.

### BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The proposed amendment 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.

The Commission has provided guidance concerning the application of these standards by providing certain examples (48FR14870). The proposed amendment matches example (i) "A purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature." as it clarifies the intent of the Technical Specifications.