

ARKANSAS POWER & LIGHT COMPANY

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January 31, 1985

1CANØ185Ø7

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

ANO-1 Inservice Inspection Program Response

to Request for Additional Information

Gentlemen:

Your letter dated November 20, 1984, (1CNAll84Ø7) requested additional information on the ANO-1 Inservice Inspection (ISI) Program which was submitted by our letter dated August 27, 1984 (1CANØ8841Ø). Our letter dated December 31, 1984, (1CAN12841Ø) indicated that we would respond to your request by January 31, 1985. Our initial response is enclosed.

We are currently updating our second 10-year program to meet the requirements of the 1980 ASME Section XI Code with addenda through Winter 1981. We anticipate making our revised submittal (except for IWE Section) to NRC by February 28, 1985. The IWE Section, along with any needed IWE Section relief requests, will be submitted by June 15, 1985. The requests for ISI relief for the second 10-year program is being forwarded under separate cover dated February 4, 1985 (1CANØ285Ø1).

Very truly yours,

J. Ted Enos

Manager, Licensing

JTE: DET: ds

Attachment

8502120211 850131 PDR ADOCK 05000313 PDR A047

AT CHMENT TO 1CANØ18507

"Questions on First 10-Year Interval

By letter dated November 12, 1982. (1) responding to a request for 1. additional information dated March 2, 1982. (2) you submitted a number of additional relief requests for the first interval ISI program of ANO-1 which ends on December 19, 1984. These requests were submitted after SAI issued its technical evaluation report (3), which was attached to NRC's SER⁽⁴⁾ and evaluated the relief requests originally submitted for the first interval program (5-8). We will be reviewing these added first interval requests for relief from the requirements of the applicable editions and addenda of Section XI of the ASME Boiler and Pressure Vessel Code. If there are any other documents not referenced that you believe may aid our review (including additional relief requests), please provide us with copies. If they have been previously furnished to the NRC, please document by reference. Please note that if you have encountered unexpected limitations in conducting the first interval ISI program, you must request relief after-the-fact under the terms of subparagraph 10CFR50.55a(g)(5)(iv)."

Response:

[Note - For consistency, we are using the same reference numbering scheme as your November 20, 1984 letter (1CNA1184Ø7).

Additionally, we have added a 10th and 11th reference for purposes of this response.]

References 1, 10 and 11 contain the ISI relief requests submitted to date that are applicable to the first 10-year interval and have not been formally approved to date. Specifically, these letters are:

Ref. No.	AP&L Letter No.	Date of Letter
1	1CAN1182Ø3	November 12, 1982
10	1CAN11841Ø	November 19, 1984
11	1CAN1284Ø8	December 19, 1984

"2. The second relief request on page 2 of Reference 1 concerns NDE of the reactor vessel support skirt-to-vessel weld. Figure 1 of the reference showing a section of this structure is unclear, and the labeling is not readable. Please supply a copy of this drawing that clearly shows the dimensions of interest."

Response:

This drawing has been redrawn with emphasis on the welds. A copy of the revised drawing is enclosed as requested.

"3. Two relief requests submitted in Reference 1 (Items 6 and 7, P. 4) and one other item (#3, p. 6) were crossed out by hand in ANO-1's ISI manual that was part of the latest submittal of August 27, 1984⁽⁹⁾. Because the source and authority for these changes are not revealed, the status of these items is unclear. Please describe the relevance of these items to your first interval ISI program."

Response:

As the purpose of our August 27, 1984, letter (1CANØ8841Ø) was to transmit the second 10-year interval ISI program, the three items in question were manually "crossed-out" of an informational copy of Reference 1 in an effort to indicate they were not applicable to the second 10-year program. However, all items in Reference 1 remain applicable to the first interval ISI Program.

"Questions on Second Interval Program

4. AP&L's letter of August 27, 1984, ⁽⁹⁾ submitted the second interval ISI program for ANO-1. The letter stated that the relief requests submitted for the first interval program would "simply 'carry over'" to the second interval program. The differences between the 1974 Edition of the Code (with addenda through Summer 1975) and the 1980 Edition (with addenda) are such that the initial relief requests are not applicable to the new program. Hence, any relief needed during the second interval should be requested based on, and referencing specific sections of, the applicable code."

Response:

AP&L is presently finalizing the needed relief requests known to date for the ANO-1 Second 10-year ISI interval and based on the 1980 ASME Code with Addenda through Winter 1981. These requests will be sent to NRC under separate cover dated February 4, 1985 (1CANØ285Ø1).

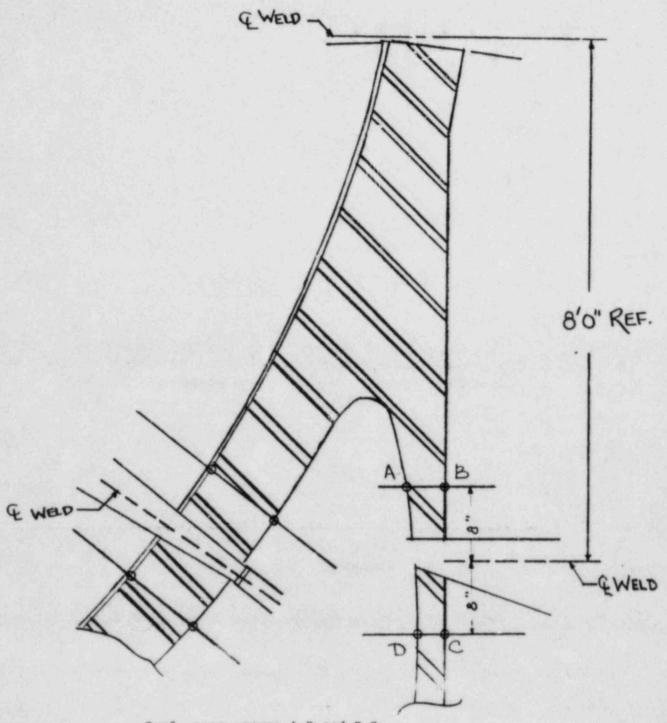
"5. Reference 9 also states that the Code edition applicable to the second interval is the 1980 Edition with addenda through Winter 1980. It is stated in 10 CFR 50.55a(g)(4)(ii) that the applicable code for each successive interval is the one in effect on the date 12 months prior to the start of that interval. The start of ANO-1's second interval is December 19, 1984. The Winter 1981 Addenda to the 1980 Edition became effective March 9, 1983 (see 48 FR 5532). Please confirm that your program will be performed in accordance with the 1980 Edition with addenda through Winter 1981 and update your submittal accordingly."

Response:

The ANO-1 Second 10-Year ISI Program will be performed in accordance with ASME Section XI, 1980 Edition through Winter 1981 Addenda. We are currently updating our program and anticipate submitting it (except the IWE Section) to NRC by February 28, 1985. We anticipate submittal of the IWE Section of our second 10-year program, along with any needed IWE Section relief requests, to NRC no later than June 15, 1985.

References

- Letter, J. R. Marshall (AP&L) to J. F. Stolz (NRC), November 12, 1982, Response to RAI on first interval ISI. (1CAN1182Ø3).
- Letter, J. F. Stolz (NRC) to W. Cavanaugh III (AP&L), March 2, 1982, Request for additional information. (1CNAØ382Ø2)
- Science Applications, Inc., <u>Arkansas Nuclear One Unit 1</u>, <u>Inservice Inspection Program Technical Evaluation Report</u>, 186-028-39, September 17, 1982. (Attachment to Reference 4 Below)
- 4. J. F. Stolz (NRC) to J. M. Griffin (AP&L), Transmittal of Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Requests for Relief from Inservice Inspection Requirements, April 18, 1983. (ICNAØ483Ø4)
- 5. Letter, W. Caranaga (AP&L) to D. K. Davis (NRC), October 19, 1977, Technical Specification changes to incorporate ISI provisions. 1CAN107707)
- Letter, D. H. Williams (AP&L) to R. W. Reid (NRC), May 19, 1978, Additional relief requested. (1CANØ57813)
- Letter, D. H. Williams (AP&L) to R. W. Reid (NRC), December 15, 1978, Response to RAI. (1CAN1278Ø3)
- Letter, D. H. Williams (AP&L) to R. W. Reid (NRC), January 10, 1979, Additional relief requested. (1CANØ179Ø2)
- Letter, J. R. Marsha'l (AP&L) to J. F. Stolz (NRC), August 27, 1984, Issued Second Interval Program. (1CANØ8841Ø)
- Letter, J. T. Enos (AP&L) to J. F. Stolz (NRC), November 19, 1984, Additional relief requested. (1CAN11841Ø)
- Letter, J. T. Enos (AP&L) to J. F. Stolz (NRC), December 19, 1984, Additional relief requested. (1CAN1284Ø8)



Surf. exam. areas A-D and B-C

GENERAL NOTE:

A volumetric examination of volume A-B-C-D from one side (B-C) of the circumferential weld may be performed in lieu of the surface examinations.