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September 28, 1992

OCAN099208

U. S. Nuclear Regulatory Commission
Document Control Desk
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Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 & 50-368
License Nos. DPR-51 & NPF-6
Operational and Surveillance Requirements for
Main Steam Line Radiation Monitors

Gentlemen:

Attached for your review and approval are proposed changes to the Arkansas Nuclear One Units 1 and 2 Technical Specifications (TS) to add limiting conditions for operation and surveillance requirements for main steam line radiation monitors in accordance with Generic Letter 83-37.

The proposed changes have been evaluated in accordance with 10CFR50.91(a)(1) using criteria in 10CFR50.92(c) and it has been determined that the changes involve no significant hazards considerations. The bases for these determinations are included in the attached submittal.

Entergy Operations requests that the effective date for these changes be 30 days after NRC issuance of the amendment to allow for distribution and procedural revisions necessary to implement these changes.

Very truly yours,

JWY/GRA/jt

Attachments

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PDR ADOCK 05000313
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AC03-1

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Aff. vit

I, J. W. Yelverton, being duly sworn, subscribe to and say that I am Vice President, Operations ANO for Entergy Operations, that I have full authority to execute this affidavit; that I have read the document numbered 0CAN099208 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

J. W. Yelverton
J. W. Yelverton

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 23rd day of September, 1992.

Sandy Schenmorgen
Notary Public

My Commission Expires:

May 11, 2000

ATTACHMENT

PROPOSED TECHNICAL SPECIFICATION CHANGES

IN THE MATTER OF AMENDING

LICENSE NO. DPR-51

LICENSE NO. NPF-6

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNITS 1 AND 2

DOCKET NO. 50-313

DOCKET NO. 50-368

DESCRIPTION OF PROPOSED CHANGES

The proposed changes add limiting conditions for operation and surveillance requirements for the main steam line radiation monitors in the Arkansas Nuclear One Unit 1 (ANO-1) and Unit 2 (ANO-2) Technical Specifications (TS).

For the ANO-1 TS:

- a. Add a new Specification 3.5.1.14 (page 42b) to specify that the main steam line radiation monitors (MSLRMs) shall be operable;
- b. Revise Table 3.5.1-1 (pages 45d2 and 45h) to include limiting conditions for operation and an action statement in the MSLRMs;
- c. Add item 28c in Table 4.1-1 to provide surveillance requirements for the MSLRMs; and
- d. Add a new specification 6.12.5.m (page 146b) to denote that a Special Report is required for inoperable MSLRMs.

For the ANO-2 TS:

- a. Revise Table 3.3-6 (pages 3/4 3-25 and 3/4 3-26) to include limiting conditions for operation and an action statement for the MSLRMs;
- b. Revise Table 4.3-3 (page 3/4 3-27) to include surveillance requirements for the MSLRMs; and
- c. Add a new specification 6.9.2.o (page 6-19a) to denote that a Special Report is required for inoperable MSLRMs.

BACKGROUND

NUREG-0737, item II.F.1 Attachment 1, required that noble gas effluent monitors with an extended range be installed to function during accident conditions as well as during normal operating conditions. NUREG-0737 specifically listed Pressurized Water Reactor (PWR) steam safety valve discharge / atmospheric steam dump valve discharge as an effluent pathway which should be monitored. In response to this requirement, Main Steam Line Radiation Monitors (MSLRM) were installed on AEO-1 and 2.

The MSLRM system is an Zberline Model RMS II monitoring system. The detectors are remote detector assemblies attached between the containment penetration and the safety relief valves and provide a signal back to an indicator for each detector in the control room and to the Safety Parameter Display System (SPDS). The signal from each indicator is also supplied to a dual pen recorder in the control room. For ANO-1, monitor RE-2681 is strapped to the steam generator (SG) E-24B main steam line and monitor RE-2682 is strapped to the SG E-24A main steam line. For ANO-2, monitor 2RE-1007 is strapped to SG 2E-24A main steam line and monitor 2RE-1057 is strapped to SG 2E-24B main steam line.

NUREG-0737 also required that TS changes be made to incorporate the noble gas effluent monitors required by item II.F.1 Attachment 1. Generic Letter 83-37 was issued November 1, 1983 to specify the TS changes that the NRC would find acceptable for implementing the requirements of NUREG-0737. Generic Letter 83-37 included TS changes for the noble gas effluent monitors. By letter dated March 16, 1984 (OCAN038401) ANO responded to Generic Letter 83-37. The response to Generic Letter 83-37 referred to the submittal dated September 30, 1983 (OCAN098310) which proposed the radiological effluent TS (RETS) as satisfying the requirement to submit the necessary TS changes for the noble gas effluent monitors. The RETS change included the noble gas effluent pathways described in NUREG-0737 item II.F.1 Attachment 1 except the PWR steam safety valve discharge / atmospheric steam dump valve discharge. The MSLRMs which monitor this pathway were inadvertently omitted from the RETS submittal.

DISCUSSION

Generic Letter 83-37 provided sample TS pages for incorporating Limiting Conditions for Operation and Surveillance Requirements for the noble gas effluent monitors. The proposed TS changes are consistent with the generic letter except for the specification of a setpoint for the MSLRMs and the measurement range has been converted to mR/hr to be consistent with the indication scale. No setpoint is specified for the ANO-1 TS and "not applicable" is specified for the ANO-2 TS based on the following considerations:

- 1) No regulatory requirement could be found that requires a setpoint be specified in the TS for these monitors.
- 2) The latest draft of the Revised Standard TS does not include the radiation monitor table. Instead, these monitors would be included in the post accident monitor table which does not include a column for setpoints.
- 3) The Waterford 3 TS have the main steam line radiation monitors in the radiation monitoring table with "not applicable" specified for the setpoint.
- 4) The ANO-2 radiation monitoring table specifies "not applicable" for the Containment High Range Area Radiation Monitors which were added to the radiation monitor table as a result of Generic Letter 83-37 and was approved by the NRC in Amendment 63 to the ANO-2 TS. The Containment High Range Area and the Main Steam Line Radiation Monitors are both post accident type monitors which the operators can use for information to make post accident decisions. Instruments which perform only a post accident monitoring function have typically not had alarm/trip setpoints specified in the TS.

Consistent with Generic Letter 83-37, the proposed changes require the MSLRMs to be operable whenever the reactor is above the cold shutdown condition. In case of failure of the MSLRMs an alternate preplanned method of monitoring this effluent pathway is required to be established within 72 hours. The alternate method could, for example, involve obtaining a sample of main steam line condensate and analyzing the sample by gamma spectroscopy, relying on the

installed N-16 monitors, or temporarily positioning a local radiation survey instrument on the main steam line. The inoperable monitor must be restored to operable status within 7 days or a special report must be submitted within 14 days describing the inoperable condition, the actions taken to correct the condition, and the plans and schedule for restoring the system to an operable status.

DETERMINATION OF SIGNIFICANT HAZARDS

An evaluation of the proposed change has been performed in accordance with 10CFR50.91(a)(1) regarding no significant hazards considerations using the standards in 10CFR50.92(c). A discussion of these standards as they relate to this amendment request follows:

Criterion 1 - Does Not Involve a Significant Increase in the Probability or consequences of an Accident Previously Evaluated.

The Main Steam Line Radiation Monitors (MSLRM) do not provide information that is required to safely shutdown the plant. The monitors provide release information for evaluating offsite emergency action when venting through the steam safety and atmospheric dump valve paths. Also, with this change there are no modifications to the configuration or the operation of the plant. This change only adds operability and surveillance requirements for these monitors. Therefore, this change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

Criterion 2 - Does Not Create the Possibility of a New or Different Kind of Accident from any Previously Evaluated.

The MSLRMs are used to provide passive monitoring of radiation levels during and following an accident in which a primary to secondary system leak has occurred. The accident conditions for which the monitors would provide useful information have previously been analyzed. Therefore, this change does not create the possibility of a new or different kind of accident from any previously evaluated.

Criterion 3 - Does Not Involve a Significant Reduction in the Margin of Safety

The MSLRMs are not required to safely shutdown the plant. The proposed change imposes additional limitations, restrictions, or controls not presently in the TS. Therefore, this change does not involve a significant reduction in the margin of safety.

The Commission has provided guidance, in 51FR7750 (3/6/86), concerning the application of these 10CFR50.92 standards by providing examples of amendments which are likely to involve no significant hazards considerations. The proposed amendment most closely matches example B(ii) "A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, e.g., a more stringent surveillance requirement."

Therefore, based on the above and the previous discussion of the amendment request, Entergy Operations has determined that the requested change does not involve a significant hazards consideration.