

ARKANSAS POWER & LIGHT COMPANY

FIRST COMMERCIAL BUILDING/P.D. BOX 551/LITTLE ROCK, ARKANSAS 72203/(501) 371-7901 February 8, 1985

T. GENE CAMPBELL Vice President Nuclear Operations

2CANØ285Ø5

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 Spent Fuel Handling Air Ventilation Technical Specification Change Request

Gentlemen:

Attached is a Technical Specification change which reduces the required flow rate of the spent fuel handling area ventilation system from 39,700 cfm \pm 10% to 30,000 cfm \pm 10%.

Technical Specification 4.9.11.2 requires the spent fuel handling area ventilation system flow rate to be 39,700 cfm \pm 10% during surveillance testing. The capability of the spent fuel ventilation system exhaust fans to provide this flow rate is marginal. Based upon a review of the design requirements for this system it was concluded that the current flow requirement of 39,700 cfm \pm 10% is overly conservative and therefore can be reduced.

Bechtel provided the criteria used in determining the design flow rate for this system. The design flow rate of the spent fuel handling area ventilation system is based on equipment heat gain and lighting loads and is designed to provide a minimum of 15 air changes per hour for a room volume up to 15 feet above floor level. This is conservative since the equipment and lighting loads in this area only require 13 changes per hour to provide adequate ventilation. Calculations based on 15 changes per hour establish the minimum required system flow rate of 21,085 cfm. This flow rate is also sufficient to maintain a negative pressure in the spent fuel area. The existing technical specification required flow rate is overly conservative in that it is based on fan capacity and not design flow for the area.

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Reald whethere \$150.00

MEMBER MIDDLE SOUTH UTILITIES SYSTEM

The value of 30,000 cfm \pm 10% has been chosen to produce a system flow rate which is well above the minimum required but will not be at the upper limit of fan capacity. This will allow a more acceptable availability range for fan adjustments.

In accordance with 10CFR50.90, we have determined the proposed Technical Specification amendment reque t as having no Significant Hazards Consideration (SHC) and are including the basis of our SHC determination as part of this amend ent package. Additionally, a copy of this amendment package has been sent to Mr. E. Frank Wilson, Director, Division of Environmental Health Protection, State Department of Health.

Also, pursuant to 10CFR170.12(c) we are including a check in the amount of \$150 as application fee. The circumstances of this proposed amendment are not exigent or emergency.

Very truly yours. 7. Have laplel T. Gene Campbel

TGC/SAB/ac

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)

I, T. Gene Campbell, being duly sworn, subscribe to and say that I am Vice President of Nuclear Operations for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 2CANØ285Ø5 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

SS

T. GENE CAMPBELL

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this grid day of <u>Julyury</u>, 1985.

Notary Public

Ny Commission Expires: 4-1-85

DESCRIPTION OF AMENDMENT REQUEST

This prop 3d change would reduce the required fuel handling area ventilation system flow rate from 39,700 cfm $\pm 10\%$ to 30,000 cfm $\pm 10\%$. The value of 39,700 cfm $\pm 10\%$ stated in Technica' Specification 4.9.11.2 was incorrectly based on fan capacity, and not design flow requirements for the area. This change will reduce the required flow rate for the spent fuel handling area ventilation system to a value which is more compatible with the exhaust fans design capacities while still meeting the ventilation system's design requirement.

BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Although this amendment does not exactly match any of the examples provided by the Commission (ref: DLOF 228, Federal Register, Vol. 48, p. 14870) it does not involve a Significant Hazards Consideration. This amendment reduces a Technical Specification value from an overly conservative value based upon fan capacity to a value based upon a more reasonable yet conservative flow rate for the spent fuel handling area ventilation system. Therefore, the proposed amendment request 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.