



ARKANSAS POWER & LIGHT COMPANY

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

January 17, 1986

T. GENE CAMPBELL  
Vice President  
Nuclear Operations

ICANØ186Ø2

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  
Proposed Technical Specification For ESAS  
Low RCS Pressure Setpoint

Gentlemen:

In conjunction with our response to NUREG 0737 Item II.K.3.30, a modified version of the CRAFT thermal hydraulic analysis code (CRAFT 2) was submitted for NRC review and approval. In support of the new code, analyses of small break LOCA's were presented. The results demonstrated the superiority of the revised code in most aspects; however, in one case it demonstrated the need for a possible change in the setpoint for high pressure injection (HPI) initiation upon low RCS pressure. Because the revised code was unapproved, no change in technical specification setpoint was warranted.

Upon NRC approval of the CRAFT 2 code however, AP&L initiated actions to observe the new setpoints. Since the actual in-plant setpoint was already conservative with respect to the newly required value, no hardware changes or modifications were required; however, AP&L initiated actions to administratively observe the new technical specification setpoint as required by the new CRAFT 2 analysis. Consequently, AP&L is submitting the attached technical specification change for your approval at this time.

In accordance with 10CFR50.92(c), we have determined the proposed amendment to involve 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.

AD - D. CRITCHFIELD (ltr only)  
ER (W. JOHNSTON)  
RSB (THOMAS)  
EICSB (PARR)  
FDB (W. HEGAN)

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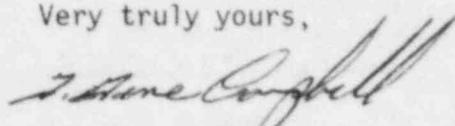
Mr. J. F. Stolz

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January 17, 1986

Pursuant to 10CFR170.12(c), we are including payment in the amount of \$150.00 as the application fee for the processing of this amendment.

Very truly yours,

A handwritten signature in cursive script, appearing to read "T. Gene Campbell".

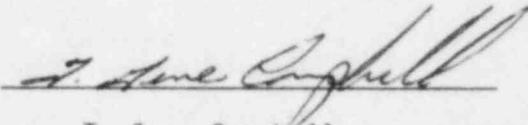
T. Gene Campbell

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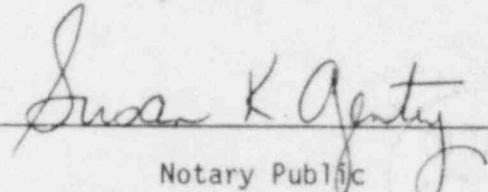
Attachment

STATE OF ARKANSAS )  
 ) SS  
COUNTY OF PULASKI )

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 ICANØ186Ø2 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 21 day of January, 1987<sup>162kg</sup>

  
Notary Public

My Commission Expires:

May 7, 1993

## DESCRIPTION OF AMENDMENT REQUEST

The current technical specification low RCS pressure setpoint of 1500 psig for ESAS High Pressure Injection initiation is based on a safety analysis assumption of 1365 psig. This provided adequate margin (150 psig) for loop error/accuracy considerations. The value provided was high enough to provide protection for the entire spectrum of break sizes yet far enough below normal operating pressures to prevent spurious initiation.

As a result of the recent re-analyses of certain small breaks, the previous safety analysis value was demonstrated to be inadequate; therefore, a higher value was provided by B&W. Following detailed loop error/analysis calculations by B&W, a new value of 1526 psig was established. AP&L's existing plant setpoint for this variable is greater than 1530 psig; however, a formal technical specification change is required to reflect the new minimum acceptable value of 1526 psig.

## BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The technical specification change requested involves only a change in the setpoint as reflected by computer simulations of various design basis accidents. The computer analysis supports establishment of a different setpoint than that previously required by earlier analysis; however, the new setpoint is still within currently established plant setpoints; therefore, the change in the technical specification setpoint does not increase the probability or consequences of an accident previously evaluated. In either case, the safety system actuation would have occurred at the same point.

The change merely affects the value at which the safety system is required to actuate in response to postulated accidents; therefore, it in no way creates the possibility of new or different kind of accidents from any previously evaluated.

The previous setpoint was established by adding the estimated accident error allowances to the specific safety analysis assumed value. Since this is the same method utilized in calculating the proposed setpoint, the margin of safety has not been reduced.

Based upon the above, it can be seen that the proposed amendment request does not involve a Significant Hazards Consideration.

The Commission has provided guidance concerning the application of the Significance Hazards Consideration Determination by providing certain examples (40 CFR 14870). Since the computer re-analyses which resulted in the need for the proposed change was a result of changes in regulations (NUREG 0737 item II.K.3.30), this proposed amendment matches item (vii):

- (vii) "A change to make a licensee conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations."