



## ARKANSAS POWER & LIGHT COMPANY

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February 21, 1986

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Mr. Robert D. Martin Regional Administrator U. S. Nuclear Regulatory Commission Region IV 611 Pyan Plaza Drive, Suite 1000 Arlington, TX 76011

Det no 50-313 + 50-368 Lec. no DPR-51 + NPF-6

SUBJECT: Arkansas Nuclear One - Units 1 & 2 Docket Nos. 50-313 and 50-368 License Nos. DPR-51 and NPF-6 EAL Classification Criteria

Dear Mr. Martin:

Arkansas Power and Light Company is in receipt of your correspondence of January 16, 1986 (@CNAØ1861@). We have reviewed the deficiencies noted in the aforementioned letter and provide the attached response.

Should you have questions regarding this information, please contact my office.

Very truly yours,

J. Ted Enos, Manager

Nuclear Engineering & Licensing

JTE/MWT/sa

Attachment

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## NRC Findings

The ANO EALs listed in the E/P and EPIP (event oriented) were compared to the NUREG-0654, "Example Initiating Conditions," of Appendix 1, and it was noted that numerous EALs of NUREG-0654 were not addressed.

Table D-2 of the Emergency Plan lists the correlation of Design Basis Accidents of the FSAR to various emergency classes. However, no scheme of classification is provided in the EPIPs that assures all FSAR accidents have applicable EALs listed.

The EAL (classification criteria) for SAE (paragraph 8.1.1, EPIP 1903.10) dealing with offsite dose rates, addresses only "Projected summed offsite dose rates..." rather than in-situ results of monitoring (also) as is required by 10CFR50, Appendix E, paragraph B and NUREG-0654.

## AP&L Response

Following NRC inspection 50-313/368-84-23 conducted July 9-13, 1984, AP&L evaluated the emergency action levels presently contained in the Emergency Plan and compared them to the FSAR postulated accidents and to the example initiating conditions of Appendix 1 to NUREG-0654. The results of that analysis indicate that the existing emergency action level classification criteria adequately respond to the pre-defined FSAR scenarios and address the NUREG-0654, Appendix 1 initiating conditions. During the next emergency planning inspection, AP&L would like to review and discuss our analysis with the inspector. Some format changes to our present EAL system are being evaluated; however, we believe that most of the concerns expressed during the exit meeting following the October 30-November 1, 1985 inspection have been addressed by our analysis.

The results of offsite monitoring are utilized in the decision-making process for classification when such data is available. The EAL at site area emergency relating to "Projected summed offsite dose rates..." has been revised in the Emergency Plan to state "Projected or measured summed offsite dose rates...". A corresponding change to the Implementing Procedures is in progress.