

# ARKANSAS POWER & LIGHT COMPANY CAPITOL TOWER BUILDING/P. O. BOX 551/LITTLE ROCK, ARKANSAS 72203/(501) 377-3525

June 30, 1988

T. GENE CAMPBELL Vice President - Nuclear

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1CANØ688Ø9

U. S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

Attn: Mr. Jose A. Calvo, Director Project Directorate IV Division of Reactor Projects III, IV, V and Special Projects

> SUBJECT: Arkansas Nuclear One - Unit 1 Docket No. 50-313 License No. DPR-51 Technical Specification Change Request -Control Rod Drive Trip Breaker

Dear Mr. Calvo:

The Arkansas Power and Light Company hereby requests an amendment to its Operating License DPR-51 for Arkansas Nuclear One - Unit 1 with the enclosed submittal of proposed changes to the Technical Specifications.

The proposed changes are made at the request of the U.S. Nuclear Regulatory Commission related to the reactor trip breaker design modifications (Generic Letters 83-28 and 85-10). The additional guidance contained in the request for additional information (RAI) from Mr. John F. Stolz (NRC) to Mr. T. Gene Campbell (AP&L), dated August 25, 1986 (1CNA088604), has been utilized in preparing this submittal.

In accordance with 10CFR50.91(a)(1), AP&L has evaluated the proposed changes using the criteria in 10CFR50.92(c) and has determined that said changes involve no significant hazards considerations. The bases for this determination are attached. Also, in accordance with 10CFR50.91(b)(1) a copy of this amendment request with attachments has been sent to Ms. Greta Dicus, Director, Division of Radiation Control and Emergency Management, Arkansas Department of Health.

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Mr. Jose A. Calvo

A check in the amount of \$150 is included herewith as an application fee in accordance with 10CFR170.12(c).

Very truly yours,

T. A. ine Campbell

T. Gene Campbell

TGC:1g

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Attachments

cc: Ms. Greta Dicus, Director Division of Radiation Control and Emergency Management Arkansas Department of Health 4815 West Markham Street Little Rock, AR 72205 STATE OF ARKANSAS COUNTY OF PULASKI

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I, T. Gene Campbell, being duly sworn, subscribe to and say that I am Vice President, Nuclear for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered 1CANØ688Ø9 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

1. Ane Comphill

T. Gene Campbell

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 30th day of June 1988.

Shiley Hunter Notary Public

My Commission Expires:

3-1-91

# PROPOSED TECHNICAL SPECIFICATION CHANGE IN THE MATTER OF AMENDING LICENSE NUMBER DPR-51 ARKANSAS POWER AND LIGHT COMPANY ARKANSAS NUCLEAR ONE - UNIT 1 DOCKET NUMBER 50-313

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### PROPOSED CHANGE

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- A. Table 3.5.1-1 (Page 44a) is revised to add Functional Unit 13 (Electronic (SCR) Trip relay). Note 22 (Page 45g) is also added to apply if one or more of the Electronic (SCR) Trip relays in a channel is inoperable.
- B. Table 3.5.1-1 (Page 44a) is revised to add Functional Unit 14 (Control Rod Drive Trip Breakers). Notes 23 and 24 (Page 45g) are added to apply if one of the channels is inoperable or if only one of the diverse trip features (undervoltage or shunt trip attachment) of the control rod drive trip breaker is inoperable, respectively.
- C. Table 4.1-1 (Page 69) is revised to modify the "Remarks" column for the monthly surveillance test. This change requires that the test independently verify the operability of the undervoltage and shunt trip attachments.
- D. Table 4.1-1 (Page 72d) is revised to add Channel Description 61 (Electronic (SCR) Trip relay) and require monthly channel functional testing.

## DISCUSSION

Item 4.3 of Generic Letter 83-23, "Required Actions based on Generic Implications of Salem ATWS Events," established the requirement for the automatic actuation of the shunt trip attachment for B&W plants. Item 4.4 of Generic Letter 83-23 specified that the appropriate surveillance and test requirements of the Technical Specifications be revised to include testing of the silicon controlled rectifiers (SCR) used to interrupt power to control rods.

The NRC issued a Safety Evaluation Report finding the design acceptable for the ANO-1 automatic actuation of the reactor trip breakers (RTB) shunt trip attachments, in correspondence from Mr. John F. Stolz (NRC) to Mr. John M. Griffin (AP&L), dated January 24, 1984 (1CNAØ184Ø2). Arkansas Power and Light implemented the shunt trip modifications associated with the reactor trip breaker (DCP83-1044A) during the ANO-1 mid-cycle outage in March 1984. The shunt trip is operable from an automatic reactor protection signal and tested on a monthly basis (1CANØ584Ø5).

The NRC issued a Safety Evaluation Report (1CNA108605) finding the improvements in the ANO-1 maintenance and test procedures relevant to the SCRs acceptable as a result of AP&L's response to Item 4.4 of Generic Letter 83-23. Testing of the SCR circuit networks has been conducted on a monthly basis using the safety-related Reactor Protection System (RPS) Monthly thannel Test procedures. By expanding the scope of this safety-related testing, the procedures were revised to also include degating of the SCRs. The electronic trip feature in the SCR circuit network is the method by which SCRs are degated. In respon to Generic Letter 85-10, AP&L proposes Technical Specification chains the unit include the electronic trip channels associated with the circuits in the maintenance and test requirements section of the ANO-1 leconical Specifications and the Instrumentation Limiting Conditions for Operation (1CO). Generic Letter 85-10 found that proposed Technical Specifications should be submitted tr reflect appropriate LCO and surveillance requirements consisting f independent testing of the shunt and undervoltage trip attachments, as a result of the B&W generic design modifications. In response to Generic Letter 85-10, the BWOG in correspondence (1CAN1Ø8507) from Mr. J. Ted Enos, Chairman (BWOG/ATWS) to Mr. Hugh L. Thompson, Jr. (NRC) dated October 9, 1985, requested a substitute LCO action statement for the Oconee class design. In reply, the NRC provided an acceptable, revised action statement in correspondence from Mr. Frank Miraglia (NRC) to Mr. J. Ted Enos (BWOG/ATWS), dated December 6, 1985. As a result of these pending issues being resolved, AP&L proposes changes to the ANO-1 nonstandard Technical Specifications consistent with the request for additional information (RAI) from Mr. John F. Stolz (NRC) to Mr. T. Gene Campbell (AP&L) dated August 25, 1986 (1CNAØ886Ø4).

## DETERMINATION OF SIGNIFICANT HAZARDS

Arkansas Power and Light Company has performed an analysis of the proposed change in accordance with 10CFR90.91(a)(1) regarding no significant hazards consideration, using the standards in 10CFR90.92(c).

A discussion of those standards as they relate to this amendment request follows:

<u>Criterion 1</u> - Does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change would not increase the probability or consequences of any accident previously evaluated since the addition of limiting conditions for operation and surveillance requirements are made to conform with the Commission's generic requirements for reducing a potential ATWS event.

<u>Criterion 2</u> - Does not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed change would not create the possibility of a new or different kind of accident from any previously analyzed since the scope of the change does not establish a potential new accident precursor.

<u>Criterion 3</u> - Does not involve a significant reduction in a margin of safety.

The proposed changes would not involve a significe c reduction in the margin of safety, rather, it constitutes additional controls and surveillance requirements not presently included in the Technical Specifications.

The Commission has provided guidance concerning the application of these standards by providing examples. The proposed amendment is most closely encompassed by Example (ii): a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications.

Therefore, based on the reasoning presented above and the previous discussion of the amendment request, AP&L has determined that the requested changes do not involve a significant hazards consideration.

PROPOSED TECHNICAL SPECIFICATION CHANGES

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