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November 24, 1998

0CAN119801

U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station OP1-17
Washington, DC 20555

Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Proposed Administrative Controls Technical Specification Changes

Gentlemen:

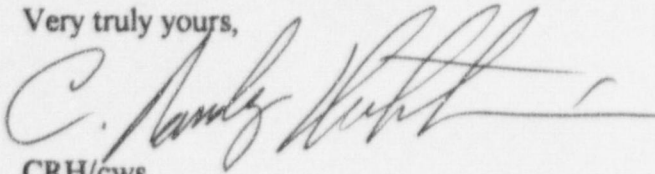
Attached for your review and approval are proposed changes to the Arkansas Nuclear One - Unit 1 (ANO-1) and Unit 2 (ANO-2) Technical Specification (TS) Administrative Controls section. The proposed changes are necessary to implement the consolidated Entergy Operations (EOI) Quality Assurance (QA) Plan Manual submitted by letter dated April 30, 1998 (CNRO-98/00013) and approved by the NRC in a Safety Evaluation dated November 6, 1998 (CNRI-98/00005). The proposed changes also clarify the responsibilities of the shift technical advisor position on shift, simplify the contents of the monthly operating report description in accordance with Generic Letter (GL) 97-02, complete the relocation of fire protection requirements from the TS to the fire protection program in accordance with GL 88-12, and replace position titles with descriptions of functional responsibility in accordance with GL 88-06.

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 these 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 this change be within 60 days of approval. Per discussions between representatives of Entergy Operations and the NRC staff, approval of the EOI QA Plan Manual is expected in November 1998. A six month implementation period has been requested for the EOI QA Plan Manual. Although this request is neither exigent nor emergency, your prompt review is requested in order to allow implementation of the consolidated EOI QA Plan Manual in April 1999.

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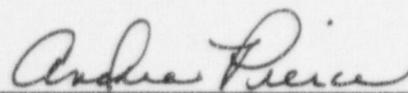
Very truly yours,



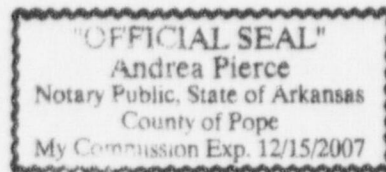
CRH/cws
Attachments

To the best of my knowledge and belief, the statements contained in this submittal are true.

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for Pope
County and the State of Arkansas, this 24th day of November, 1998.



Notary Public
My Commission Expires 12/15/2007



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ATTACHMENT

TO

OCAN119801

PROPOSED TECHNICAL SPECIFICATION

AND

RESPECTIVE SAFETY ANALYSES

IN THE MATTER OF AMENDING

LICENSE NOs. DPR-51 and NPF-6

ENERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNITS ONE & TWO

DOCKET NOs. 50-313 and 50-368

DESCRIPTION OF PROPOSED CHANGES

Arkansas Nuclear One - Unit 1 (ANO-1) Changes

1. Specification 6.1.1 has been revised to indicate that the responsibilities for the specified functions are those of the ANO-1 plant manager, not the Vice President, Operations ANO. This specification has also been revised to refer to unit operations, not facility operations.
2. Specification 6.1.2 specifying the control room command function during specific modes of operation has been added.
3. Specification 6.2.1.a has been revised to require the documentation of the unit specific titles of those personnel fulfilling the responsibilities delineated in the technical specifications in the ANO-1 Safety Analysis Report (SAR).
4. Specifications 6.2.1.b, 6.2.1.c, 6.11.2 have been revised to delete reference to specific position titles, and now refer to the appropriate functional responsibility.
5. The heading for Specification 6.2.2 has been revised from "Facility Staff" to "Unit Staff."
6. Specification 6.2.2 has been revised and now requires that the operations manager or an operations staff middle manager holds a Senior Reactor Operator (SRO) license.
7. Specification 6.3.1 has been revised by the deletion of the Shift Technical Engineer qualifications.
8. Specification 6.4 training requirements, specified by 6.4.1 and 6.4.2 have been deleted.
9. Table 6.2-1 has been revised by the deletion of the Shift Technical Engineer, and the incorporation of Additional Requirement 5, delineating the responsibilities of the individual providing advisory technical support for the unit operations shift crew.
10. Specification 6.6 reportable event actions have been deleted.
11. Specification 6.8.2 requiring review and approval of procedures and changes in intent has been deleted.
12. Specification 6.8.3 requirements for interim approval of procedure changes has been deleted.
13. Specification 6.9 requirements for record retention have been deleted.
14. Specification 6.12.2.3 description of the contents of the monthly operating report has been revised to reduce the level of detail specified.
15. Specification 6.12.5.h and 6.12.5.i special reports have been deleted.
16. Pages 119 through 125a, all stating "intentionally left blank" have been removed.

Arkansas Nuclear One - Unit 2 (ANO-2) Changes

1. Specification 6.1.1 has been revised to indicate that the responsibilities for the specified functions are those of the ANO-2 plant manager, not the Vice President, Operations ANO. This specification has also been revised to refer to unit operations, not facility operations.
2. Specification 6.1.2 specifying the control room command function during specific modes of operation has been added.
3. Specification 6.2.1.a has been revised to require the documentation of the unit specific titles of those personnel fulfilling the responsibilities delineated in the technical specifications in the ANO-1 Safety Analysis Report (SAR).
4. Specifications 6.2.1.b, 6.2.1.c, 6.13.2 have been revised to delete reference to specific position titles, and now refer to the appropriate functional responsibility.
5. The heading for Specification 6.2.2 has been revised from "Facility Staff" to "Unit Staff."
6. Specification 6.2.2.f delineating the responsibilities of the individual providing advisory technical support for the unit operations shift crew has been incorporated.
7. Specification 6.2.2.h has been revised and now requires that the operations manager or an operations staff middle manager holds a Senior Reactor Operator (SRO) license.
8. Table 6.2-1 has been revised by the deletion of the Shift Technical Engineer.
9. Specification 6.4 training requirements specified by 6.4.1 have been deleted.
10. Specification 6.6 reportable occurrence actions have been deleted.
11. Specification 6.8.2 requiring review and approval of procedures and changes in intent has been deleted.
12. Specification 6.8.3 requirements for interim approval of procedure changes has been deleted.
13. Specification 6.9.1.6 description of the contents of the monthly operating report has been revised to reduce the level of detail specified.
14. Specification 6.9.2.e and 6.9.2.f special reports have been deleted.
15. Specification 6.10 requirements for record retention have been deleted.
16. Pages 6-6 through 6-12, all stating "intentionally left blank" have been removed.

BACKGROUND

By letter dated April 30, 1998 (CNRO-98/00013), Entergy Operations, Inc. (EOI) requested NRC review and approval of a Quality Assurance Program Manual (QAPM) for use by all of EOI. This review and approval was requested in accordance with 10 CFR 50.54(a)(3). The new common QAPM was proposed to provide consistency in quality assurance program implementation within EOI and bring the EOI quality assurance program into closer alignment

generic guidance issued by the NRC for operating plants. The common QAPM was approved by the NRC in a Safety Evaluation dated November 6, 1998 (CNRI-98/00005).

In CNRO-98/00013, EOI identified changes to the ANO TSs that were needed to support the implementation of a common EOI quality assurance program. Section 6.0 of the ANO-1 and ANO-2 TSs describes the administrative controls to be implemented on each unit which include detailed descriptions of quality assurance program activities. To support the implementation of the common quality assurance program, the descriptions of quality assurance program activities must be revised. The associated proposed changes are consistent with the requirements contained in NUREG-1430 "Standard Technical Specifications - Babcock and Wilcox Plants" dated April 1995, and NUREG-1432 "Standard Technical Specifications - Combustion Engineering Plants" dated April 1995.

Additional changes related to Generic Letter 97-02 (GL 97-02) "Revised Contents of the Monthly Operating Report," Generic Letter 88-12 (GL 88-12) "Removal of Fire Protection Requirements from Technical Specifications," reduction of regulatory duplication, and replacement of position titles with functional descriptions in accordance with Generic Letter 88-06 (GL 88-06) "Removal of Organization Charts From Technical Specification Administrative Control Requirements," have also been included.

DISCUSSION OF CHANGES

Addition of Requirements

Specification 6.1.2 has been added to the ANO-1 and ANO-2 TSs. This new requirement specifies the functional position with the responsibility for the control room command function in all modes of operation. This change results in a more restrictive requirement than currently specified and is consistent with the requirements specified in NUREG-1430 and NUREG-1432.

References Changes From QA Manual to Safety Analysis Report (SAR)

ANO-1 Specification 6.2.1.a and ANO-2 Specification 6.2.1.a require the documentation of the requirements associated with lines of authority, responsibility, and communication in the Quality Assurance (QA) Manual Operations. This proposed change revises the document containing this documentation from the QA Manual Operations to the SAR. Detailed position descriptions and organization structure will be controlled in accordance with commitments to ANSI N18.7 Section 3.2. Since the ANO-1 and ANO-2 SARs are maintained under the ANO 10 CFR 50.59 process, there is adequate assurance that the requirements will be maintained.

In addition, a phrase has been added to ANO-1 Specification 6.2.1.a and ANO-2 Specification 6.2.1.a requiring that the documentation in the SAR include the unit specific titles of those personnel fulfilling the responsibilities of the positions delineated in the TS. This change is consistent with NUREG-1430 and NUREG-1432, as modified by generic change TSTF-065, Rev 1 which was approved by the NRC on December 2, 1997.

Changes to Shift Technical Advisor Requirements

The ANO-1 and ANO-2 Table 6.2-1 requirements associated with the Shift Technical Advisor (STA) and the ANO-1 Specification 6.3.1 requirements associated with the STA educational background have been deleted. ANO-1 Table 6.2-1, Additional Requirement 5, and ANO-2 Specification 6.2.2.f have been added to more clearly specify the responsibilities of the STA position. The proposed changes are consistent with the requirements currently specified in ANO-1 and ANO-2 Table 6.2-1 and represent a change in presentation rather than a change in requirements. The proposed changes result in clarification in that they do not imply that the STA and the "shift supervisor" must be different individuals. Option 1 of the Commission Policy Statement on Engineering Expertise on Shift is satisfied by assigning an individual with specified educational qualifications to each operating crew as one of the SROs (preferably the shift supervisor) required by 10 CFR 50.54(m)(2)(i) to provide the technical expertise on shift.

The proposed deletion of the ANO-1 Specification 6.3.1 STA training requirements is acceptable as these requirements are also contained in ANO-1 SAR Section 12.1.2. This deletion of detail is consistent with the NUREG-1430 and NUREG-1432 requirements for the STA position.

Monthly Operating Report (MOR) Changes

Generic Letter 97-02 (GL 97-02) "Revised Contents of the Monthly Operating Report" delineates the contents of the MOR and states that licensees will have to take whatever means are appropriate to negate any prior commitments or requirements which may include amendments to the facility operating license. The purpose of this generic letter was to inform licensees that the NRC is requesting the submittal of less information in the monthly operating report. Since the current ANO-1 MOR description requires the submittal of information no longer required by the NRC, EOI proposes to delete this additional information from the ANO-1 TS. Therefore, ANO-1 TS 6.12.2.3, Monthly Operating Report, is modified accordingly.

Relocation of Fire Protection Requirements

ANO-1 Specification 6.4.2, ANO-1 Specification 6.12.5.h, ANO-1 Specification 6.12.5.i, ANO-2 Specification 6.9.2.e, and ANO-2 Specification 6.9.2.f have been deleted from the ANO-1 and ANO-2 TS, as appropriate.

ANO-1 Specification 6.4.2, associated with the Fire Brigade training program, provides a level of detail inconsistent with the requirements contained in the ANO-2 TS and with NUREG-1430. The specific training program requirements are currently maintained in ANO-1 SAR Section 9D.7.2. Since the ANO-1 SAR is maintained under the ANO 10 CFR 50.59 process, there is adequate assurance that the requirements will be maintained.

ANO-1 Specification 6.12.5.h, ANO-1 Specification 6.12.5.i, ANO-2 Specification 6.9.2.e, and ANO-2 Specification 6.9.2.f require that a Special Report be submitted when fire detection instrumentation or fire suppression systems are inoperable for longer than allowed by the Fire Protection Program provisions which were removed from the Technical Specifications in accordance with Generic Letter 88-12 "Removal of Fire Protection Requirements From Technical Specification." This reporting is not required by NUREG-1430 and NUREG-1432, and additionally, was not required to be retained in the TS by Generic Letter 88-12. As such, the Special Reports for fire protection program degradation, e.g., inoperable equipment, will no longer be submitted. In association with this change, the ANO-1 and ANO-2 Safety Analysis Reports will also be revised to remove Special Reporting requirements from the Fire Protection Program. As indicated in Generic Letter 88-12; "In Generic Letter 86-10, licensees were reminded of their responsibilities to report deficiencies in the Fire Protection Program which meet the criteria of 10 CFR 50.72 and 10 CFR 50.73. Other conditions which represent deficiencies of this program and are not encompassed by the above reporting criteria should be evaluated by the licensees to determine appropriate corrective action." The Fire Protection Program (ANO-1 and ANO-2 SARs Section 9D) will be modified from "or prepare and submit a Special Report... outlining..." in each location where a Special Report is currently required to indicate "or document the deficiency in a condition report outlining..." As before, any deficiency which is reportable under 10 CFR 50.72 or 10 CFR 50.73, will be reported in accordance with these regulations. The relocation of fire protection requirements was previously evaluated in the Safety Evaluation for Amendments 158 and 132 (ANO-1 and ANO-2, respectively) dated March 31, 1992. This change is consistent with NUREG-1430, NUREG-1432 and Generic Letter 88-12.

Replacement of Position Titles with Functional Area Descriptions

Where possible, plant specific management position titles in the ANO-1 and ANO-2 specifications have been replaced with generic titles as provided in ANSI/ANS 3.1. Personnel who fulfill these positions are still required to meet the qualifications detailed in ANO-1 and ANO-2 Specification 6.3. In addition, compliance details relating to the plant specific management position titles fulfilling the duties of these generic positions will be defined, established, documented and updated in a plant controlled document, such as the SAR. This approach is consistent with the intent of GL 88-06 which recommended, as a line item improvement, relocation of the corporate and unit organization charts to licensee controlled documents. The intent of the Generic Letter, and of this proposed change, is to reduce the unnecessary burden on NRC and licensee resources being used to process changes due solely to personnel titles changes during reorganizations. Since this change does not eliminate any of the qualifications, responsibilities or requirements for these personnel or the positions, the change is considered to be a change in presentation only and is therefore administrative. The proposed change is also consistent with NUREG-1430 and NUREG-1432, as modified by generic change TSTF-065, Rev 1 which was approved by the NRC on December 2, 1997.

The respective ANO-1 and ANO-2 requirements for the Vice President, Operations ANO and the General Manager, Plant Operations (ANO-1 and ANO-2 Specifications 6.1.1 and 6.2.1.b) are revised to indicate that these functions are the responsibility of the respective ANO plant

manager. The ANO plant manager responsibilities most closely resemble the responsibilities stated in the NUREG-1430 and NUREG-1432 for an individual unit. The Vice President, a corporate executive, is clearly intended for delineation of the responsibilities identified in ANO-1 and ANO-2 Specification 6.2.1.c. Further, while all three of these positions are responsible for nuclear operation, the responsibilities of both the Vice President and General Manager encompass the entire station (i.e., both units), therefore, the highest level position responsible for unit/facility operation is the respective unit plant manager. Such an assignment of responsibility is also consistent with the position identified for these responsibilities in NUREG-1430 and NUREG-1432, as modified by generic change TSTF-065, Rev 1 which was approved by the NRC on December 2, 1997.

The ANO-1 and ANO-2 requirements for the Vice President, Operations ANO in Specification 6.2.1.c have been revised to indicate that the specified functions are the responsibility of a specified corporate executive whose title shall be documented in the SAR. This change is made for consistency with NUREG-1430 and NUREG-1432, as modified by generic change TSTF-065, Rev 1 which was approved by the NRC on December 2, 1997.

The title associated with ANO-1 and ANO-2 Specification 6.2.2 has been revised to refer to "Unit Staff" instead of "Facility Staff." Since the requirements contained in Specification 6.2.2 are applicable to each unit's staff rather than the entire Arkansas Nuclear One facility, the use of the term "Unit" is more appropriate.

The ANO-1 and ANO-2 requirement for the Manager, Operations to hold a Senior Reactor Operator (SRO) license (ANO-1 Specification 6.2.2 and ANO-2 Specification 6.2.2.h) has been revised to provide allowance for an alternate "operations staff middle manager" to hold the required SRO license. This flexibility is required to provide an alternative to this requirement during periods when the operations manager position is temporarily vacant or staffed with an individual who is not a holder of an SRO license. Typically, the operations staff middle manager would be any supervisory position in the operations staff above the shift superintendent and below the operations manager. Currently, this includes the Coordinator Operations Support and the Supervisor Operations Standards. Either of these individuals, when they are holders of an SRO license, can provide direct support to the operations manager as necessary to fulfill the operations manager's duties. This is considered an acceptable alternative to provide the required qualifications during periods when it is necessary to staff the operations manager position with an individual who is not a holder of an SRO license. This change is made for consistency with NUREG-1430 and NUREG-1432, as modified by generic change TSTF-065, Rev 1 which was approved by the NRC on December 2, 1997.

The ANO-1 and ANO-2 requirement for the Shift Supervisor on duty and/or the designated radiation protection manager to maintain administrative control over locked doors providing access to high radiation areas (ANO-1 Specification 6.11.2 and ANO-2 Specification 6.13.2) have been revised to replace the specific position title of Shift Supervisor with a generic functional description of the shift supervisor. This proposed use of generic personnel titles is

consistent with NUREG-1430 and NUREG-1432, as modified by generic change TSTF-065, Rev 1 which was approved by the NRC on December 2, 1997.

Reduction of Regulatory Duplication

The ANO-1 and ANO-2 Specification 6.4.1 requirements associated with the retraining and replacement training program for the unit staff have been deleted. This information has been removed from the TSs since it duplicates requirements provided in the regulations (10 CFR 50.120). These requirements are also contained in the QAPM, ANO-1 SAR Sections 12.2.2 and 12.2.3 and in ANO-2 SAR Sections 13.2.2 and 13.2.3. Such duplication is unnecessary and results in additional administrative burden to revise the duplicate TS when these regulations are revised. Since removal of the duplication results in no actual change in the requirements, removal of the duplicative information is considered an administrative change. This change is consistent with NUREG-1430 and NUREG-1432.

The ANO-1 and ANO-2 Specification 6.6 requirements associated with reportable event actions have been deleted. This information has been removed from the TS since it duplicates requirements provided in the regulations (10 CFR 50.73). The requirements for Plant Safety Committee (PSC) review of each reportable event (ANO-1 Specification 6.6.2.b and ANO-2 Specification 6.6.1.b) are contained in the QAPM as regulatory commitments (Table 1 item C.8). Such duplication is unnecessary and results in additional administrative burden to revise the duplicate TS when these regulations are revised. Since removal of the duplication results in no actual change in the requirements, removal of the duplicative information is considered an administrative change. This change is consistent with NUREG-1430 and NUREG-1432.

The ANO-1 and ANO-2 Specification 6.8.2 and Specification 6.8.3 requirements related to procedure review and approval and procedure change review and approval have been deleted from the TS. This information provided details of the method of implementation which are not directly pertinent to the actual requirement. Since these details are not necessary to adequately describe the actual regulatory requirement, they can be moved to a licensee controlled document without a significant impact on safety. Placing these details under the control of 10 CFR 50.54(a)(3) provides adequate assurance that they will be maintained. CNRO-98/00013 discusses the incorporation of these items into the QAPM. This change is consistent with NUREG-1430 and NUREG-1432.

The ANO-1 Specification 6.9 and ANO-2 Specification 6.10 requirements related to record retention have been deleted. This information provided details of the method of implementation which are not directly pertinent to the actual requirement. Since these details are not necessary to adequately describe the actual regulatory requirement, they can be moved to a licensee controlled document without a significant impact on safety. These details are proposed to be relocated to the control of 10 CFR 50.54(a)(3). This submittal makes no changes to the relocated requirements other than the regulatory controls governing changes. CNRO-98/00013 discusses the incorporation of these items into the QAPM. This change is consistent with NUREG-1430 and NUREG-1432.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

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 proposed changes only affect the administrative controls contained in Section 6.0 of the Arkansas Nuclear One - Unit 1 (ANO-1) and Unit 2 (ANO-2) Technical Specifications (TSs). The proposed changes either add additional administrative controls, reduce regulatory duplication of requirements consistent with NUREG-1430 "Standard Technical Specifications - Babcock and Wilcox Plants" dated April 1995, and NUREG-1432 "Standard Technical Specifications - Combustion Engineering Plants" dated April 1995, or revise or relocate administrative controls in accordance with NRC guidance. The proposed changes do not affect the operation of any structure, system, or component or the assumptions of any accident analysis. The details relocated from the ANO-1 and ANO-2 TSs, and changes to these details, are controlled under the ANO 10 CFR 50.59 or 10 CFR 50.54 processes as appropriate.

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 proposed changes to the ANO-1 and ANO-2 Section 6.0 administrative controls do not involve a change in the plant design or affect the configuration or operation of any structure, system, or component.

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 proposed changes to the ANO-1 and ANO-2 TSs affect only administrative requirements and do not involve changes to safety limits, limiting conditions for operation, or surveillance requirements on equipment required to operate the station.

Therefore, this change does not involve a significant reduction in the margin of safety.

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

PROPOSED TECHNICAL SPECIFICATION CHANGES

ANO-1