



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

50-313

November 25, 1997

Mr. C. Randy Hutchinson
Vice President, Operations ANO
Entergy Operations, Inc.
1448 S. R. 333
Russellville, AR 72501

SUBJECT: PRESSURIZER SAFETY VALVE OPERABILITY ARKANSAS NUCLEAR ONE,
UNIT 1, (TAC NO. M92069)

Dear Mr. Hutchinson:

NRC Inspection Report 50-313/94-24;50-368/94-24 contains Unresolved Item 313/9424-02. This unresolved item consists of issues related to operability requirements of the Arkansas Nuclear One, Unit 1 (ANO-1) pressurizer safety valves and associated reporting requirements.

As described by the inspection report, both pressurizer safety valves were found out of tolerance during pressure tests in 1993. Valve PSV-1001 was +4.5% out-of-tolerance and valve PSV-1002 was +3.1% out-of-tolerance. It was not clear at the time of the inspection what defines operability of the safety valves and whether a Licensee Event Report was required when the valves were found to be out-of-tolerance. As a result, the issue was designated as an unresolved item.

Technical Specification (TS) 2.2.2 defines safety valve operability in terms of the American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel Code. The Code requires the nominal pressure setting of at least one safety valve to be no greater than the design pressure of the vessel, additional valves may have higher nominal settings, but in no case greater than 105 percent of the design pressure. Standard TSs include a specific value for safety valve setpoints under the Limiting Condition for Operation (LCO) section. The bases section of the standard TSs propose $\pm 3\%$ of the design pressure as the LCO value. The 1970's vintage ANO-1 Technical Specifications do not define operability in terms of safety valve setpoints, however the Bases Section of the TSs discuss safety valve requirements in terms that are currently used in the standard TSs.

In evaluating this matter it was concluded that the primary system integrity and plant safety will be assured if either the ASME or the standard TS safety valve operability criteria are used. The dichotomy between the ANO-1 TS and the TS Bases is significant from the standpoint of defining regulatory operability criteria and determining when to initiate Licensee Event Reports. In all cases, when safety valves are found out-of-tolerance, they are reset to the same acceptable tolerance ($\pm 1\%$ of this design pressure) before the primary system is repressurized.

9712030228 971125
PDR ADOCK 05000313
G PDR

NRC FILE CENTER COPY



Mr. C. Randy Hutchison

- 2 -

The unresolved item identified by Inspection Report 50-313/9424; 50-368-24 is an example of a TS flaw that developed over time due to the evolution of the TS format and content since ANC-1 was licensed. The planned conversion to the standard TSs in 1998 will eliminate this TS deficiency at ANO-1. If your plans to initiate the standard TS conversion process in 1998 change, we recommend that you submit a TS amendment request to clarify safety valve operability requirements.

Pursuant to telephone conversations with Dale James of your staff, it is our understanding that you will take the following actions to resolve this matter:

- (1) Until standard TS are adopted or a license amendment is issued to address this matter, existing TS operability requirements will be interpreted in terms of the standard TSs, i.e. pressurizer safety valves are operable when their lift settings are within +/- 3% of the design pressure.
- (2) Not later than the end of 1998, a conversion to the standard TS will be initiated or a TS amendment will be submitted to clarify the safety valve operability requirements in the existing TSs.

Unresolved Item 313/9424-02 will be closed based on the resolution described above. Notify us immediately if your understanding of the proposed resolution of this matter differs from that set forth above.

Sincerely,



George Kalman, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50 13

cc: See next page

Mr. C. Randy Hutchison

- 2 -

The unresolved item identified by Inspection Report 50-313/9424; 50-368-24 is an example of a TS flaw that developed over time due to the evolution of the TS format and content since ANO-1 was licensed. The planned conversion to the standard TSs in 1998 will eliminate this TS deficiency at ANO-1. If your plans to initiate the standard TS conversion process in 1998 change, we recommend that you submit a TS amendment request to clarify safety valve operability requirements.

Pursuant to telephone conversations with Dale James of your staff, it is our understanding that you will take the following actions to resolve this matter:

- (1) Until standard TS are adopted or a license amendment is issued to address this matter, existing TS operability requirements will be interpreted in terms of the standard TSs, i.e. pressurizer safety valves are operable when their lift settings are within +/- 3% of the design pressure.
- (2) Not later than the end of 1998, a conversion to the standard TS will be initiated or a TS amendment will be submitted to clarify the safety valve operability requirements in the existing TSs.

Unresolved Item 313/9424-02 will be closed based on the resolution described above. Notify us immediately if your understanding of the proposed resolution of this matter differs from that set forth above.

Sincerely,

ORIGINAL SIGNED BY:

George Kalman, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-313

cc: See next page

DISTRIBUTION:

Docket File	PUBLIC	PD4-1 r/f	JRoc	ACRS
JClifford	EAdensam (EGA1)	OGC	GKalman	CHawes
TGwynn, RIV				

Document Name: AR92069.LTR

*See previous concurrence

OFC	PM/PD4-1	LA/PD4-1	RIV*	(A)PD/PD4-1
NAME	GKalman:sp	CHawes C.R.K		JClifford
DATE	10/21/97	10/21/97	7/7/97	Feb 3/97
COPY	YES/NO	YES/NO	YES/NO	YES/NO

OFFICIAL RECORD COPY

Mr. C. Randy Hutchinson
Entergy Operations, Inc.

Arkansas Nuclear One, Unit 1

cc:

Executive Vice President
& Chief Operating Officer
Entergy Operations, Inc.
P. O. Box 31995
Jackson, MS 39286-199

Vice President, Operations Support
Entergy Operations, Inc.
P. O. Box 31995
Jackson, MS 39286-1995

Director, Division of Radiation
Control and Emergency Management
Arkansas Department of Health
4815 West Markham Street, Slot 30
Little Rock, AR 72205-3867

Wise, Carter, Child & Caraway
P. O. Box 651
Jackson, MS 39205

Winston & Strawn
1400 L Street, N.W.
Washington, DC 20005-3502

Manager, Rockville Nuclear Licensing
Framatone Technologies
1700 Rockville Pike, Suite 525
Rockville, MD 20852

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 310
London, AR 72847

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 75011-8064

County Judge of Pope County
Pope County Courthouse
Russellville, AR 72801