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March 3, 1989

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U. S. Nuclear Regulatory Commission  
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Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Unit 2  
Docket No. 50-368  
License No. NPF-6  
NRC Bulletin No. 88-11: Pressurizer  
Surge Line Thermal Stratification

Gentlemen:

As requested by NRC Bulletin 88-11, the purpose of this letter is to inform the staff of actions taken to resolve NRC concerns associated with the issue of Pressurizer Surge Line Thermal Stratification. The Combustion Engineering Owners Group (CEOG), of which AP&L is a member, became aware of this issue in April of 1987 when INPO issued a draft SER on surge line thermal cycling observed in a German nuclear plant. The CEOG proceeded to initiate a data collection program in June 1987 followed by actual data collection activities at two CEOG plants in June and August of 1988.

In October 1988, the CEOG authorized the ongoing CEOG program, "Reduction and Analysis of Pressurizer Surge Line Data Collected from CEOG Plants", to address surge line thermal stratification concerns. NRC Bulletin 88-11 was subsequently issued in December 1988. Action 1.b requested that within four months of receipt of the Bulletin, licensees of plants in operation over ten years demonstrate that the pressurizer surge line meets the applicable design codes and other regulatory commitments for the licensed life of the plant. The staff suggested that this could be accomplished by performing a plant specific or generic bounding analysis. This NRC Bulletin item prompted the CEOG to request a meeting with the NRC staff.

The NRC staff and the CEOG met on February 13, 1989 in the White Flint NRC offices. During this meeting, the CEOG presented the goals and scope of the ongoing CEOG surge line program which included a presentation of actual plant data and a discussion on the issue of thermal striping. The CEOG then requested relief from the schedule requirement in Action 1.b and suggested that the CEOG program be allowed to proceed on schedule.

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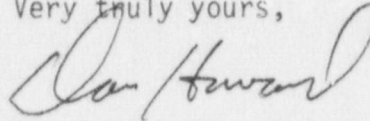
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As a result of this meeting, the CEOG and NRC staff agreed on several action items to be completed as follows:

1. The CEOG will perform a preliminary bounding evaluation of CEOG surge lines using actual data collected from CEOG plants by July 1, 1989. This activity will address the intent of Action 1.b.
2. Actual plant data will be used to define loading conditions for input to the fatigue and stress evaluations.
3. The CEOG agreed to meet with NRC staff to discuss the load definitions prior to finalizing the bounding analysis described in item 1 above.

In conclusion, AP&L's Arkansas Nuclear One, Unit 2 is a participant in the CEOG program and agrees to support the above action items and alternative schedule for responding to NRC Bulletin 88-11, Action 1.b.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Dan Howard", written in a cursive style.

Dan R. Howard  
Manager, Licensing

DRH:MCS:de