



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

T. GENE CAMPBELL
Vice President - Nuclear

August 9, 1989

1CAN088902

*- Craig
For action
F.ved.*

U. S. Nuclear Regulatory Commission
Mail Stop OWFN 13-D-18
Washington, DC 20555

ATTN: Mr. Frederick J. Hebdon
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 -
Addition of Seismic Monitoring Instrumentation

Dear Mr. Hebdon:

Arkansas Power & Light (AP&L) has identified a change to the ANO-1 Technical Specifications (TS) Table 3.5.1-1 and Table 4.1-1 which is necessary to provide consistency between the ANO-1 and ANO-2 Technical Specifications. No Limiting Condition for Operation (LCO) is currently provided in Table 3.5.1-1 for the ANO-1 Seismic Monitoring Instrumentation. The surveillance requirements of Table 4.1-1 Item 42 provide for a quarterly battery check and calibration of the strong motion acceleographs (Seismic Monitoring Instrumentation). The applicable ANO-2 Technical Specification 3/4.3.3 and associated Tables 3.3-7 and 4.3-4 provide for appropriate LCO and Surveillance Requirements. Deletion of channel check, addition of an 18-month test, and change in calibration from quarterly to 18-month is consistent with vendor recommendations for the currently installed equipment, ANO-2 TS and NUREG-0800 Section 3.7.4 "Seismic Instrumentation."

8908240152 890809
FDR ADDCK 05000313
P FDC

*A001
1/1*

Mr. Frederick J. Hebdon

1CAN088902

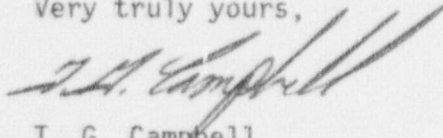
Page 2

August 9, 1989

In accordance with 10CFR50.91(a)(1) and using the criteria in 10CFR50.92(c), AP&L has determined that this change involves no significant hazards consideration. Our basis for this determination and copies of the proposed change are attached for your review. Although the circumstances of this amendment request are neither exigent or emergency in nature, AP&L requests prompt NRC review and approval. Prompt implementation of this proposed change will help ensure consistency between the Technical Specifications of the two units and conformance with NUREG-0800.

Also in accordance with 10CFR50.91(b)(1), a copy of this amendment request and attachments have been sent to Ms. Greta Dicus, Director, Division of Radiation Control and Emergency Management, Arkansas Department of Health.

Very truly yours,



T. G. Campbell

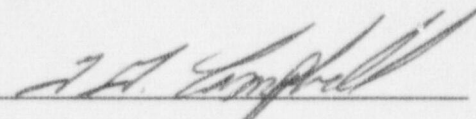
TGC:lw

Attachments

cc: Ms. Greta Dicus, Director
Division of Radiation Control
and Emergency Management
Arkansas Department of Health
4815 West Markham Street
Little Rock, AR 72201

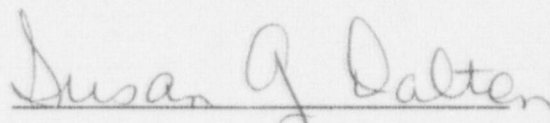
STATE OF ARKANSAS)
) SS
COUNTY OF PULASKI)

I, T. G. 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 1CANØ889Ø2 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.



T. G. Campbell

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 9th day of August, 1989.



Notary Public

My Commission Expires:

May 7, 1993

PROPOSED TECHNICAL SPECIFICATION CHANGE

IN THE MATTER OF AMENDING

LICENSE NO. DPR-51

ARKANSAS POWER & LIGHT COMPANY

ARKANSAS NUCLEAR ONE, UNIT 1

DOCKET NO. 50-313

PROPOSED CHANGE

It is proposed that the following pages of the ANO-1 Technical Specifications be changed as indicated in the revised copy attached to this transmittal:

| | |
|---------------|----------------------------|
| Page 42b | Section 3.5.1.13 |
| Page 43b | Basis for Section 3.5.1.13 |
| Page 45d1 | Table 3.5.1-1 Item 14 |
| Page 45g | Action 27 |
| Page 72a, 72b | Table 4.1-1 Item 42 |

DISCUSSION

The proposed amendment would add the Seismic Monitoring Instrumentation with a measurement range of 0.01 to 1.0 g to Section 3.5.1 Operational Safety Instrumentation. A basis and appropriate FSAR reference will be added to the Basis section for Operational Safety Instrumentation. The specific instrumentation required (Triaxial Time-History Accelerographs, Triaxial Peak Accelerographs and Triaxial Response-Spectrum Recorders) will be added to Table 3.5.1-1 with the annotation "with Unit 1 control room indicator/or alarm" and "with one or more seismic monitoring instruments inoperable for more than 30 days, prepare and submit a Special Report to the Commission pursuant to Specification 6.12.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the instrument(s) to OPERABLE status. The provisions of specifications 3.0.3 and 3.0.4 are not applicable."

The current surveillance requirements in Table 4.1-1 Item 42 will be changed in nomenclature to Seismic Monitoring Instrumentation for clarity (and consistency with ANO-2) and requirements changed to be consistent with Unit 2 requirements, vendor recommendations, and NUREG-0800 Section 3.7.4 (Table 3.7.4-2).

The required instrumentation and testing requirements is in conformance with Safety Guide 12 "Instrumentation for Earthquakes" which provides a basis for the ANO-1 requirements, Regulatory Guide 1.12, "Instrumentation for Earthquakes," and NUREG-0800 Section 3.7.4, "Seismic Instrumentation."

BACKGROUND

The ANO-1 Seismic Monitoring System was licensed under Safety Guide 12, "Instrumentation for Earthquakes." When ANO-2 was licensed, the site equipment was upgraded and the ANO-2 Technical Specification was written in accordance with Regulatory Guide 1.12, "Instrumentation for Earthquakes" and NUREG-0800 Section 3.7.4. The difference in requirements between ANO-1 and ANO-2 has the potential for misinterpretation of surveillance requirements and subsequent surveillance errors (missed or improperly performed) resulting from the differences in the Technical Specifications between the two units. The proposed Technical Specification change will upgrade the ANO-1 Technical Specifications to be consistent with the revision of Regulatory Guide 1.12 applicable to ANO-2 and NUREG-0800.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

In accordance with 10CFR50.92 AP&L has evaluated whether the proposed change involves a significant hazards consideration. AP&L has concluded that the proposed change to add a LCO for the Seismic Monitoring Instrumentation and revise surveillance testing in accordance with the ANO-2 requirements, vendor recommendations, and NUREG-0800 Section 3.7.4 (Table 3.7.4-2) does not involve a significant hazards consideration because operation of Arkansas Nuclear One, Unit 1 in accordance with this change would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change would not alter the probability of any previously analyzed accident occurring. This change adds a Limiting Condition for Operation and reporting requirements not previously included in the ANO-1 Technical Specifications. The changes proposed to testing requirements are consistent with ANO-2 requirements, vendor recommendations, and NUREG-0800. This will not impact the accident-initiating events described in Chapter 14 of the ANO-1 SAR. The proposed change simply adds reporting requirements for inoperability and provides testing consistent with vendor recommendations designed to extend the instrument lifetime.

- (2) Create the possibility of a new or different kind of accident from any previously evaluated.

No new possibility for an accident is introduced by addition of an LCO or providing testing consistency for the Seismic Monitoring Instrumentation. The proposed amendment will not change the overall design and system function of the Seismic Monitoring Instrumentation. The proposed change simply adds an LCO and reduces the possibility of a missed surveillance by providing consistency in testing with ANO-2 surveillance requirements. The surveillance for systems that have only a passive monitoring function does not create the possibility of a new or different kind of accident.

- (3) Involve a significant reduction in the margin of safety.

This change does not involve a significant reduction in the margin of safety; rather, it constitutes an additional LCO requirement not presently included in the ANO-1 T.S. The changes to testing frequency per vendor recommendations will increase the margin of safety by reducing the potential of the equipment being damaged.

The NRC has provided guidance concerning the application of these standards by providing examples of changes involving no significant hazards considerations. The proposed amendment most closely matches the following examples:

- (i) "A purely administrative change to technical specifications: for example, a change to achieve consistency, throughout the technical specifications, correction of an error, or a change in nomenclature." (change in testing requirements - consistency with ANO-2 T.S. Table 4.3-4)

- (ii) "A change that constitutes an additional limitation, restriction or control not presently included in the technical specifications, e.g, a more stringent surveillance requirement" (addition of LCO)

Therefore based on the evaluation discussed above, AP&L has concluded that the proposed change does not involve a significant hazards consideration.