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January 27, 2000

2CAN010003

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

Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Proposed Technical Specification Change Deleting The 18-Month Surveillance of
the Boronmeter Sealed Source

Gentlemen:

Attached for your review and approval are proposed changes to the Arkansas Nuclear One – Unit 2 (ANO-2) Technical Specifications (TS). The proposed changes affect ANO-2 Sealed Source Contamination Surveillance requirements associated with the ANO-2 boronmeter. Specification 4.7.9.1.2.d currently requires the boronmeter source to be tested for loose contamination once every 18 months. The boronmeter source, americium-beryllium, has recently been removed and placed in on-site storage. Therefore, further surveillance testing of this source is not required except under the provisions of Specification 4.7.9.1.2.b "Stored sources not in use", which requires testing prior to its use or prior to being transferred to another licensee, unless tested within the previous 6 months.


The ANO-2 boronmeter was abandoned in-place in 1992 during installation of the station alternate AC diesel generator. The sealed-source contained within the boronmeter, however, was recently removed in October of 1999 and placed in storage. Future testing will be performed on this source pursuant to Specification 4.7.9.1.2.b and the current 18-month testing criteria is being deleted. The next required surveillance date under the current specification is January of 2001. Deletion of Specification 4.7.9.1.2.d will result in radiological dose savings to personnel that would normally be assigned to perform this surveillance activity.

This proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that this change involves no significant hazards considerations. The basis for this determination is included in the attached submittal.

Entergy Operations, Inc. requests approval of the proposed changes by July 1, 2000, with an implementation period of 30 days.

A001

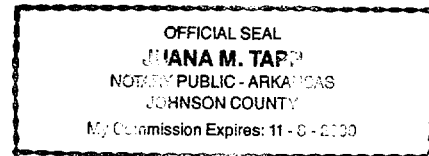
Very truly yours,


CRH/dbb
Attachment

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 Johnson
County and the State of Arkansas, this 27 day of January, 2000.


Notary Public
My Commission Expires 11-8-2000



cc: Mr. Ellis W. Merschhoff
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ATTACHMENT 1

TO

2CAN010003

PROPOSED TECHNICAL SPECIFICATION

AND

RESPECTIVE SAFETY ANALYSES

IN THE MATTER OF AMENDING

LICENSE NO. NPF-6

ENTERGY OPERATIONS, INC.

ARKANSAS NUCLEAR ONE, UNIT ONE AND UNIT TWO

DOCKET NO. 50-368

DESCRIPTION OF PROPOSED CHANGES

The proposed change to the Arkansas Nuclear One, Unit 2 (ANO-2) Technical Specifications (TS) is necessary to eliminate the testing requirements of Specification 4.7.9.1.2.d associated with the boronometer sealed source, which is no longer installed. The source is currently being stored at ANO-2 and tested under the requirements of Specification 4.7.9.1.2.b.

- Delete Surveillance Requirement 4.7.9.1.2.d of Specification 3.7.9.1 on page 3/4 7-28.
- A note is added to the footer of page 3/4 7-28 indicating the next page to be 3/4 7-38. This allows removing nine deleted pages from the TSs. Because this change is administrative in nature, no further discussion will be presented of this change within this submittal.

BACKGROUND

In order to support installation of the alternate AC diesel generator in the early 1990s, the ANO-2 boronometer was abandoned in place to provide the physical space needed for this installation. The americium-beryllium source contained within the boronometer was not removed at that time. Therefore, the surveillance to leak test this source was performed as required by Specification 4.7.9.1.2.d until the source was recently removed (October 1999) and placed in storage under the control of the Radiological Protection department at ANO. Specification 4.7.9.1.2.d requires loose surface contamination testing to be performed for the source installed in the boronometer every 18 months. Because the source has been recently removed from the boronometer, Specification 4.7.9.1.2.d is no longer applicable and, therefore, is proposed for deletion from the TSs.

DISCUSSION OF CHANGE

As discussed previously, the requirements associated with Specification 4.7.9.1.2.d are no longer applicable since the boronometers sealed source has been removed from the instrument and placed in storage. Further surveillance of this sealed source will be as directed by Specification 4.7.9.1.2.b which governs those sources that are not in use. Specification 4.7.9.1.2.b requires this source to be tested for loose surface contamination prior to its next use or prior to being transferred to another licensee. The deletion of Specification 4.7.9.1.2.d does not preclude proper control and testing of the sealed source since other specifications now apply. In addition, radiological dose savings will be realized by eliminating unnecessary surveillance of the sealed source. Therefore, the deletion of Specification 4.7.9.1.2.d is acceptable.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Entergy Operations, Inc. is proposing that the Arkansas Nuclear One, Unit 2 (ANO-2) Operating Licenses be amended to delete current requirements of Technical Specification (TS) 4.7.9.1.2.d "Source installed in the Boronometer" associated with the installed boronometer sealed source. Because the source was recently removed and stored, the requirements of Specification 4.7.9.1.2.d are no longer applicable. Being removed from service, the testing of this source remains controlled under the requirements of Specification 4.7.9.1.2.b "Stored sources not in use." Therefore, deletion of Specification 4.7.9.1.2.d is acceptable.

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 modification performed on the boronometer removed its sealed source and placed the source in safe storage. The removal of this source from plant systems removes the possibility of contamination or radiological exposure from this source to personnel working on or near the boronometer. Since the source has been placed in safe storage, no change in the probability or consequences of an accident previously evaluated is evident.

Therefore, the proposed 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 relocation of the boronometers sealed source to safe storage has not resulted in any new or different kind of accident from any previously evaluated. The proposed deletion of Specification 4.7.9.1.2.d furthermore does not remove all controls from the subject source. While maintained in storage, the requirements of Specification 4.7.9.1.2.b will govern testing of the sealed source should it be placed in service or transferred to another licensee in the future.

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 relocation of the borometers sealed source to safe storage does not impact the margin to safety. Controls are currently established governing sources that are stored and not in use. Therefore, deleting the current requirements of Specification 4.7.9.1.2.d does not result in a reduction in the margin to safety. Furthermore, deletion of this surveillance requirement will act to reduce radiological exposure to personnel that would normally be assigned to perform this activity.

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

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

ENVIRONMENTAL IMPACT EVALUATION

10 CFR 51.22(c) provides criteria for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration, (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released off-site, or (3) result in a significant increase in individual or cumulative occupational radiation exposure. Entergy Operations, Inc. has reviewed this license amendment and has determined that it meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the proposed license amendment. The bases for this determination is as follows:

1. The proposed license amendment does not involve a significant hazards consideration as described previously in the evaluation.
2. As discussed in the significant hazards evaluation, this change does not result in a significant change or significant increase in the radiological doses for any Design Based Accident. The proposed license amendment does not result in a significant change in the types or a significant increase in the amounts of any effluents that may be released off-site.
3. The proposed license amendment does not result in a significant increase to the individual or cumulative occupational radiation exposure because this does not modify the method of operation of systems and components necessary to prevent a radioactive release.

PROPOSED ANO-2 TECHNICAL SPECIFICATION CHANGES

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

1. With a half-life greater than 30 days (excluding Hydrogen 3), and
 2. In any form other than gas.
- b. Stored sources not in use - Each sealed source and fission detector shall be tested prior to use or transfer to another licensee unless tested within the previous six months. Sealed sources and fission detectors transferred without a certificate indicating the last test date shall be tested prior to being placed into use.
- c. Startup sources and fission detectors - Each sealed startup source and fission detector shall be tested within 31 days prior to being subjected to core flux or installed in the core and following repair or maintenance to the source or detector.
- 4.7.9.1.3 Reports - A report shall be prepared and submitted to the Commission on an annual basis if sealed source or fission detector leakage tests reveal the presence of ≥ 0.005 microcuries of removable contamination.

MARKUP OF CURRENT ANO-2 TECHNICAL SPECIFICATIONS

(FOR INFO ONLY)

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

1. With a half-life greater than 30 days (excluding Hydrogen 3), and
 2. In any form other than gas.
- b. Stored sources not in use - Each sealed source and fission detector shall be tested prior to use or transfer to another licensee unless tested within the previous six months. Sealed sources and fission detectors transferred without a certificate indicating the last test date shall be tested prior to being placed into use.
 - c. Startup sources and fission detectors - Each sealed startup source and fission detector shall be tested within 31 days prior to being subjected to core flux or installed in the core and following repair or maintenance to the source or detector.
 - d. ~~Source installed in the Boronometer - This sealed source shall be tested for leakage at least once per 18 months.~~
- 4.7.9.1.3 Reports - A report shall be prepared and submitted to the Commission on an annual basis if sealed source or fission detector leakage tests reveal the presence of ≥ 0.005 microcuries of removable contamination.

DELETED

PLANT SYSTEMS
 3/4-7-10 FIRE SUPPRESSION SYSTEMS
 FIRE SUPPRESSION WATER SYSTEM
 TIMING CONDITION FOR OPERATION

~~PLANT SYSTEMS~~

~~ACTION (continued)~~

~~DELETED~~

DELETED

SURVEILLANCE REQUIREMENTS (continued)

PLANT SYSTEMS

~~PLANT SYSTEMS~~

~~SURVEILLANCE REQUIREMENTS (Continued)~~

~~DELETED~~

~~PLANT SYSTEMS~~

~~SPRAY AND/OR SPRINKLER SYSTEMS~~

~~LIMITING CONDITION FOR OPERATION~~

DELETED

DELETED

SURVEILLANCE REQUIREMENTS

PLANT SYSTEMS

DELETED

LIMITING CONDITION FOR OPERATION

FIRE HOSE STATIONS

PLANT SYSTEMS

~~TABLE 3.7-7~~

~~FIRE HOSE STATIONS~~

DELETED

DELETED

LIMITING CONDITION FOR OPERATION

3/4-7-11 FIRE BARRIERS

PLANT SYSTEMS