



ARKANSAS POWER & LIGHT COMPANY
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

May 19, 1981

ØCANØ581Ø7

Mr. G. L. Madsen, Chief
Reactor Operations & Nuclear Support
Office of Inspection & Nuclear Support
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Subject: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Response to Inspection Reports
50-313/81-06 and 50-368/81-05
(File: 0232, 2-0232)

Gentlemen:

We have reviewed the Items of Noncompliance included in the subject reports. Attached is our response to the following "Notice of Violation".

Very truly yours,

David C. Trimble
Manager, Licensing

DCT:GAC:s1

cc: Mr. Victor Stello, Jr., Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

8108040163 810713
PDR ADOCK 05000313
Q PDR

STATE OF ARKANSAS)
) SS
COUNTY OF PULASKI)

I, DAVID C. TRIMBLE, being duly sworn, subscribe to and say that I am
the Manager of the Licensing Section, for Arkansas Power & Light Company;
that I have full authority to execute this oath; that I have read the
foregoing ØCANØ581Ø7 and know the contents thereof;
and that to the best of my knowledge, information and belief the
statements made in it are true.

David C. Trimble
DAVID C. TRIMBLE

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County
and State above named, this 19 day of May, 1981.

Glenway Charles
NOTARY PUBLIC

MY COMMISSION EXPIRES:

12-20-82

5

APPENDIX A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted during the period March 2-13, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A. Criterion V of 10 CFR Part 50, Appendix B, states that activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures.

Licensee Procedure 1023.08 requires that licensed operators shall review the abnormal and emergency operating procedures not less than twice each year.

Contrary to the above, for Unit 1, one licensed operator had not completed a review of abnormal and emergency operating procedures in 16 months; another operator had not completed the review in 28 months; and two other operators had not completed the review in 33 months. For Unit 2, one operator had not reviewed abnormal and emergency operating procedures in 13 months, and another operator had not completed the review in 15 months.

This is a Severity Level V violation (Supplement I.E.).
(313/8106-01; 368/8105-01)

RESPONSE:

All but one individual has completed a review of abnormal and emergency procedures. The remaining individual, a non-shift license holder, will not perform license duties until requalification requirements of Procedure 1023.08 are successfully completed.

To prevent recurrence, in the future letters of notification will be written to personnel that are late in returning review sheets. If action is not then taken, a Non-Conformance Report (NCR) will be written to document the lack of review and require corrective action.

Full compliance has been achieved.

- B. For Unit 1, Licensee Technical Specification 4.10.2 covering surveillance of the Control Room Emergency Air Conditioning and Isolation System states:

"At intervals not to exceed 18 months, automatic initiation of the Control Room Emergency Air Conditioning and Isolation System shall be demonstrated to meet the requirements of Specification 3.9."

Subsection 3.9.1 of Specification 3.9 states:

"The dampers shall isolate the Control Room within 10 seconds after receipt of a high radiation signal."

Contrary to the above, Licensee Procedure 1104.34, Revision 2, governing the conduct of this test does not specify or document that the dampers isolate the control room within 10 seconds. The procedure does document that air is available to operate the dampers to isolate the Control Room, and that the dampers are closed, but not the timing of closure within 10 seconds.

This is a Severity Level V violation (Supplement I.E.).
(313/8106-02)

RESPONSE:

AP&L does not agree with your determination that Procedure 1104.34 does not specify or document the dampers isolate the Control Room within 10 seconds. The Unit 1 Control Room isolation dampers cannot be verified closed by visual observation due to damper design. The design, along with the required closure time, was addressed to the damper vendor in 1976. The vendor replied in a letter dated June 6, 1977, that the dampers would close in less than 5 seconds with a 20 psi supply pressure based on the proposed design. The assurance that the dampers were closed was addressed in a letter dated October 10, 1977, from the vendor. Following vendor verification, the modification was made to the Unit 1 Control Room isolation dampers which combined the Unit 1/Unit 2 Control Room isolation system with features to verify isolation times.

A Technical Specification Change Request was submitted to the NRC addressing the Unit 1 Control Room dampers isolation time and changes necessary to upgrade to Unit 2 requirements. After submittal of this request, verbal approval was obtained from the NRC on February 24, 1978, in a telephone conversation between Mr. D. Snaider (NRC) and Mr. Dave Mardis (AP&L). Formal approval was issued by the NRC in Technical Specification Amendment No. 32, dated March 24, 1978. We believe the present method for verifying closure and the closure time is acceptable based on previous vendor verification and NRC review and is not a violation.

- C. Criterion V of 10 CFR Part 50, Appendix B states that activities affecting quality shall be prescribed by documented instructions and shall be accomplished in accordance with these instructions.
1. For Unit 1, Licensee Procedure 1004.12A states that, "all surveillance calibration, checks, inspections, tests required by Section 4 of the Technical Specifications are specified on the Master Test Control List" (Attachment A to Procedure 1004.12).

Contrary to the above, certain surveillances required by Section 4 of the Technical Specifications are not specified

on the Master Test Control List, but are specified on the Unit 1 Reactor Plant Tests and Frequency List.

RESPONSE:

Procedure 1004.12A was deficient for it did not address the use of the Reactor Plant Test and Frequency List and the Master Test Control List. A new Procedure 1001.09, "Master Test Control List", was issued on April 17, 1981, incorporating Technical Specification Section 4 surveillance requirements.

Full compliance has been achieved.

2. Licensee Procedure 1000.06, Revision 2, "Procedure Review, Approval and Revision Control", requires the independent reviewer for safety-related procedures to complete Form 1013.02M, "Deletion to Station Procedures", if the procedure reviewed supersedes any other procedure.

Contrary to the above, the licensee issued Procedure 1305.06, Revision 0, "Integrated Engineered Safety System Test", for Unit 1 without completion and issuance of Form 1013.02M for superseded Procedure 1304.08, Revision 3.

RESPONSE:

Form 1013.02M, "Deletion to Station Procedures", has been completed to reflect that Procedure 1304.08, Rev. 3, has been superseded by 1305.06, Rev. 0. A check has been completed of the working copies of ANO Operating Procedures. Superseded procedures have been deleted utilizing Form 1013.02M. In order to prevent recurrence, Form 1000.06B, "Procedure/Work Plan Request", has been revised (Revision 3) and now contains a check-off indicating if the proposed procedure or revision supersedes or replaces another procedure. Instructions are also contained on Form 1000.06B further stating that Form 1013.02M is to be completed and attached to Form 1000.06B if the proposed procedure or revision supersedes or replaces another procedure.

Full compliance has been achieved.

3. For Unit 1, Licensee Procedure 1004.12A, Revision 6, Change 2, in Attachment B, limits the surveillance test periodicity for calibration of the hydrogen concentration instrument to an "interval not to exceed 18 months".

Contrary to the above, at the time of the inspection these instruments had not been calibrated since April 19, 1979, an interval exceeding 18 months.

This is a Severity Level V violation (Supplement I.E.)
(313/8106-03)

RESPONSE:

AP&L does not agree with your determination that intervals between tests is a violation. The basis for your determination is that the surveillance interval may not be adjusted plus or minus 25 percent when Technical Specifications use a statement, "not to exceed 18 months". Section 4 of Unit 1 Technical Specification states, "Specified surveillance intervals may be adjusted plus or minus 25 percent to accommodate normal test and surveillance schedules." No exceptions are taken in the specification cited that prevents applying plus or minus 25 percent. It is our position that plus or minus 25 percent is allowed unless specifically excluded in a applicable specification. This position is validated by comparing Unit 2 Standardized Technical Specification 4.0.2 which allows a plus 25 percent adjustment to specified surveillance intervals. When a 25 percent adjustment is not allowed, the following statement is used: "The provisions of Specification 4.0.2 are not applicable" (Unit 2 T.S. 4.6.1.2.g).

Based on the above, it is AP&L's position that the NRC allows the use of plus or minus 25 percent unless a specific exception is taken to the surveillance intervals.

- D. For Unit 1, Technical Specification 4.11, "Penetration Room Ventilation System Surveillance", subparagraphs 4.11.1 and 4.11.4a state:

"4.11.1 At intervals not to exceed 18 months, the pressure drop across the combined HEPA filters and charcoal absorber banks shall be demonstrated to be less than 6 inches of water at system design flow rate ($\pm 10\%$).

4.11.4a The tests and sample analysis of Specification 3.13.1a, b, & c shall be performed at intervals not to exceed 18 months or after every 720 hours of system operation and following significant painting, fire or chemical release in any ventilation zone communicating with the system."

Contrary to the above, the licensee had these tests performed on or about August 31, 1977; April 24, 1979; and January 19, 1981; the resulting intervals between tests exceeds the requirement of "not to exceed 18 months".

This is a Severity Level IV violation (Supplement I.D.2).
(313/8106-04)

RESPONSE:

AP&L does not agree with your determination that intervals between tests is a violation. The basis for your determination is that the

surveillance interval may not be adjusted plus or minus 25 percent when Technical Specifications use a statement, "not to exceed 18 months". Section 4 of Unit 1 Technical Specification states, "Specified surveillance intervals may be adjusted plus or minus 25 percent to accommodate normal test and surveillance schedules". No exceptions are taken in the specification cited that prevents applying plus or minus 25 percent. It is our position that plus or minus 25 percent is allowed unless specifically excluded in an applicable specification. This position is validated by comparing Unit 2 Standardized Technical Specification 4.0.2 which allows a plus 25 percent adjustment to specified surveillance intervals. When a 25 percent adjustment is not allowed, the following statement is used: "The provisions of Specification 4.0.2 are not applicable", (Unit 2 T.S. 4.6.1.2.g).

Based on the above, it is AP&L's position that the NRC allows the use of plus or minus 25 percent unless a specific exception is taken to the surveillance interval you cited.