



ARKANSAS POWER & LIGHT COMPANY
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June 11, 1981

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Mr. G. L. Madsen, Chief
Reactor Operations & Nuclear Support
Office of Inspection & Enforcement
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
50-313/81-11 and 50-368/81-10
(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

David C. Trimble
Manager, Licensing

DCT:GAC:s1

Attachment

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

8108040412 810702
PDR ALUCK 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 Letter No. ØCANØ681Ø2 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 12 day of June, 1981.

Glenn O. Charles
NOTARY PUBLIC

MY COMMISSION EXPIRES:

12-20-82

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of March 22 - April 21, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. Unit 2 Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering . . .
 - a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33."

Operating Procedure 2102.10, "Plant Shutdown and Cooldown" has been established in accordance with this Technical Specification.

Step 8.29 to this procedure establishes Low Temperature Overpressure (LTOP) protection for the Reactor Coolant System (RCS) by stating, "When RCS temperature is 200°F, disable and lock out all HPSI Pumps, Containment Spray Pumps, and all but (1) Charging Pump, and caution tag HPSI and charging pump hand switches to prevent inadvertent operation as required for LTOP protection." Additionally, this procedure requires that each step be initialed by an operator to indicate its completion.

Contrary to the above, on March 30, 1981, with RCS temperature approximately 150°F and Step 8.29 to Procedure 2102.10 initialed complete, all three Charging Pump hand switches were found to be selected to the "AUTO" position instead of having at least two of the handswitches selected to the "STOP" position which would have disabled the Charging Pumps as required.

This constitutes a Severity Level V Violation (Supplement I.E.) (368/8110-1).

RESPONSE:

An investigation of the circumstances of apparent violation 368-8110-01 has revealed that all but one charging pump was placed in "Pull-to-Lock" per procedure requirements during the actual RCS cooldown. After the cooldown was completed and the RCS vented, the RCS was partially drained and filled several times for the purpose of lowering RCS activity levels in preparation for refueling.

Following this drain and fill evolution, the inspector noted the apparent violation. The shift operators immediately repositioned the control switches to "Off", thus inhibiting Auto Start.

In order to expedite the fill and drain operations, two charging pumps were used in conjunction with an open ECCS vent. Previous discussions with NRC have documented that this method provides adequate overpressure protection. The investigation has failed to disclose conclusively whether or not the ECCS vent was open at the exact time the apparent violation occurred, but in all likelihood the vents would have remained open during this part of the evolution.

In an effort to prevent reoccurrence, all caution tags on the pump control switches were rewritten shortly thereafter to more accurately explain LTOP requirements. Long-term corrective action will be afforded by the installation of pressurizer LTOP relief valves, a design package currently being installed during the Unit 2 refueling outage.

AP&L is presently in full compliance.

2. Unit 2 Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering . . . b. Refueling operations."

Operating Procedure 2502.01, Refueling Shuffle, has been established in accordance with this Technical Specification.

Step 7.8 of this procedure contains the following note:

"CAUTION: WHEN INSERTING FUEL ASSEMBLIES INTO THE REACTOR CORE, NOTE COUNT RATE BEFORE AND AFTER INSERTION, OBSERVE PRECAUTION 4.24 AND LOG THE COUNT RATE IN THE BLANKS PROVIDED ON ATTACHMENT D."

Contrary to the above, on April 21, 1981, the Control Room operator did not note and record neutron count rate when fuel assembly AKC 303 was inserted into core position A-8.

This constitutes a Severity Level V Violation (Supplement I.E.) (368/8110-2).

RESPONSE:

On April 21, 1981, while performing core alterations, it was noted that the Control Room operator did not note and record the neutron count rate when Fuel Assembly AKC 303 was inserted into the core.

The Fuel Loading Data was reviewed and indicated no predictive indications that involved criticality approach. The operator on duty was immediately informed of the procedural requirement and its basis. Subsequently, operators on all crews having responsibility for documenting the count rate requirement were questioned and all responses were satisfactory and illustrated an awareness of the requirement.

Extensive conservatisms in the refueling configuration and safety analyses, coupled with backup means reactor surveillance and the actual count rate documentation have assured that the problem is one of documentation rather than reactor safety.

This occurrence is the first incident involving count rates. Preparatory briefings associated with the onset of each refueling procedure will constitute refresher training and provide reasonable assurance of preventing reoccurrence.

Compliance was achieved on 4/21/81.

3. Unit 2 Technical Specification 3.7.10.2 requires that a continuous fire watch with backup fire suppression equipment be established within one hour if the Cable Spreading Room sprinkler is not operable.

The Unit 2 Cable Spreading Room sprinkler system was rendered incapable of automatic operation on March 30, 1981, when valve 2FS-61, the fire water supply to the room, was tagged shut to prevent inadvertent actuation of the sprinkler during maintenance activities in the room.

Contrary to the above, although a fire watch had been previously stationed in accordance with the above Technical Specification, the fire watch was not continuous in that the NRC inspector found that no fire watch was stationed at 2:35 p.m. on April 2, 1981.

This constitutes a Severity Level IV Violation (Supplement I.D. 2) (368/8110-3).

No response to this item is required, since the appropriate corrective action was taken and was reviewed by the inspector during the inspection period.

4. Unit 1 Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented and maintained covering . . .
a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33."

Administrative Procedure 1000.13, Control of Station Modifications, has been established in accordance with this Technical Specification.

Step 6.4.2 of this procedure requires that upon issuance of the test copy of a Design Change Package (DCP), Plant Engineering shall mark the first generation sepias of the plant drawings to indicate those portions of the drawings affected by the design change. Affected areas are to be circled (bubbled) and "DCP No. _____ Pending" is to be entered in the revision block. Drawings, thus revised, are to be distributed within the plant. The intent of the procedures is that the revised drawings be distributed within several days after DCP test copy issuance.

Contrary to the above, on March 25, 1981, the below listed plant drawings in the Unit 1 Control Room were not marked to indicate pending design changes, even though the design changes had been completed by that date:

<u>Drawing No.</u>	<u>DCP No.</u>	<u>DCP Test Copy Issue Date</u>
M204	79-1033	12/30/80
M210	80-1135	01/24/81
M210	80-1180	01/28/81
M231	81-1011	02/14/81
M230	80-1004	01/14/81

This constitutes a Severity Level V Violation (Supplement I.E.) (313/8111-1).

RESPONSE:

Unit 1 outstanding DCP packages, including those listed above, have been forwarded to Plant Engineering for bubbling as of May 26, 1981.

Upon completion of bubbling by Plant Engineering, the bubbled drawings will be reproduced and distributed. This effort will be complete by 7/1/81.

A decision has been reached to relocate the original drawing mylars from the Corporate Office (Little Rock) to the plant site. The relocation will require that additional facilities be constructed at the plant site and additional manpower obtained. The relocation will enable the entire drawing revision process to be accomplished at the plant site under the control of Plant Engineering. This will improve the timeliness and control of the drawing revision process. The estimated completion date for this effort is December 31, 1981, at which time full compliance will be achieved.