



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

July 27, 1981

ØCANØ7811Ø

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



SUBJECT: Qualification of Inspection,
Examination, and Testing and
Audit Personnel
(Generic Letter 81-01)
(File: 1510.3, 2-1510.3)

Gentlemen:

Based on our review of Generic Letter 81-01 dated May 4, 1981, we have elected to address how we meet the criteria given in Regulatory Guides 1.58 Revision 1, and 1.146. Attached is our response to the subject letter which endorses our position to meet regulatory guide commitments.

Very truly yours,

David C. Trimble
for David C. Trimble,
Manager, Licensing

DCT:GAC:kb

Attachments

cc: Messrs. D. G. Horton
L. W. Schempp

8108050124 810727
PDR ADOCK 05000313
P PDR

MEMBER MIDDLE SOUTH UTILITIES SYSTEM

AOA
5/11

RESPONSE TO
REGULATORY GUIDE 1.58,
REVISION 1 AND
REGULATORY GUIDE 1.146

1.a "Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel."

- C.5 States "In addition, the individual should be capable of reviewing and approving inspection, examination and testing procedures and of evaluating the adequacy of such procedures to accomplish the inspection, examination, and test objective."

APL-TOP 1A Rev 5 Appendix A amends ANSI N45.2.6-1973 to read "The individual shall also be capable of reviewing and approving inspection, examination and testing procedures and of evaluating the adequacy of activities to accomplish the inspection, examination, and test objectives.

Wording of the two is identical except "activities" is used in place of "such procedures" in the topical. The intent is the same, therefore, AP&L is meeting the regulatory position C.5.

- C.6 States, "In addition ..., the candidate should be a high school graduate or have earned the General Education Development equivalent of a high school diploma."

APL-TOP-1A Rev. 5 Appendix A which has been reviewed and approved by NRC makes provisions for personnel who have not graduated from high school or who have earned an associate degree. In addition, AP&L recognizes the General Education Development equivalent of a high school diploma.

- C.7 Adds to the performance section, "These personnel should have sufficient training to ensure an acceptable level of competence in the performance of their activities."

Procedure 1000.23, "Quality Control Program" addresses commitments made in appendix A of APL-TOP 1A (Rev. 5) and clarifies AP&L's position in this matter. 1000.23 states "AND intends to use those individuals best qualified to perform inspection/verification of safety related equipment ... Provisions will be made to qualify and certify individuals to accommodate specific situations.

Therefore, AP&L meets the regulatory position C.7.

C.8 AP&L has an ALARA program to meet the requirements of Regulatory Guide 8.8 and therefore regulatory position C.8 is being met.

C.10 Addresses ... "Use of the measures outlined in these sections to establish that an individual has the required qualifications in lieu of required education and experience should result in documented objective evidence (i.e., procedures and records of written test) demonstrating that the individual indeed does have "comparable" or "equivalent" competence to that which would be gained from having the required education and experience."

Procedure 1004.04, "QC Qualification and Certification" and 1004.05, "Quality Control Training Program" identify methods for documented objective evidence to demonstrate individual competence in lieu of education and experience. Therefore AP&L meets regulatory position C.10.

1.b "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants."

Arkansas Power & Lights program for qualification and certification of Quality Assurance Auditors and Lead Auditors meets entirely the requirements of ANSI N 45.2.23-1978 as interpreted by Regulatory Guide 1.146 (August 1980). AP&L has documented this qualification and certification program in Quality Assurance Administrative Procedure QAA-2 Rev. 0.

AP&L will specifically commit to Regulatory Guide 1.146 in Revision 6 of our Quality Assurance Manual Operations APL-TOP-1A.