



**Entergy
Operations**

Entergy Operations, Inc.

Route 3 Box 1370

Fayetteville, AR 72801

TEL 501-964-3100

April 29, 1994

OCAN049407

U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Response to Inspection Report
50-313/93-11; 50-368/93-11

Gentlemen:

Pursuant to the provisions of 10CFR2.201, attached is the response to the violation (50-368/9311-02) identified during the inspection of activities associated with failure to update operating instructions for the Unit 2 emergency diesel generator following the implementation of a plant change.

Per discussions with Mr. Tom Stetka of NRC Region IV, Arkansas Nuclear One's (ANO's) response to the Notice of Violation concerning improper procedure adherence (50-313/9311-01) will be delayed until May 18, 1994. This delay will allow ANO adequate time to perform an independent assessment of the control rod drive cooling water failure event.

Should you have questions or comments, please call me at 501-964-8601.

Very truly yours,

Dwight C. Mims,
Director, Licensing

DCM/slp

Attachments

9405030079 940429
PDR ADDCK 05000313
PDR

LEO1
11

U. S. NRC
April 29, 1994
PAGE 2

cc: Mr. Leonard J. Callan
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

NRC Senior Resident Inspector
Arkansas Nuclear One - ANO-1 & 2
Number 1, Nuclear Plant Road
Russellville, AR 72801

Mr. George Kalman
NRR Project Manager Region IV/ANO-1
U. S. Nuclear Regulatory Commission
NRR Mail Stop 13-H-3
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Mr. Thomas W. Alexion
NRR Project Manager, Region IV/ANO-2
U. S. Nuclear Regulatory Commission
NRR Mail Stop 13-H-3
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

NOTICE OF VIOLATION

During an NRC inspection conducted on December 26, 1993, through February 5, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and be accomplished in accordance with these instructions, procedures, or drawings.

Procedure 6000.030, Revision 7, *Control of Installation*, Step 5.4.4, requires that operating procedures which are affected by modifications are identified and revised.

Contrary to the above, on January 14, 1994, Procedure 2104.036, Revision 36, *Emergency Diesel Generator Operations*, had not been revised to include drain valves on three starting air compressors. The physical installation of these valves was accomplished under Plant Change 92-8024, which was implemented in March 1993.

This is a Severity Level IV violation (Supplement I) (368/9311-02)

Response to violation 368/9311-02

(1) Reason for the violation

Due to moisture build-up in the Emergency Diesel Generator (EDG) starting air systems, three low point drain valves were installed on the EDG air compressors and are to be operated periodically to drain moisture accumulation in the low point of the compressors.

To limit the number of outages on the EDG air compressors, the installation of the drain valves was accomplished during the quarterly preventive maintenance activity of each compressor. As a result, these valves were installed during a four month period from November 1992 to March 1993. After the installation was completed, the responsible System Engineer did not verify the valves were added to the appropriate operating procedure. The System Engineer did initiate a Procedure Improvement Form (PIF) to revise the appropriate operating procedure after the final drain valve was installed; however, the PIF did not specify that these were new valves and the PIF was not properly prioritized to indicate it was needed to reflect current plant configuration.

The Modifications Department procedures were not clear regarding the actions required for the installation of the drain valves. The root cause of this event is inadequate procedures and controls as they relate to non-outage plant changes (PCs) initiated and implemented by System Engineering. The plant changes that

are affected are a small percentage of all PCs since most PCs are implemented during outages when adequate controls are in place.

Additionally, a contributing cause was that the responsible System Engineer was not cognizant of administrative requirements and follow-up actions required for new equipment installation.

(2) Corrective steps taken and results achieved:

Procedure 2104.036, *Emergency Diesel Generator Operations*, was revised to include the three drain valves in the valve lineup and to add operating instructions for the drain valves.

A review of Unit 1 and Unit 2 System Engineering generated PCs and LCPs known to be installed and not closed was performed to ensure that necessary drawing updates and Operations procedure revisions were completed.

Procedure 6010.003, *Limited Change Package and Plant Change Development*, was revised to more accurately and clearly describe the specific requirements for turnover of work performed by a PC to Operations and closing open PCs.

This event was discussed with Unit 2 Operations shift personnel. In addition, training was provided to them regarding the need to ensure that configuration control has been established after the installation of new components.

(3) Corrective steps that will be taken to prevent further violations:

Open Unit 2 Operations Department PIFs were reviewed by Operations personnel to determine if there were any procedure revisions that had not been incorporated in a timely manner. An additional independent review of incorporation of PIFs in a timely manner will be conducted by Quality Assurance (QA). This independent review will be completed by June 15, 1994.

ANO will perform a review of the methods for identifying procedural changes and the effectiveness of the modification process for alerting Operations procedure writers regarding the scope of modifications. This evaluation will be completed by June 1, 1994. The results of this review will be used to determine whether a more in-depth evaluation of the modification related procedure change process is warranted.

Unit 1 and 2 System Engineering personnel will receive training on the changes made to Procedure 6010.003 to ensure that they are aware of the actions required before PC's and LCP's are released to Operations or other responsible organization. These actions will be completed by May 30, 1994.

Training on the need to maintain configuration control after the installation of new components will be provided to Unit 1 Operations shift personnel by June 30, 1994.

(4) Date when full compliance will be achieved

Full compliance for this event was achieved on January 25, 1994, when Procedure 2104.036, *Emergency Diesel Generator Operations*, was revised to include the three drain valves in the valve lineup and to add operating instructions for the drain valves. Full compliance to correct the overall condition will be accomplished on June 30, 1994, when training is complete.