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March 19, 1993

OCAN039303

U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Units 1 & 2
Dockets Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Update on Status of Historical Commitments

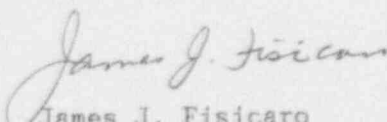
Gentlemen:

The ANO Historical Review Project (HRP) is reviewing past NRC correspondence for commitments. To date, correspondence from 1985 to the present has been reviewed and the status of identified commitments has been obtained. During this effort, commitments have been identified for which ANO's docketed position requires clarification or change. Enclosed is a summary of 14 items identified by the HRP as needing clarification/change. These items were previously discussed with Region IV during teleconferences held February 17, 1993, March 3, 1993, and March 17, 1993.

Certain commitments are included in this report only because the group or procedure implementing the commitment has changed. Insignificant administrative changes of this type are not an intent change and will not be included in future reports.

Guidelines are in place to assure changes to commitments identified during the HRP are considered for any safety significant implications. The commitment changes identified in this report were reviewed against the guidelines and were not considered to have any safety significant implications. No action is being requested from the NRC on any items from this report. Should you have any questions, please contact me.

Very truly yours,


James J. Fisicaro
Director, Licensing

JJF/KJM/klc

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enclosure

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U. S. NRC
March 19, 1993
OCAN039303 Page 2

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Commitments for Operational and Administrative Controls on the DSS Contactor By-Pass Circuit Breakers

2CAN028906, ANO-2 ATWS Request of Additional Information Supplemental Response, provided a discussion of the administrative controls placed on opening and closing of the Diverse Scram System (DSS) contactor by-pass circuit breakers. We stated, "The DSS system will be placed in service with the contactor by-pass breakers open prior to entry into Mode 1 as defined in the Unit 2 Technical Specifications." This statement requires clarification in that the reference to the Unit 2 Technical Specifications applies to the definition of Mode 1, not to the DSS system being included in Technical Specifications. DSS is not in the Unit 2 Technical Specifications.

In the same discussion a commitment was made to add "an operational and administrative controls warning label" to the DSS by-pass breaker cubicle which summarized administrative controls. The administrative controls listed in 2CAN028906 are part of the DSS and DEFAS Operations Procedure and it is the use of this procedure during system realignment which administratively controls DSS. A warning label is not needed and assuring that such a placard would remain in place adds an unnecessary task on Unit 2 Operations. ANO is rescinding the commitment for an administrative warning label in the DSS by-pass breaker since this administrative control is redundant to approved operations procedures.

Commitment For Waste Control Operator to Perform Fire Door Check

In response to Violation 50-368/7829-02, ANO committed to the following in 2-029-18 (February 23, 1979):

On January 25, 1979, the Operations Superintendent directed the operators to check the status of all safety related fire doors in their routine plant tours. In addition, the Waste Control Operator (controlled access area) will record on his log sheet that fire doors have been checked once per shift. This action will be completed by March 1, 1979.

At the time this commitment was made, ANO-2 had been licensed to operate approximately six months. Construction related activities were still ongoing in the Auxiliary Building and this increased the potential of finding fire doors open without a fire watch assigned. Due to the increased awareness of requirements for a Fire Watch, the Operations' fire door check became a daily log rather than shiftly.

Currently the duty of performing safety-related fire door checks is the responsibility of the Waste Control Operator and other operators as is appropriate for the door locations. (Safety related fire doors requiring checks were determined to be those which separated safety-related fire areas or portions of redundant shutdown systems. Doors which are alarmed or monitored by a fire watch are not part of the daily check.) To allow operators to spend more time in support of plant operations, this check is being reassigned to the roving fire watches, who patrol the Turbine Building

and Auxiliary Buildings for potential fire concerns. ANO is revising the 1979 commitment to reflect a daily log of safety-related fire door status to be completed primarily by the fire watches and by other groups under unusual circumstances. This change will still meet the intent of the original commitment without unnecessary use of operator time.

Commitment for Training Form Used to Cross Check NRC Forms 396 and 398 for Accuracy

In OCAN038917, a commitment was made that required the ANO Training Department to complete a checklist for NRC Forms 396 and 398 before sending the forms to the NRC. This commitment was in response to two minor errors on license applications in March 1989. Checklist TF-53 was created in response to this commitment. The required accuracy checks from TF-53 have resulted in no further errors since March 1989. However, until the Correspondence Review Project identified TF-53 as a commitment, the checklist itself had been discontinued. The checklist was reinstated when it was identified as a commitment, even though it now serves no useful purpose.

TF-53 is very basic and performs no function other than reminding the Administrative Technicians to check the forms for correctness prior to submittal. The original intent of the commitment was to assure that forms submitted to the NRC were complete and accurate. Since 1989, the operating environment at ANO has changed significantly with respect to the importance of attention to detail. Four individuals would have to overlook an error on these forms in order for them to be submitted incorrectly under our current process. In light of this fact and our record of accuracy for the last three years our commitment to a reminder checklist is being rescinded.

Commitment to Forward Valve Line-Up Exception Sheets to Operations Technical Supervisor for Procedure Changes

In OCAN028705 ANO stated, "The Conduct of Operations procedure has been revised to require that the valve exception sheets be forwarded to the Operations Technical Supervisor for review and initiation of procedure changes." This commitment was in response to Violation (313/8622-01) which cited ANO for valve line-ups not being maintained up to date.

The practice of forwarding exception sheets to Operations Technical Support for later procedure revisions has changed over time. Conduct of Operations now requires a procedure change to be written for exceptions to valve line-ups. This fulfills the intent of the original commitment and is actually an enhancement to it. Under our current procedure, valve line-ups are corrected prior to heat-up rather than waiting until Operations Technical Support processes a procedure revision. Our commitment from OCAN028705 is being modified by this letter to match current practices, which we feel exceed the original controls.

Commitment to Review Engineering Action Requests (EARs)
for Potential Safety/Operability Concerns

An NRC Enforcement Conference was held January 23, 1989, on Control of Work Activities, Design Configuration Control, and Timeliness of Corrective Actions. As part of the slide presentation, ANO stated that a system would be developed and implemented within Design Engineering to evaluate emerging work items (Engineering Action Requests) to identify and address potential safety/operability concerns. This commitment was also transmitted to the NRC as an attachment to OCAN028902, dated February 9, 1989.

This commitment to evaluate for potential safety/operability concerns was instituted for EARs sent to the AP&L Design Engineering group in Little Rock, Arkansas. At the time of this commitment, the Condition Reporting (CR) system had only recently been implemented and EARs could still have been written to document conditions affecting the safety of the plant. Since that time, Design Engineering has been relocated to the ANO plant site and personnel have been trained repeatedly on the need to write a CR for any deficient condition. The CR system has provisions for an operability assessment within its process. This safety/operability review for EARs was discontinued based on the above reasons.

There are also levels of review within the EAR process which further negate the need for a safety/operability review.

1. The cognizant System Engineering Managers and the Plant Manager review all non-administrative EARs originated by the Plant and Design Engineering prior to issuance. Administrative EARs would not address any safety significant conditions.
2. Once an EAR is received in Design Engineering, it is prioritized utilizing the Capital Review Board (CRB) priority system.

Should the priority of an EAR indicate a significant safety concern, a CR would be written.

Based on the widespread use of the CR system with its attendant operability review and additional defense in depth reviews within the EAR process, it is our position that current processes meet the intent of the original review commitment. We do not believe that reinstating a special safety/operability review for EARs would increase our sensitivity to conditions affecting the safety of the plant. The commitment to have a "system developed and implemented within Design Engineering to evaluate emerging work items (Engineering Action Requests) to identify/address potential safety/operability concerns" is rescinded.

Commitment to Provide Written Logs for Turnover of Job Activities

Licensee Event Report (LER) 50-313/88-023-00, was submitted April 7, 1989, concerning inadequate work controls which resulted in a non-isolable reactor coolant system leak. As part of the longer term corrective actions for this event, ANO committed to "a revision of procedures to improve control of maintenance activities by addressing: attendance at pre-job briefings, written logs for turnover of job activities...." This corrective action was accomplished by Revision 2 to 1025.002, Maintenance Department Organization and Responsibilities and Revision 29 to 1025.003, Conduct of Maintenance. These revisions added specific steps delineating how the "Daily/Shift Log should be maintained."

OCAN058901, submitted May 5, 1989, in response to Violation (313/8838-02) and Enforcement Action 88-284 specifically committed ANO to written logs for turnover of maintenance responsibilities. In this response ANO stated:

Specific procedure changes have also been implemented to provide for a systematic method of carrying out these expectations. For example, the conduct of maintenance procedures have been revised to emphasize overall responsibility to properly complete work before turning it over to operations. Included in this revision are requirements to conduct and attend thorough pre-job briefings, requirements to provide written logs for turnover of job activities....

In the same response, AP&L also stated that management and organization changes were planned at ANO to improve accountability and place the two units under separate managers "to make management more focused to meet the day to day needs of two different units."

It was determined after implementation of the organizational changes above that a written shift log proved to be cumbersome and was redundant to systems already in place (i.e. System Information Management System (SIMS) updates and the work performed section of the Job Orders). The improvements in ownership (due to unitization), job order process, and tracking systems caused the written Daily/Shift Log to be of no added value. Consequently, Revision 36 to 1025.003, Conduct of Maintenance, and revision 4 of 1025.002, Maintenance Department Organization and Responsibilities, deleted specific instructions for a written Daily/Shift Log. The same revision to 1025.003 condensed and clarified the turnover process while still addressing the option of written turnover when needed. This is in keeping with the wording found in our original LER commitment.

The responsibility for proper turnover is consistent with maintenance expectations as stressed in the "Maintenance Management Principles Handbook" developed as part of the ANO Business Plan. Stringent requirements for written turnover are considered excessive given the emphasis placed by ANO on individual responsibility for quality. To clarify our docketed response in this case, ANO will continue to comply with the intent of the wording in our original response, LER 50-313/88-023.

Commitment to Conduct Radwaste Processing, Packaging and Transport Training Annually

Item 6 of IE Bulletin 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial," requires licensees to "conduct periodic retraining to those employees who operate the processes which generate waste to assure that the volume of low-level radioactive waste is minimized and that such waste is processed into acceptable chemical and physical form for transfer and shipment to a low-level radioactive waste burial facility."

In response to this item, ANO committed in OCAN117909 to provide annual retraining in radwaste processing, packaging and transportation. ANO has been providing this retraining within the committed time interval.

Due to the infrequency of changes to radwaste processing systems, and to regulations affecting these systems, as well as packaging and transportation of radwaste, ANO intends to change the retraining frequency to biennial, rather than annual. ANO has received no inspection findings related to radwaste training.

Commitment For a Second Set of Procedures at the Dosimetry Work Station

In OCAN088606, response to Violation (313;368/8616-01), ANO committed that, "a second set of procedures has been assigned to the dosimetry supervisor to be located at the secondary work station. Additionally, both the primary and secondary work stations will be on distribution for appropriate forms used in the performance of their work." This was to prevent the use of outdated procedures for the setup and operation of personnel thermoluminescent devices (TLDs), the subject of the violation. This corrective action has been maintained.

ANO's on-site dosimetry program for personnel exposure monitoring was accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) in January 1988. As part of this accreditation, ANO agreed to place a copy of dosimetry procedures in the immediate vicinity of each TLD reader. This was in addition to the primary and secondary dosimetry work space procedures already present.

In an organization committed to quality, it is more appropriate to base an action on maintaining a standard of excellence rather than on a corrective action from an isolated incident. The standards with which ANO must comply in order to maintain our NVLAP accreditation are more restrictive than our corrective actions from the 1986 violation. For these reasons ANO considers the above commitment in response to Violation 313;368/8616-01 to be superseded by NVLAP accreditation.

Commitment for QA Programs Group To Be Responsible for Maintaining QA Qualification and Training Records

During NRC Inspection 88-26 ANO was cited for the inability to locate training and qualification records for a QA Auditor. In OCAN018905, Response to Violation (313;368/8826-04), ANO committed:

The responsibility for control and maintenance of the QA Training/Qualification records has been specifically assigned to the QA Programs Group. This group will be responsible for assuring that the procedural and regulatory requirements pertaining to QA Training/Qualification are complied with and that such records are adequately maintained and retrievable.

The commitment above, if read literally, would require a permanent internal QA program group with the responsibility of records maintenance. This was not our intent. The "QA Programs Group" (as designated at the time) verified that the training QA records were in order and copied these records to the ANO permanent record document control center. These actions were taken as corrective steps to prevent recurrence. The term "QA Programs Group" was being used internally by QA to differentiate between audit groups at the time.

QA qualification/training record maintenance is covered by approved plant procedures and endorsed by the Quality Assurance Manual Operations section 2.6.7. Any changes that might degrade these controls would have to be submitted to the NRC for prior approval under 10 CFR 50.54(a)(3). Without the artificial "QA Programs Group" designation, the OCAN018905 commitment adds nothing to strengthen our implementation of 10 CFR 50 Appendix B requirements for records maintenance. The OCAN018905 commitment is therefore unnecessary and is rescinded.

Commitment to Record Reason if Change Was Made in a Test Setup

Unresolved Item (313/8847-04) involved the failure to record why permanent pump gauges were replaced with temporary test gauges during tests. The inspector's concern was that operators routinely replaced permanently installed indication with test gauges without any explanation noted in the test procedure. This item was closed in Inspection 90-17 to changes in Engineering procedures for in-service testing. These changes would require a note on test data sheets if a change was made in the test setup.

This commitment requires modification in its implementation. The note that required an explanation for a change in test setup still exists as committed; however, it is not part of Engineering procedures. In the process of preparing the Engineering procedure changes, it was determined to be inappropriate to include operations related changes in Engineering procedures. Unit One Operations agreed and revised their procedures accordingly. Guidance requiring an explanation when using alternate indication is still a part of Unit One Operations' procedures. ANO will continue to satisfy this commitment from Unresolved Item 313/8847-04 in Unit One Operations' procedures rather than Engineering procedures.

Commitments for Procedure Writers Guide (PWG) Reviews and Workshops

Violation (313/8618-02; 368/8619-02) was identified in June 1986 concerning procedural deficiencies which could result in performance errors. This was a Level V violation with five examples, all minor in nature. Improvements to the ANO procedural requirements program were underway at the time of the inspection, but were not available for NRC review. OCAN038707 submitted information regarding program improvements including the development and implementation of Procedure Writer's Guides (PWG) for Operations and Maintenance.

In the closeout review for this violation (OCNA098815) the Inspector made the following statements which need clarification:

The plant operations and maintenance departments both have procedures which require each member to review the writer's guides periodically. The maintenance department procedure (1025.008, "Control of Maintenance Procedure Writer's Guide") also requires a signoff sheet to be filled in each time a member reads the guide. A workshop is periodically held to keep members up to date.

These statements could be interpreted as commitments concerning the writers guides and do not accurately reflect PWG contents.

Maintenance procedure writers are required to have read the PWG within the last six months. This applies only to procedure writers, not every member of maintenance. Also, there is no signoff sheet to document the review. At the time the inspector reviewed the PWG (1025.008), 1025.009 Attachment 2 (Procedure Verification Checklist) repeated the requirement to have reviewed the PWG. There was no signoff required as documentation of the review.

Operations' procedures are required to be written in accordance with the Operations PWG. This implies that the procedure writer is familiar with the PWG; however, there is no requirement for periodic review of the PWG. ANO does not consider periodic review of the PWG to be a commitment.

In addition, maintenance PWG workshops were being held at that time for the purpose of initial familiarization with the PWG concept and were not intended to be an ongoing program.

Due to the above concerns with the write-up of the violation closure, ANO is resending commitments to the PWG as described in OCNA098815.

Commitment for a Control Room Operator to Transfer Maximum
Flow Rate to Effluent Release Appendix

Licensee Event Report 50-313/88-007 concerned radioactive liquid effluent releases that exceeded the Technical Specification limit due to a personnel error. LER corrective actions included revising radioactive liquid releases procedures "to provide clarifications that will reduce the possibility of future errors of this type." The procedure change added steps for transferring circulating water pump flow rates from Attachment B to Attachment C of 1104.20, Clean Waste System Operation. This transfer of data was to be accomplished by "control room staff" which included both licensed and non-licensed operators at the time. This requirement has remained the same in the intervening years.

While reviewing the ANO response to Enforcement Action 88-284 it was discovered that the wording from the LER commitment had been interpreted differently in the presentation slides. The slide stated, "Control Room Operator will transfer maximum flow rate from preliminary report to appendix used by Waste Control Operator." This would imply that a licensed operator was used to transfer the data, which is not the case.

The original intent of the commitment was to ensure that the maximum flow rate data was recorded on the attachment used by the Waste Control Operator. This has been successfully accomplished since the original LER commitment by both licensed and non-licensed operators. The knowledge level of the non-licensed personnel performing liquid radioactive releases is ensured through training and qualification. Operations considers this level of knowledge adequate to perform the transfer of flow data between attachments. The commitment from the response is being modified to conform with the original LER commitment and allow either licensed or non-licensed operators to transfer the flow data.

Commitment to Include a Note Explaining the Purpose of As-Left Data

In response to Violation (368/8426-01), Failure to Follow Safety-Related Special Maintenance Procedure, ANO committed to the following:

To emphasize the need for measuring and recording an as-left condition, a note was added just prior to the applicable steps. This note explains the purpose for which as left data is obtained is to insure that maintenance activities have not adversely affected parameters. In addition, special training on adherence to procedures was conducted for the electrical maintenance group.

Current procedures are much more detailed concerning recording as-found and as-left data. This data is currently part of the acceptance review. The attitude toward adherence to procedures has also improved dramatically in the nine years since the violation occurred. Because of this change in attitude and improved procedure quality, the note committed to in our response, OCAN118404, is no longer necessary. ANO is rescinding our commitment to a procedural note explaining the reason for as-left data.

Commitment to Provide Systems Training to General Plant Employees

In OCAN088001, Arkansas Power and Light identified a number of actions planned to improve overall training at ANO. As part of this improvement program, ANO committed to provide General Employee Systems Training to new employees within twelve months of beginning work at ANO. ANO also committed to increase the size of the training department and support the development of individual training programs.

ANO's early action plan and initial increase in staff led to our current program which has eleven INPO accredited training programs. Organizational groups represented by these programs include: Licensed and Non-Licensed Operator Training, Chemistry Training, Health Physics Training, Engineering Training, Mechanical Maintenance Training, Electrical Maintenance Training, and Instrument and Control Maintenance Training. Each of these programs provides a more in-depth study on plant systems than originally committed in 1980. Because of the depth and extent of training, new employees may not complete this training within twelve months.

The intent of the original program outlined in OCAN088001 was to improve the overall quality of training at ANO. Our current achievements in INPO accreditation demonstrate that we meet this intent. In-depth training targeted at plant organizations that interface directly with systems seems to be our best use of training resources. For these reasons, ANO's 1980 commitment for General Employee Systems Training to be provided within twelve months is being rescinded.