



ARKANSAS POWER & LIGHT COMPANY

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March 30, 1982

2CAN038212

Mr. W. C. Seidle, Chief
Reactor Project Branch #2
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Additional Information on
Inspection Report 50-368/81-24
on Operability Specification
(File: 2-0232)

Gentlemen:

We have reviewed the Item of Noncompliance included in the subject report and interpreted in a letter from your Mr. Robert A. Clark and Mr. John F. Stolz to Mr. William Cavanaugh III dated January 25, 1982 (0CNA018211). Attached is our response to the "Notice of Violation" included in the subject report.

Very truly yours,

John R. Marshall
Manager, Licensing

JRM:LDY:s1
LDY

cc: Mr. Richard C. DeYoung
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Norman M. Haller, Director
Office of Management & Program Analysis
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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NOTICE OF VIOLATION

Arkansas Power and Light Company
Arkansas Nuclear One, Unit 2
Docket: 50-368/81-24

Based on the results of an NRC inspection conducted during the period of July 22 - August 21, 1981, and in accordance with the Interim Enforcement Policy 45FR66754 (October 7, 1980), the following violation was identified:

2. Unit 2 Technical Specification Limiting Condition for Operation 3.8.2.5 states, "All containment penetration conductor overcurrent protective devices shown in Table 3.8-1 shall be OPERABLE."

Surveillance Requirement 4.8.2.5a requires that certain containment penetration conductor overcurrent protective devices shown in Table 3.8-1 be demonstrated OPERABLE every 18 months.

Technical Specification 4.0.3 states, in part:

"Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation...."

Technical Specification 6.9.1.9b requires, in part, that a written report be submitted to the Director of the Regional NRC office within thirty days describing the conditions leading to operation in a degraded mode permitted by a Limiting Condition for Operation.

Contrary to the above, the licensee did not submit to the Director of NRC Region IV within thirty days a written report describing the conditions discovered on June 26, 1981, that led to operation in a degraded mode permitted by Limiting Condition for Operation 3.8.2.5. Specifically, on June 26, 1981, the licensee determined that Surveillance Requirement 4.8.2.5a had not been performed since September 12, 1978, and therefore, had not been performed in the specified time interval (every 18 months). In accordance with Technical Specification 4.0.3, the affected containment penetration conductor overcurrent protective devices then became technically inoperable until Surveillance Requirement 4.8.5a was successfully completed on June 27, 1981.

This constitutes a Severity Level IV Violation (Supplement I.D.4) (368/8124-02).

Response:

In the NRC letter of January 25, 1982, NRR states, "although the wording of the current ANO-2 Technical Specifications states that successful surveillance tests are sufficient to establish OPERABILITY, they are not explicitly stated to be necessary to establish OPERABILITY." The NRC letter dated February 17, 1982, indicates that NRR's interpretation of ANO-2 Technical Specifications in the January 25, 1982, letter would support the NRC Regional Staff conclusion that the above is still a Severity Level IV, AP&L disagrees. After reviewing the above, AP&L feels that our interpretation of the existing Technical Specification is valid. However, in order to alleviate any future concerns in this area, AP&L plans to submit a Technical Specification Change in accordance with your January 25, 1982, letter. Our schedule for submittal of the proposed Technical Specification changes on ANO-1 and 2 is May 14, 1982. In the interim AP&L will utilize the interpretation given in the January 25, 1982, NRR letter.