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

May 13, 1982

ØCANØ582Ø7

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 - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Response to Inspection Reports
50-313/82-05 and 50-368/82-05
(File: 0232, 2-0232)

Gentlemen:

We have reviewed the Items of Noncompliance included in the subject reports. Attached is our response to the "Notice of Violation" and "Notice of Deviation" included in these reports.

Very truly yours,

John R. Marshall

John R. Marshall
Manager, Licensing

JRM:GAC:sc

Attachment

cc: Mr. Richard C. DeYoung, Director
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

STATE OF ARKANSAS)
) SS
COUNTY OF PULASKI)

I, John R. Marshall, being duly sworn, subscribe to and say that I am Manager, Licensing for Arkansas Power & Light Company; that I have full authority to execute this oath; that I have read the document numbered ØCANØ58ØØ7 and know the contents thereof; and that to the best of my knowledge, information and belief the statements in it are true.

John R. Marshall

John R. Marshall

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 14 day of May, 1982.

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 1-31, 1982, and in accordance with the Interim Enforcement Policy 45 FR 66754 (October 7, 1980), the following violations were identified:

1. Unit 2 Reactor Protection Channel Not Tripped When Required

   Unit 2 Technical Specification 3.3.1.1 requires that the reactor protective instrumentation channels of Table 3.3-1 shall be operable. This table requires that three of the four channels of Linear Power Level-High be operable in Mode 1, and refers to Action Statement number two. This action statement provides that power operation may continue with one of the four channels inoperable, provided that the inoperable channel is bypassed or tripped within one hour and either restored to operable status or tripped within 48 hours from the initial loss of operability.

   Contrary to the above, on March 22, 1982, with the unit operating in Mode 1, the Channel C excore nuclear instrumentation had been inoperable for more than 48 hours, but the Channel C Linear Power Level-High was not tripped. This condition was observed by the NRC inspector at 1610 hours, and the channel was tripped by the licensee at 1630 hours.

   This is a Severity Level IV Violation. (Supplement I.D.2) (368/8205-01)

   RESPONSE

   The affected channel was tripped earlier in order to comply with T.S. 3.3.1.1. However, during the corrective maintenance the circuit was powered down which removed trip indication. After Inspector observation, the affected channel was determined to be in an untripped condition (not simply loss of status indication power), and was tripped by lowering the channel setpoint. Later, the bistable comparator card was removed for log and linear power trips for that channel to assure the trip could not be reset without specific and deliberate operator action.

   The apparent cause of this incident was lack of awareness of the electrical design which removes certain trip relay power when the excore drawer is powered down.

   Instructions for the method of establishing the required channel trip condition per technical specification action requirements have been posted on each RPS channel, requiring the associated trip bistable comparator card to be removed to assure channel trip. Such action should preclude the possibility of inadvertent reset during future manual channel trips.

   Full compliance has been achieved.

2. Two of Three Unit 1 High Pressure Injection Pumps Inoperable

Unit 1 Technical Specification 3.3.2 requires that two of the three High Pressure Injection pumps shall be maintained operable when the Reactor Coolant System temperature is greater than 350F and irradiated fuel is in the core.

Contrary to the above, the licensee reported in Licensee Event Report 82-003/03L-0 that the oil was changed in Pump P-36A while Pump P-36C was out of service, resulting in having only one High Pressure Injection Pump operable on January 28, 1982.

RESPONSE

As was stated in the cover letter transmitting I.E. Report 82-05, a written response is not required for this event as it was provided in LER 82-003/03L-0.

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted during the period of March 1-31, 1982, and in accordance with the Interim Enforcement Policy 45 FR 66754 (October 7, 1980), it appears that one of your activities was not conducted in accordance with your commitments to the Commission, as indicated below:

Testing Per IE Bulletin 80-06 Not Performed As Committed

Arkansas Power and Light Company, in a letter to the Commission, dated June 18, 1980, stated that a test had been completed to verify that the actual installed instrumentation and controls are consistent with the schematics reviewed in response to Item 1 of IE Bulletin 80-06.

Contrary to the above, the required testing had not been completed as of March 31, 1982.

This is a deviation from a written commitment to the Commission. (368/8205-02)

RESPONSE:

On April 8, 1982, members of AP&L staff and NRC Region IV staff met in Arlington to discuss AP&L's letter dated June 18, 1980, and subsequent testing as required by IE Bulletin 80-06. As stated in this meeting, AP&L has reviewed certain matters, brought to our attention by the resident inspector, and had found that documentation could not be located to substantiate that all of the required testing had been completed. We further stated in a telephone conversation on April 9, 1982, that we would do a complete re-review of the requirements in IE Bulletin 80-06.

To insure that all ES actuated devices were examined by the re-review, each Electrical Schematic Diagram was reviewed and the "ES" components evaluated with regard to IE Bulletin 80-06.

The review was conducted by members of the Plant Staff and the Energy Supply Electrical Engineering Section. The review was conducted in the phases described in the following paragraphs.

PHASE I: In this phase of the review program, electrical engineers reviewed each Electrical Design Schematic and made a determination as to whether or not an "ES" signal was used on that particular schematic drawing. The results of this review were documented on Scheme Review Tables for each series of schematic drawings. A second electrical engineer was assigned to perform an independent review of each schematic and all differences between these reviews were resolved to the satisfaction of both engineers.

PHASE II: Following completion and verification of Phase I activities, a component specific review was conducted of each schematic containing ES actuated components as identified on the Scheme Review Tables. The

results of this phase were documented on a "Component Review Sheet" for each "ES" component.

Each component was evaluated by an engineer according to the following steps:

1. The component is in its non-ES state (position) initially.

2. An ES signal is received and the component changes to its ES state (position).

3. The ES signal is reset (removed).

4. What action, if any, does the component take when the "ES" signal is removed.

If the component returns to its pre-ES state with specific, positive operator action, the component was determined to "fly back." This determination was noted in the column headed "Flyback Yes/No" on the Component Review Sheet.

Once this determination was made, an independent review was conducted by another engineer and all discrepancies were resolved prior to completion of the review. This independent review further ensured that all components reflected on the schematic were transferred to the Component Review Sheet.

Once this review was completed, an additional cross check was performed by the Plant Engineering Superintendent to verify that the original and independent reviews were completed.

PHASE III: A cross check was conducted against a draft Engineering Drawing, E-2024, which lists "ES" components by actuating relay. As each component was identified on the Component Review Sheet, the corresponding component was marked on E-2024.

PHASE IV: The original draft of Work Plan 2409.14 which was prepared in April of 1980 was compared to the results of the review as an additional cross check.

PHASE V: As a cross verification of the completeness of the Engineered Safety Features System Response Time Test, Procedure 2304.127, Rev. 4 (draft) was checked against the results of the 80-06 re-review.

NOTE: All discrepancies between components listed in the cross checking documents used in Phases III, IV and V were resolved prior to final review.

PHASE VI: The Phase I through V reviews resulted in a listing of all ES actuated components which were separated into five categories as outlined in our April 16, 1982, letter. Component by component evaluations were then performed on those categories for which we could not locate testing

documentation to assess the safety implications appropriate to the category as outlined in our April 16, 1982, letter. This phase also involved extensive review by the Plant Safety Committee and the Safety Review Committee.

The above reviews were completed and summarized in our letter of April 16, 1982. That letter details the engineering review and identifies all discrepancies between the re-review and original review.

The original work plan which was drafted in 1980 to do this testing was revised to incorporate changes made to components since its original draft and to incorporate all discrepancies identified in our re-review. This work plan was performed between April 19, 1982 and April 27, 1982.

The results of this testing indicated that, with the exception of two components, all components tested as expected. The two components (2RE-8231-1 and 2RE-8271-2) were determined in Phase II to exhibit flyback characteristics, however, the testing demonstrated that these components would not flyback. A further review of the schematic for these components indicated that the components performed correctly and should not flyback.

Also, as stated in our April 16, 1982 letter, several components were identified in our re-review where it was determined that "flyback" would occur and that modification to prevent this was appropriate. These modifications were completed during our Unit 2 shutdown from April 16, 1982 to April 29, 1982. These components were also tested and found to respond properly.

AP&L believes that, as a result of the thorough re-review, modifications, and testing, ANO-2 is in full compliance with the requirements of IE Bulletin 80-06. In addition, this process has verified that there were no safety problems associated with this matter.

Since June of 1980, when the letter identified in this Notice of Deviation was transmitted, AP&L has made substantial changes in its approach to the review and control of letters and commitments to the NRC. Most letters to the NRC are now reviewed by the ANO Special Projects Staff and others at ANO, as appropriate, prior to transmittal. Most letters to NRC are also reviewed by the Manager, Licensing and his staff. In addition, letters containing a commitment for further action at ANO and replies to inspection reports are reviewed by the Assistant Vice President, Nuclear Operations.

AP&L has also been using various tracking systems at ANO and in the Licensing Section to monitor commitments to the NRC. These systems, along with a program of Quality Assurance audits of commitment implementation begun at the last refueling outages of ANO-1 (March 1981) and ANO-2 (June 1981), have enhanced our ability to track commitments to NRC.

Even before the matter involving IE Bulletin 80-06 arose, AP&L had made plans to further improve our handling of NRC requirements. We are now developing a formal Energy Supply Major Program, called the Regulatory

Response Program, which will establish responsibilities within AP&L related to regulatory requirements and will elaborate on AP&L's philosophies on handling regulatory requirements. This progarm will be supported by formal implementing procedures which will use common approaches at ANO and the Little Rock General Office. The program will also include Quality Control inspections and Quality Assurance audits at a regular frequency. Implementation of this program is currently scheduled to begin by June 30, 1982, with supporting procedure development and implementation continuing through December 31, 1982.

In addition to the Regulatory Response Program and implementing procedures, AP&L implemented on April 30, 1982, a new centralized commitment tracking system for common use at ANO and Little Rock. This system features a single point of control over commitments and includes multiple sorting and reporting capabilities for use in controlling commitments. The system also allows supporting actions and responsibilities which are necessary to carry out a commitment to be identified. This system will be reviewed by AP&L Management periodically and updated, as appropriate.

AP&L believes that the above actions will substantially improve our ability to fulfill commitments made to the Commission. In order to provide further assurance that these actions will provide such improvement, the Safety Review Committee has appointed a special audit team to conduct an audit of the circumstances involving the IE Bulletin 80-06 matter. This special audit will also assess our programs for controlling such commitments and will provide recommendations for additional corrective action if appropriate. This audit is currently scheduled to be completed by May 25, 1982, with a report issued in mid-June. The results of this audit will be reviewed by the Safety Review Committee and AP&L Management such that responsibilities and schedules for additional corrective action can be developed if appropriate.

References:

1) Letter (2CAN048208) William Cavanaugh III to John T. Collins dated 4/16/82

2) Letter (0CNA048203) John T. Collins to William Cavanaugh III dated 4/9/82