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

February 3, 1983

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Mr. John T. Collins
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

SUBJECT: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
INPO Report and Status Report in
Response to Notice of Violation and
Confirmatory Order

Gentlemen:

Attached is the INPO assessment of the Regulatory Response and Commitment Control Program and the activities of the Plant Safety Committee and Safety Review Committee. This report is submitted in response to Mr. Richard C. DeYoung's letter and Order of January 18, 1983, (2CNAØ183Ø5) and satisfies the requirement of Article IV on page six of the Order.

As discussed with your Mr. William Johnson, our letter of January 14, 1983, (ØCANØ183Ø3) should serve as the basis for the required monthly status report on the progress of the Regulatory Response and Commitment Control Program activities we have under way. The monthly status report as required by the Order will be issued by February 14, 1983.

Very truly yours,

John R. Marshall
Manager, Licensing

JRM:RR:sc

Attachment

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

INPO

Institute of
Nuclear Power
Operations

1100 Circle 75 Parkway
Suite 1500
Atlanta, Georgia 30339
Telephone 404 953-3600

1-12-83

January 7, 1983

Mr. William Cavanaugh, III
Senior Vice President
Energy Supply
Arkansas Power & Light Company
P. O. Box 551
Little Rock, AR 72203

Dear Mr. Cavanaugh:

At your request, we arranged for a special assistance visit to Arkansas Power & Light Company from December 13 through 16, 1982. I asked our representatives to return to INPO and discuss their thoughts with other experienced personnel before we developed substantial recommendations and provided these recommendations in writing.

Attached is their report to me. This report is provided to you wholly independent of our evaluation program. It is intended solely for your assistance and use as desired.

I hope you find this information useful. Please do not hestitate to contact me, or to have your staff contact Claude Cross or Joe Flynn directly on this matter.

The additional information that was requested by your staff during our visit will be provided as it becomes available.

Sincerely,

A. C. Tollison, Jr.
Director
E&A Division

ACT/ds

cc: Mr. Jerry L. Maulden
Mr. Jack Richard
Mr. E. P. Wilkinson

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January 7, 1983

A. C. Tollison, Jr.
J P Flynn for
Claude C. Cross

ASSISTANCE TO ARKANSAS POWER
AND LIGHT COMPANY (AP&L)

1. As a result of a request from Mr. William Cavanaugh, III, Senior Vice President Energy Supply, AP&L, a special assistance team visited AP&L from December 13 through 16, 1982. The purpose of the special assistance visit was to perform an independent assessment of activities at AP&L in the areas of nuclear safety review and commitment control. The assistance team consisted of the following members:

   Claude Cross - Team Manager
   Joe Flynn
   Ray Hardwick
   Terry Sullivan
   Bernie LaPorcala

2. In the area of nuclear safety review, we were requested to address the following questions as they pertain to the Plant Safety Committee (PSC) and the off-site Safety Review Committee (SRC).

   a. Is the information provided to the committees adequate?

   b. Has the information provided been subjected to adequate technical review/quality checks before submittal to the committees?

   c. Are the committees reviewing information from an appropriate perspective to evaluate overall nuclear safety considerations?

   d. Are the committees being utilized properly, or are they being diverted from truly important safety tasks?

   As a result of interviews with PSC and SRC members and attendance at a regularly scheduled PSC meeting and an SRC meeting, the assistance team identified several recommendations regarding these questions. A summary of these recommendations is as follows:

   - Continue to improve the quality of PSC minutes.
   - Expedite efforts to provide trended data to the PSC and SRC.
   - Evaluate the need to have the PSC review all the information currently provided for review.
   - Separate the management issues from the PSC tracking system.
   - Consider the use of "ballot" reviews for some PSC items.

- o Review PSC membership to determine if appropriate individuals are included as members or as members of subcommittees.
- o The SRC management audits are effective and should be continued.
- o Provide training for SRC members.

3. In the area of commitment control we were requested to focus our assessment on the action plans developed by AP&L in Phase I of the regulatory response and commitment control program to determine if these plans adequately addressed the objectives and goals of the program. Additionally, we were requested to make a determination as to whether or not the objectives and goals of the program are appropriate.

   As a result of interviews with corporate and plant management personnel, the assistance team identified several recommendations in the area of commitment control. A summary of these recommendations is as follows:

   - o Correlate the action plans more closely with the program goals and objectives.
   - o Address the action plans involving system engineers and PSC action tracking as separate issues.
   - o Action plans should include and identify which items are short term or interim, as well as long-term items.
   - o Standard system development and life cycle methodologies should be considered in action plans involving computer hardware and software.
   - o If a passive commitment tracking program is undertaken, it should be clearly defined and established to ensure company-wide utilization.
   - o The identification of licensing points of contact should be documented as soon as possible.
   - o Consider addressing the responsibility and accountability action plan as a "high" priority item in lieu of a "medium" priority item.
   - o Consider the review of existing procedures to ensure that overall commitment control is adequately addressed.

   Several areas were noted where the positive steps already taken appear to be effective in accomplishing the major program objectives. These areas include:

   - o Development and implementation of the Licensing Information Request (LIR) has improved communications between the Licensing Department and other departments on regulatory response matters.

   - o Establishment of the FSAR and license-basis document data base has provided a simplified method of performing reviews for such items as past commitments and the impact of system modifications on commitments.

   - o Increased management emphasis has resulted in staff awareness of responsibilities related to conducting meaningful reviews of regulatory responses and commitments to ensure clarity and specificity.

4. It is recognized by the assistance team that some of the recommendations above have been previously identified by members of AP&L. The details of our recommendations are attached.

5. While some of our thoughts were discussed with Mr. Cavanaugh and the plant manager, we did not give them firm recommendations, or any recommendations in writing, during the special assistance visit.

6. We have also agreed to provide AP&L with additional information on the following subjects:

- o Example(s) of a checklist to be used to ensure adequate procedure reviews
- o Examples of effective PSC minutes
- o Names of plants that have received technical specification relief such that the PSC is not required to review all safety-related procedure changes
- o Names of plants that have effective PSC "ballot" review programs
- o Names of plants that have effective surveillance programs
- o Additional information on types of trended information that might be useful to the SRC
- o Names of plants or utilities with effective commitment tracking systems

This information will be provided as it becomes available.

IS THE INFORMATION PROVIDED TO THE PSC AND SRC ADEQUATE?

Overall, the information provided to the committees appears to be adequate. However, the PSC minutes often lack detail, and trends of important data are not provided to the committees.

RECOMMENDATION:

Continue efforts to improve the quality of PSC minutes to ensure adequate understanding by SRC reviewers.

- o Provide more comprehensive detail in the text.
- o Provide the necessary documentation to supplement the material in the text.

Expedite the efforts that were recently begun to review and trend Reports of Abnormal Conditions (RAC) and provide this information to the PSC and SRC when safety problems are indicated. Ensure that trends of events with similar causes, e.g., failure to follow procedures, are developed when RACs or Licensee Event Reports are reviewed.

HAS THE INFORMATION PROVIDED BEEN SUBJECTED TO ADEQUATE TECHNICAL REVIEW/QUALITY CHECKS BEFORE SUBMITTAL TO THE COMMITTEES? ARE THE COMMITTEES BEING PROPERLY UTILIZED, OR ARE THEY BEING DIVERTED FROM TRULY IMPORTANT SAFETY TASKS?

The information provided to the SRC is adequately reviewed prior to submittal to the SRC. Utilization of the SRC is satisfactory. The PSC has become a management committee as well as a safety committee. While this does not appear to have diverted the committee from important safety tasks, it has increased its workload. The review of material presented to the PSC is adequate.

RECOMMENDATION:

The type of material reviewed by the PSC should be evaluated to determine if committee review is necessary. Particular attention should be paid to separating management issues from PSC issues. Examples of items that should be considered for management, rather than PSC review, include the following:

- o INPO materials such as Significant Operating Experience Reports
- o Current PSC action items that are not directly related to safety
- o Plant Information Requests, Plant Engineering Action Requests, and Licensing Information Requests that are not directly related to safety
- o Selected NRC correspondence

Consideration should be given to dividing the PSC tracking system into separate systems to clearly separate management and committee issues.

Consider the use of "ballot" reviews on some of the items reviewed by the PSC to reduce the length or number of meetings and to allow individual committee members to more selectively utilize their time. Review the results of these "ballots" at PSC meetings. Examples of items that may be considered appropriate for this type of review include the following:

- o procedures, procedure revisions, and procedure deletions
- o plant transient reports
- o design change packages
- o completed PSC action items
- o RACs

The PSC membership should be reviewed to determine if appropriate individuals are included as members. Subcommittees could be used to reduce the workload on PSC members. Positions that should be considered for membership or subcommittee membership include the operations superintendents, electrical and instrument & control superintendents, and shift supervisors. Such action, in conjunction with the previous recommendation, could reduce the amount of time each individual spends on PSC business as well as improve the quality of some reviews.

ARE THE COMMITTEES REVIEWING INFORMATION FROM AN APPROPRIATE PERSPECTIVE TO EVALUATE OVERALL NUCLEAR SAFETY CONSIDERATIONS?

In general, the information is being reviewed from the proper perspective to evaluate overall nuclear safety.

RECOMMENDATION:

The SRC management audits appear to be thorough and in depth. These audits have been effective in identifying areas of plant operation that need improvement. Frequent follow-up on items that require action should be continued and status reported to the SRC.

Training for SRC members should be expanded to ensure that they are fully cognizant of their committee responsibilities. The training should ensure that each SRC member fully understands the following:

- o what type of material he is to review
- o why he is to review this material
- o the degree to which he is expected to review this material
- o how his special expertise should be applied to ensure a thorough review by the committee

ARE THE COMMITMENT CONTROL PROGRAM GOALS AND OBJECTIVES APPROPRIATE IN VIEW OF MANAGEMENT CONCERNS RELATIVE TO THE ADEQUACY OF AP&L'S REGULATORY RESPONSES AND COMMITMENTS?

In general, the goals and objectives listed in section 1.2 of the EDS Nuclear, Inc. (EDS) study are appropriate. They collectively represent elements needed to establish and conduct an effective regulatory response and commitment control program. However, it may be worthwhile to restate these goals and objectives, refined as necessary, to specifically indicate that they are AP&L goals and objectives rather than EDS recommendations.

DO THE ACTION PLANS DEVELOPED IN PHASE ONE ADEQUATELY ADDRESS THE PROGRAM GOALS AND OBJECTIVES?

At the present stage of development, the action plans do not adequately address the program goals and objectives. The action plans currently only address the resolution of

problems or symptoms relative to the previously existing regulatory response/commitment control methods. Additionally, these plans are only in the first draft stage and distributed for initial comments. AP&L intends to further refine these action plans including major action steps/milestones, resource requirements, schedules, identification of the interrelationship of various actions, and overall program logic.

RECOMMENDATION:

The following items should be considered in finalizing the action plans:

- Correlate the action plans more closely with the program goals and objectives. Tying the action plans more closely to the specific or related goals and objectives may provide improved long-range planning as well as provide a measure of the program's status of implementation. The previously noted problems and symptoms could be included with action plans as appropriate to the applicable goals and objectives.

- Address the existing action plans involving system engineer and PSC action tracking separately from the regulatory response and commitment control program since these action plans are only partially and indirectly related to this program.

- Within the action plans, identify those actions that are short term or interim as well as the longer-term action that AP&L intends to pursue.

- If the action plans involve the use of computer hardware or software, it is recommended that standard system development and life cycle methodologies be employed and possible future interfaces with plant or management information systems (yet to be developed) be considered. From interviews conducted during the assistance visit, it appears that Energy Supply has been experiencing some difficulties in obtaining computer-related support services in a timely manner.

- Interviews concerning Commitment Tracking (Section 3.1 of EDS study) reflect a constructive approach to defining the problem, scope, and possible need for passive commitment tracking. Significant ANO input is imperative for the success of such a tracking system. If both corporate and station passive commitment tracking systems are utilized, the scope and relationship between each system should be clearly defined, particularly for common items.

- In addressing Correspondence and Commitment Control (Section 3.2 of EDS study) all originating organizations should be surveyed, not just licensing.

- The identification of licensing points of contact is a significant addition over the EDS recommendation in Section 3.4 of the EDS study and should be documented as soon as possible.

- The IBM 5520 Licensing Document Library and Keyword Index (Section 3.5 of EDS study) should be made available to ANO Special Projects and Plant Engineering with appropriate training to facilitate safety reviews and commitment control. All documents that constitute the current commitment baseline should be incorporated.

- Responsibility/Accountability (Section 3.8 of EDS study) is assigned a "medium" priority in the EDS study. Determination of responsibility/accountability should be given the highest priority. Analagous to the systems engineer concept (Section 3.11 of EDS study), AP&L should consider designating individuals for "ownership" of key license-basis documents, or portions thereof, such as the FSAR. Such an individual would be responsible to ensure accuracy and clarity of the license-basis document.

- In the Quality of Documents (Section 3.10 of EDS study) area, current procedures should be reviewed to ensure that overall commitment control is adequately addressed. For example, Attachment 3 ("Design Evaluation Questions") to the ANO Design Control Procedure does not contain a question as to how previous regulatory commitments have been considered in the design. In addition, Form 1032.01B, "Controlled Design Documents for ANO," should be revised or supplemented as necessary to ensure that the reviewer considers all applicable documents that are part of the current commitment baseline.