



ARKANSAS POWER & LIGHT COMPANY
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000
April 2, 1982

ØCANØ482Ø2

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
50-313/82-02 and 50-368/82-02
(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,

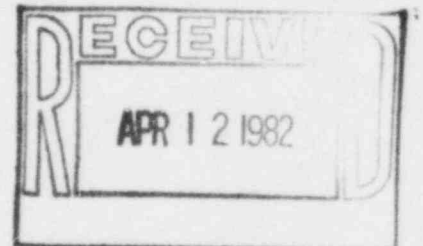
John R. Marshall
Manager, Licensing

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



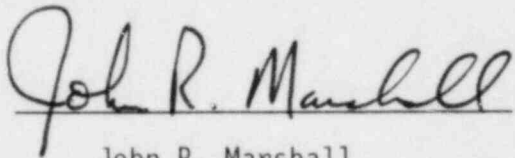
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MEMBER MIDDLE SOUTH UTILITIES SYSTEM

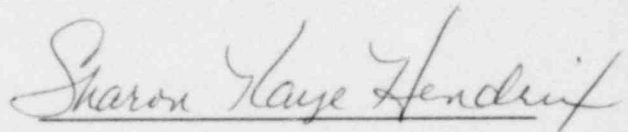
STATE OF ARKANSAS)
)
COUNTY OF PULASKI)

SS

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 ØCANØ482Ø2 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

SUBSCRIBED AND SWORN TO before me, a Notary Public in and for the County and State above named, this 2 day of April, 1982.


Notary Public

My Commission Expires:

9-19-89

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of February 1-5, 1982, and in accordance with the Interim Enforcement Policy 45 FR 66754 (October 7, 1980), the following violation was identified:

Surveillance Test Identification

10CFR50, Appendix B, Criterion V requires that "activities affecting quality shall be prescribed by documented instructions, procedures, ... of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures,..." Licensee Procedure 1000.09, Revision 3 (8/26/81), "Surveillance Test Program Control," requires, in paragraph 5.6, that Department Heads "review new, revised, and additional Technical Specifications and other licensing commitments for surveillance testing requirements, and ensure that the Surveillance Test Coordinator is informed through the use of Surveillance Test Program Revision Sheets."

Contrary to the above, on February 2, 1982, the Unit 2 surveillance test requirement delineated in paragraph 4.4.4.2(G) of the Technical Specifications, which was part of Amendment 20 to the Unit 2 Technical Specifications and had been issued March 3, 1981, was found not to have been transmitted by the Maintenance Manager to the Surveillance Test Coordinator.

This is a Severity Level V violation. (Supplement I.E.)
(50-368/8202-01)

RESPONSE:

On February 4, 1982, corrective action was taken to add the pressurizer proportional heater 18-month test to the surveillance test program by initiating Form 1000.09A, "Surveillance Test Program Revision Sheet." This test was subsequently added to the Master Test Control List and surveillance logs in the Planning and Scheduling Department on February 6, 1982.

It should be noted that the surveillance test requirement was issued on March 3, 1981, and the initial test was conducted on June 19, 1981.

The ANO General Manager has conducted meetings with Department Heads to discuss surveillance test control, emphasizing identification and performance of all required surveillances in a timely manner.

Because of the actions taken, along with existing administrative controls, AP&L concludes that full compliance has been achieved.

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted during the period of February 1-5, 1982, and in accordance with 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:

Surveillance Scheduling Review

Arkansas Power and Light Company, in a letter to the Commission, dated August 11, 1981, stated that a review of surveillance procedures and scheduling practices would be completed by September 5, 1981.

In deviation from the above, the review of surveillance scheduling records was not complete on February 4, 1982.

This is a deviation. (50-313/8202-01)

RESPONSE:

At the time of the inspection a review of the Technical Specifications had been completed by the Operations Assessment Group although their comments and concerns had not been fully resolved by the departments responsible for the specific tests and had not been fully incorporated into the surveillance test program.

Departments with items still outstanding as a result of the Operations Assessment Group review were consulted, and the items were resolved. Necessary changes have been incorporated into the Master Test Control List and surveillance logs.

The review with respect to the "not to exceed" limitation has been completed and departments have been notified of tests in their areas that are to be performed within the specified time without a +25% time allowance. This restriction has been noted in the Master Test Control List and surveillance test logs.

Full compliance was achieved on February 8, 1982.

AP&L is in the process of upgrading the systems used to track commitments made to the NRC to ensure their timely completion.