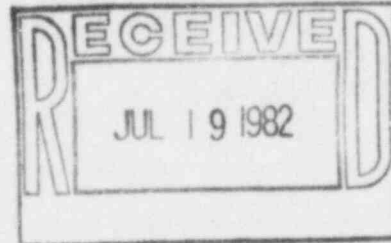




ARKANSAS POWER & LIGHT COMPANY

POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

July 14, 1982



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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  
Systematic Assessment of Licensee  
Performance (SALP) Board Report

Gentlemen:

Your letter of June 25, 1982, (ØCNAØ68213) transmitted the Systematic Assessment of Licensee Performance (SALP) Board Report for Arkansas Nuclear One - Units 1 and 2 for the rating period of July 1, 1980, to June 30, 1981, and requested comments to be submitted for inclusion in the final NRC SALP Report. The following comments are provided for your consideration and use.

AP&L endorses the SALP concept. We feel very strongly that objective performance evaluation is of substantial benefit to both the utility and the NRC and is effective in promoting a positive growth in safety performance. Furthermore, it enhances the utility's ability, as well as NRC's, to more effectively utilize resources and focus on the areas with the most safety significance.

Substantial progress has been made with the development of the SALP program and AP&L supports its continued enhancement. We feel the SALP program would be significantly improved in general by more closely involving the NRR Project Managers with the ongoing activities at the site. We suggest increasing the frequency of the NRR Project Managers site visits. We also feel that more timely processing of the SALP reports would significantly improve the program.

In general, AP&L concurs with the SALP Report findings, conclusions, and recommendations for Arkansas Nuclear One. There was, in fact, a mutual recognition of both strengths and weakness in the functional areas during the September 29, 1981, meeting at ANO where the SALP Board discussed its preliminary findings.

We used the preliminary findings as positive performance feedback and have aggressively pursued the development and implementation of improvement programs that address the report findings and recommendations. These programs encompass the areas identified as weaknesses as well as those identified as areas of strength.

Our programs in the areas of Operator Training, Employee Training, Drawing Control, Health Physics and Operations Staffing, Plant Equipment Problem Tracking, Preventative Maintenance, Security Task Force, and Commitment Tracking are good examples of our serious and continuing efforts to improve performance. In addition, the Special Projects Group at ANO is a significant contribution to unifying the Licensing efforts by the plant and the corporate Licensing Section. The corporate Licensing Section has been very successful in recruiting experienced engineers and will be fully staffed by the end of August for the first time since the Section was formed.

Furthermore, the aggressive efforts demonstrated in response to NUREG-0737, (e.g. the Emergency Feedwater System, Early Warning System, Emergency Response Center, Post Accident Sampling System, Gaseous Effluent Radiation Monitoring System, and the Safety Parameter Display System) as well as our prominent roles of leadership and support of Owners Group efforts further amplify AP&L's responsiveness and desire to go the "extra mile" in the resolution of issues.

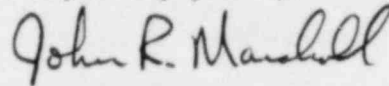
One inconsistency in the report was noted. On page 3 in Section III, Summary of Results, the functional area of Security and Safeguards was identified as Category 1. On page 15 in Section K.2, Conclusions, the function area of Safety and Safeguards was identified as Category 2. Our account of Mr. Hunnicutt's review of this area during the September 29, 1981, meeting at ANO was that this area was rated as Category 1.

AP&L has taken the initiative to use the SALP as a tool to assess and improve our performance and our interaction with NRC. We have worked diligently in the past to identify the issues of the highest safety significance and have lead the industry in many cases in the resolution of many issues. We are currently supplying industry leadership in several key areas such as design and installation of the Early Warning System, the Emergency Response Facilities, the Post Accident Sampling System, the Gaseous Effluent Radiation Monitoring System, Operator Training, and the Safety Parameter Display System. We will continue to aggressively attack safety issues and work with the NRC for efficient and timely resolution.

July 14, 1982

Reiterating an earlier point, more timely feedback is essential for the SALP evaluations to be meaningful and achieve the mutually desired results. Given the incorporation of the above comments we believe the SALP program will become a significant tool in shaping our future programs to achieve superior safety performance.

Very truly yours,

A handwritten signature in cursive script that reads "John R. Marshall".

John R. Marshall  
Manager, Licensing

JRM:s1