

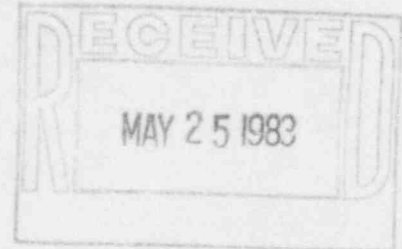


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May 17, 1983

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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, TX 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  
50-313/83-06 & 50-368/83-06

Gentlemen:

We have reviewed the subject inspection reports. Please find attached our response to the "Notice of Violation" included in the reports.

Very truly yours,

John R. Marshall  
Manager, Licensing

JRM:RJS:s1

Attachment

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

As a result of an NRC inspection conducted during the period March 1-31, 1983, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violation was identified:

### Radioactive Shipment Without Required Documentation

10 CFR Part 71.5(a), "Transportation of Licensed Material," requires that no licensed material shall be transported outside of the confines of the licensee's plant unless the requirements of the regulations appropriate to the mode of transportation of the Department of Transportation in 49 CFR Parts 170 through 189 are met. 49 CFR Parts 172.202(a)(1) and (3) state that shipping papers must include the proper shipping name and identification number prescribed for the material. 49 CFR Part 172.203(d)(1) lists additional description requirements that pertain to radioactive material, and 49 CFR Part 172.204 requires the shipper to certify the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation. This is further defined in your Arkansas Nuclear One Plant Procedure 1603.003, "Radioactive Material Shipments," Revision 6, which states in Section 6.9 that the appropriate forms, as required in Appendix A, shall be completed for radioactive material shipments. Appendix A requires forms which include the 49 CFR requirements listed above.

Contrary to the above, on March 13, 1983, a shipment of licensed material, consisting of two pressurizer code safety valves, was transported to Wyle Laboratories, Huntsville, Alabama, without the proper shipping name, identification number, radiological information, and the shipper certification.

This is a Severity Level IV violation. (Supplement V) (313/8306-01)

### RESPONSE:

Upon notification of the improper shipment by the receiver of the shipment, the shipper was notified of the shipment's contents and the approximate quantity of the various isotopes. The relatively low radiation levels and low contamination levels did not present a significant hazard to the public. In addition, an investigation into the various causes of the incident was conducted in connection with a nonconformance report (NCR #83-077-0) issued by AP&L following notification of the improper shipment by the receiver.

Corrective steps which will be taken to avoid further violation follow.

- A. In as much as existing Administrative and Health Physics procedures do not clearly and adequately define the process for shipping radioactive material other than radwaste, nor do they presently require involvement of the Radwaste Coordinator other than by implication,

these procedures will be revised to more clearly define the interface, responsibilities, and coordination required for radioactive shipments other than radwaste.

- B. The plant security guards had been instructed to ensure that radwaste shipments included papers prepared by the Radwaste Coordinator. However, since shipment loading took place outside the security fence by storeroom personnel; this check was bypassed. Additional instruction will be provided to security personnel to ensure that appropriate papers accompany any radioactive material leaving the security area.
- C. Contrary to normal practice, storeroom personnel rather than radwaste personnel assisted with the loading of the truck. Instructions will be provided to the storeroom personnel regarding the need to involve radwaste personnel when shipping radioactive material.
- D. Loss of control occurred initially at the equipment hatch where the valves were crated and surveyed by Health Physics (HP) personnel. HP personnel were unaware when the crates were moved and that the crates were moved to a location not identified as a designated storage area. A review of the control placed on radioactive material which is to be removed from the plants controlled access area will be conducted. More specifically, the evaluation will be aimed at ensuring that:
  - 1. positive control is maintained over those items which will be removed from the controlled access area but are not releasable as "clean",
  - 2. no material can leave the controlled access area unless it is checked by Health Physics, and
  - 3. material released as "clean" is turned over to the proper individual.
- E. The requirements for clearing material out of controlled access and for shipping radioactive material off site will be included in General Employee Training.

It is felt that the reorganization of the HP area to include responsibility for decontamination, radwaste handling, packaging, and shipping will provide for better control and coordination in this area. This reorganization was discussed in our response to the 1982 SALP report.

Corrective actions as discussed in Parts A, B, C, D and E are expected to be completed by September 1, 1983. The reorganization of the HP area to include the radwaste function is expected to be complete, including staffing, by January 1, 1984. At this time, full compliance will be achieved.

### NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period March 1-31, 1983, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violation was identified:

#### Vital Area Security Door Not Locked

10 CFR 73.55(d)(7) states, in part,

"The licensee shall positively control all points of personnel and vehicle access into vital areas.  
...Unoccupied vital areas shall be locked and protected by an active intrusion alarm system."

Table 6.1-1 to the Arkansas Nuclear One (ANO) Industrial Security Plan, which is implemented in accordance with ANO-1 Operating License DPR-51, provides a partial listing of vital areas. Item 5 in Table 6.1-1 is a vital area with access through security door 169.

Contrary to the above, at approximately 1500 hours on March 28, 1983, the NRC Inspector observed that the vital area behind security door 169 was unoccupied, and door 169 was propped open by an electrical extension cord running through it. No other means of positive access control was in effect.

This is a Severity Level IV violation. (Supplement III) (313/8306-02)

#### RESPONSE:

After notification of Item 313/8306-02, the following actions have been taken. A memorandum to ANO and contract personnel dated April 8, 1983, was issued by the Plant Manager describing the violation. This memorandum states the responsibilities of individuals when it is necessary to leave a security door open along with the necessary actions to prevent a similar violation. In the future, when security is notified that a security door must be left in an open position, the security officer will read door watch duties to the individual in charge of the door watch. Security personnel will also document that the door watch duties have been read to the individual.

Full compliance was achieved upon distribution of the April 8, 1983 memorandum mentioned above and upon implementation of the policy requiring security to brief door watch personnel on April 12, 1983.