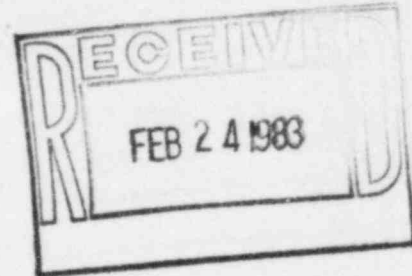




ARKANSAS POWER & LIGHT COMPANY

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February 17, 1983



ØCANØ28314

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
50-313/82-33 and 50-368/82-33

Gentlemen:

We have reviewed the Items of Noncompliance included in the subject reports. Attached are our responses to the two "Notice of Violation" items. Also attached is the requested response to the unresolved item noted in your cover letter.

Very truly yours,

John R. Marshall
Manager, Licensing

JRM:MCS:s1

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

Based on the results of an NRC inspection conducted during the period of November 15-19, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violations were identified:

1. Failure of the Plant Review Committee to Investigate a Licensee Identified Technical Specification Violation - Units 1 and 2

Technical Specification 6.5.1.6.e requires the Plant Safety Committee (PSC) to investigate all Technical Specification violations and provide a written report of such investigation.

Contrary to the above, it was found on November 17, 1982, that the PSC had not reviewed a Technical Specification violation identified in licensee nonconformance report (NCR) 81-007-0. The NCR reported failure to comply with ANSI N18.1-1971 when a new maintenance manager was appointed. Compliance with ANSI N18.1, 1971, is invoked in Technical Specification 6.3.1.

This is a Severity Level V Violation. (Supplement I.D.) (313/8233-01; 368/8233-01)

Response

The specific NCR (81-007-0) was written to document the fact that the individual appointed to the Maintenance Manager position did not satisfy the requirement of one year of Nuclear Power Plant experience. The individual did have extensive experience in power station operation and management. In addition, he had completed training related to Systems and Administrative procedures. His immediate subordinates did have Nuclear Plant experience in excess of one year. This disposition was accepted by the ANO General Manager. The individual has since acquired in excess of one year of Nuclear Plant experience.

However, the nonconformance was not reviewed by the Plant Safety Committee. The apparent cause is that the procedure which specifies the handling of NCR's is not specifically geared to identifying Technical Specification infractions to the Plant Safety Committee. The emphasis has been on items that are reportable under T.S. 6.9.1.8 and 6.9.1.9 (LER's), rather than the broader context.

The NCR procedure is in the process of being revised to be more effective. The aspects of identifying Technical Specification infractions to the Plant Safety Committee is being addressed.

In the interim, the Plant Safety Committee will document a weekly review of newly initiated NCR's for the purposes of assessing Technical Specification compliance.

2. Failure to Maintain Penetration Fire Barriers Functional - Unit 2

Unit 2 Technical Specifications, paragraph 3.7.11, requires that, "All penetration fire barriers protecting safety related areas shall be functional...at all times."

Contrary to the above, a cable conduit penetration through a 3-hour rated fire wall above fire door 268 in fire zone 2109U was found unsealed.

This is a Severity Level IV Violation. (Supplement I.D.) (368/8233-02)

Response

As stated in your inspection report, a fire watch was promptly posted. The penetration was subsequently sealed on 11/20/82. Corrective steps that are being taken to avoid further noncompliance include the following:

- A. Procedures used for periodic fire barrier inspection (i.e. 1405.16 and 2405.16, "Electrical Penetration Fire Barriers") are being revised to provide more in-depth acceptance criteria which includes electrical conduit penetrations.
- B. An independent (i.e. external to ANO plant staff) walkdown of Unit 2 and Unit 1 fire barriers is being conducted.

Full compliance will be achieved upon completion of items A and B above which is expected by 4/15/83.

UNRESOLVED ITEM 368/8233-03

As stated in your Inspection Report, the suppression system installed in zone 2136I remains an open item pending NRC review of our request for exemption as stated in our letter to the NRC dated November 11, 1982 (ØCAN11821Ø). Although not operational in the automatic mode, the system can be operated manually. Smoke detectors which alarm in the control room will warn of a fire in this area. As explained, the reason this system is not automatic is because the drains currently provided for this area do not have sufficient capacity for continued, unsupervised operation of the suppression system. Engineering efforts to increase the drainage capacity have been suspended until the NRC rules on the exemption request.