



**Entergy
Operations**

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September 20, 1994

OCAN099406

U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Update On Commitments

Gentlemen:

The need to continue compliance with certain commitments has been superseded by modified NRC regulations or alternate Arkansas Nuclear One (ANO) controls. Entergy Operations, Inc. (EOI) is providing an update on the progress of reviewing NRC commitments at ANO. During this effort, certain commitments have been identified for which ANO's docketed position should be clarified or changed. Enclosed is a summary of four such items resolved since the last update.

Guidelines are in place to assure that changes to identified commitments are considered for any safety significant implications. The commitment changes identified in this report were reviewed against the guidelines and were not considered to have any safety significant implications. No action is being requested from the NRC on any items from this report.

Should you have any questions, please contact me at (501) 858-4601.

Very truly yours,

Dwight C. Mims
Director, Licensing

DCM/dhw

Attachment

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U. S. NRC
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Commitment to Place Procurement Restrictions on Cardinal Industrial Products

In ANO's August 24, 1984 response (OCAN088415) to violation 313,368/8335-01, failure to assure conformance to procurement requirements, restrictions were placed on Cardinal Industrial Products Company. The effect of placing such restrictions on Cardinal was to assure that future procurements include additional quality controls such as increased source inspections or surveillance to assure that future deficiencies do not occur. In addition, Quality Assurance (QA) must approve each order placed with Cardinal.

This restriction has been captured in our commitment tracking system. ANO is eliminating the requirement to implement this restriction. The basis is as follows:

In the years since this commitment was imposed (10 years) Cardinal substantially improved its QA programs and remains an ASME certificate holder. Since that time Cardinal has had a history of satisfactory audits performed by EOI Supplier QA. In addition, they are subjected to periodic Nuclear Utilities Procurement Issues Committee (NUPIC) audits and review by EOI Supplier QA. The latest audit by NUPIC was in April 1994. It was noted that Cardinal demonstrated adequate implementation of their QA Program.

We believe that documentation is sufficient to support the release of restrictions on Cardinal and additional surveillance activities are no longer necessary.

Commitment to Tag Voltmeters to Require Operations Supervisor Approval Prior to Removal From Service

On March 9, 1976, a Unit 1 abnormal Occurrence Report No. 50-313/76-02 (ICAN037611) reported an occurrence concerning the failure to record daily pilot cell voltage readings for the station batteries as required by Technical Specification 4.6.2.1 due to voltmeters being removed for calibration. A commitment (P-12296) was made that voltmeters will be tagged requiring Operations Supervisor approval prior to removal from service.

ANO is eliminating this requirement based on the following:

When this commitment was made in 1976, the voltage readings for the station batteries pilot cells were recorded by the operations department using the meters installed on the equipment. At the time of the event, operators took their voltage readings directly off installed meters but could not take the required readings since the voltmeters were removed for calibration. The installed meters are no longer used for this function and are only used as a reference. The reading of the pilot cell is currently performed under the surveillance program in accordance with procedure 1307.016, "Switch Yard Station Battery Pilot Cell Test". The readings are now performed using calibrated test equipment (digital multi-meters) with voltage readings taken directly from the pilot cells. Procedures still require that the Operations Shift Supervisor be notified that work is ready to start and that his authorization has been given.

Commitment to Have Dedicated Equipment to Measure Radiiodine During an Accident

An evaluation was performed (OCNA038209) by the NRC during March of 1980, indicating Units 1 and 2 were satisfying all Category "A" items of the NRC recommendations resulting from TMI-2 Lessons Learned. From that evaluation commitment actions were issued to provide equipment which can be dedicated to analyzing air samples for radioiodine concentrations during an accident. The evaluation write up was as follows:

The licensee has equipment which can be dedicated to analyzing air samples for radioiodine concentrations during an accident. The licensee states that sample collection and counting times can be minimized, in an accident situation, so that a rapid analysis can be made to determine if significant inplant airborne radioiodine concentrations are present. The licensee has also ordered two single channel analyzers which can be used to promptly and accurately analyze air samples for airborne radioiodine during an accident. These analyzers will be located onsite: one in the ANO-1/ANO-2 control room area and one in the Technical Support Center (TSC) where plant personnel will be stationed during an accident.

These instruments, SAM-2/RD-22, are used for determining the concentration of airborne radioiodine in the TSC or Control Rooms.

These instruments are not used on a routine basis by Radiation Protection (RP) personnel; therefore, special training must be provided to members of the Emergency Radiation Team (ERT) concerning the operation of this equipment. In addition, approximately two hours are required to make each instrument ready for counting air samples. If either or both of these fail, there are no additional units available on site.

Instead of using the SAM-2/RD-22, ERT members will be using other instruments to analyze for radioiodine. The instruments will be standard instruments used throughout the plant. Procedures are in place and currently being used for iodine monitoring using these instruments. If the initial air sample analysis indicates the presence of radioiodine, then the air samples would be taken to the Nuclear Chemistry Laboratory and analyzed on a multichannel analyzer. If, due to emergency conditions, the Nuclear Chemistry Laboratory was inaccessible, the samples would be taken to the Emergency Operations Facility for counting.

The Emergency Planning staff has reviewed the proposed change to procedure 1903.060, "Emergency Supplies and Equipment", that would change the listed equipment. This review included an evaluation of the change in accordance with the requirements of 10CFR50.54(q). Emergency Planning has determined that the change does not decrease the effectiveness of the Emergency Plan and the plan continues to meet the standards of 10CFR50.47(b) and the requirements of 10CFR50, Appendix E.

ANO is still meeting the obligation to be able to accurately measure radioiodine but is removing the commitment that this obligation be met with the single channel analyzers or any specific piece of equipment. The justification for the removal of this commitment does not introduce any new commitments on the part of ANO.

Commitment to Have QC Inspect the Bypass and Jumper Log Every Four Months

An NRC inspection (313/7413-01) was conducted during October 1-4, 1974. Among the findings was an instance of the bypass and jumper log not being maintained per the requirements of procedure 1005.004, "Control and Use of Bypasses and Jumpers". No equipment problems were noted; however, problems were found with missing information or incorrect page numbering. Letter 1CNA117406, dated November 5, 1974, documented the NRC findings and stated that the log had been corrected and that the Licensee's Quality Control (QC) personnel would perform an audit in approximately 2 weeks. Letter 1CAN127406 committed (A-12988) ANO to a QC inspection every 4 months to assure compliance to procedures. This commitment was implemented by Revision 3 of procedure 1004.008, "QC Inspections".

At the time of the NRC finding, Revision 2 of procedure 1005.004, contained no provisions for review of the log for completeness and correctness. TC-1 of Revision 2 added the following:

The Shift Supervisor is responsible for assuring that the log is reviewed on a monthly basis for completed sheets. These completed sheets are to be forwarded to the Administrative Assistant for filing.

This change provided a monthly review of the log which addressed the concern raised by the NRC finding.

During the 1980 procedure revision and development program, procedure 1005.004 was superseded by procedure 1000.028, Revision 0. The title of procedure 1000.028, Revision 6, was "Jumper and Lifted Lead Control". The title was changed to "Temporary Modification Control" with Revision 7. The current Temporary Modifications Control procedure, 1000.028, Revision 17, has stringent controls and reviews for temporary modifications. The procedure currently assigns responsibility to the Operations Managers for ensuring that a review of all temporary modifications installed for his unit is performed. The Shift Superintendent is responsible for maintaining temporary modifications logbook and packages for his respective unit during his assigned shift. The instructions of the procedure contain a section for the temporary modification review and states that the Operations Manager shall designate an individual to perform a review of each temporary modification on his unit for compliance with the procedure. One step in the supplement that guides the review has the individual to verify that all temporary modification log index sheets are filled out properly. Consequently, the current procedure addresses the concerns of the 1974 NRC finding on a monthly basis.

Attachment to
OCAN099406

Due to the increased emphasis on temporary modifications and the review by Operations which includes review of the log sheets, it is felt that the original concern of the NRC is addressed and the commitment for the QC surveillance of the logbook every 4 months is unnecessary.