



ARKANSAS POWER & LIGHT COMPANY

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

April 6, 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  
50-313/82-36 and 50-368/82-37

Gentlemen:

We have reviewed the Items of Nonconformance included in the subject report. Attached is our response to the "Notice of Violation" items.

Very truly yours,

John R. Marshall  
Manager, Licensing

JRM:RJS: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

As a result of an NRC inspection conducted during the period December 13-16, 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:

### A. Procedural Compliance

Both Unit 1 (50-313) Technical Specification 6.10 and Unit 2 (50-368) Technical Specification 6.11, "Radiation Protection Program," require that: "Procedures for personnel radiation protection shall be prepared...and adhered to for all operations involving...exposure."

Additionally, ANO General Radiation Worker Procedure 1622.015, "Bioassay Sampling Program," paragraph 6.2.4 requires: "...bioassay shall be performed whenever there is...an internal exposure in excess of 2 MPC-hours in any day."

Contrary to the above, an ANO employee was documented on ANO Form 1609.010A, "Calculation of MPC Hours and Stop Times," as exceeding 2 maximum permissible concentration (MPC) hours in 1 day (August 8, 1982), and as of December 16, 1982 (date of finding), the employee had not obtained the required whole body count (bioassay).

This is a Severity Level V violation (Supplement IV).

### RESPONSE

Subsequent to notification of the previous violation, the individual who exceeded 2 maximum permissible concentration (MPC) hours in one day received a whole body count on December 16, 1982, which indicated 0% maximum permissible body burden (MPBB).

As a corrective step, ANO Form 1609.010A was revised October 22, 1982, to require a Health Physics Supervisor's review signature. This is a measure to ensure that individuals who exceed 2 MPC hours in one day or 10 MPC hours in seven days receive a whole body count in accordance with ANO Procedure 1622.015.

Accordingly, full compliance was achieved December 16, 1982.

### B. Final Safety Analysis Update

10 CFR Part 50.71(e) requires that: "Each person licensed to operate a nuclear powered reactor...shall update periodically...the final safety analysis report (FSAR) originally submitted...to assure that the information included in the FSAR contains the latest material developed."

Contrary to the above, the NRC inspectors determined on December 14, 1982, that the July 15, 1982, update of the FSAR for ANO Unit 1 showed that radiation zones at certain areas in the containment building were

less than 100 mRem/hr. However, actual survey data for these areas indicated that radiation levels exceeded 100 mRem/hr.

This is a Severity Level V violation (Supplement IV).

#### RESPONSE

This violation states a disagreement exists between the actual survey data and the radiation zone designations contained in the latest FSAR update. The violation is specifically against 10 CFR Part 50.71(e) which requires the FSAR to be periodically updated to ensure it is up-to-date as of a maximum of six months prior to the date of filing.

As required by 10 CFR Part 50.71(e), on July 22, 1982, we submitted our updated version of the ANO Unit 1 and Unit 2 FSARs with the belief that the document was in full compliance. It was also our belief that we had actually gone "the extra mile" by having set for ourselves a goal to make those documents a useful Engineering and Operations tool as well as a "living" document. It was strictly an oversight on our part that the subject drawing discrepancies were not corrected.

Significant effort has been made (and is continuing to be made) to ensure the FSAR is "up-to-date." The FSAR Update program at AP&L is among the more significant activities which we have ongoing. The original budget for this item alone was approximately \$2 million, and the total manpower expended for the initial updated version required in excess of 40,000 manhours. Over 100,000 pages of documentation/correspondence were reviewed for applicability to that update. Although the annual update requirements are not as impressive it is nevertheless a major undertaking and requires a staff of from 2-4 to track changes to the over 250 drawings contained in the FSAR and to review the several hundred pieces of correspondence/documents generated each year.

The accuracy of the FSAR is of significant concern to us, and the statistics listed above clearly demonstrate our dedication to producing an exemplary document. However, we also recognize that regardless of the determination of our efforts, the sheer volume of material to be maintained dictates a certain probability that oversights may occur. Should this happen (as in this case), we feel that notification to us in the form of a Notice of Violation would be unduly harsh. We believe that some other means of notification could be made which would give us the opportunity to correct any oversight without the need for such stern regulatory action.

Furthermore, it is significant to note that identification of a plant/FSAR discrepancy is not (in itself) sufficient justification for initiating an FSAR change. The primary importance at this stage is to ensure that all changes (or potential changes) are properly evaluated with regard to plant safety in accordance with the provisions of 10CFR50.59. This may result in an FSAR change, or may instead require some other action be taken. Consideration must also be given to the fact that since some evaluations require longer to complete, it may be

necessary to "hold" them for submittal with a future revision. This, we believe, is consistent with paragraph (e)(2) of 10CFR50.71 which addresses the requirement to properly analyze each potential change.

As concerns the radiation zone maps in question, they are currently being revised to reflect actual plant conditions and will be incorporated into the 1983 annual submittal of the FSAR. With this change made, we will be in compliance with our submittal of July 22, 1983.

Also, FSAR Update procedures are currently being revised to reflect the experience AP&L has gained during this annual update effort. These procedures, which will contain specific guidance for handling applicable update information, will increase our effectiveness in maintaining an "up-to-date" FSAR.