



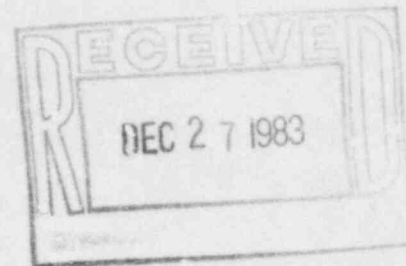
ARKANSAS POWER & LIGHT COMPANY

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

December 15, 1983

0CAN128312

Mr. J. E. Gagliardo, Director
Division of Resident Reactor Projects
and Engineering Programs
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
50-313/83-25 and 50-368/83-25

Gentlemen:

We have reviewed the subject inspection reports. Please find attached our responses to the "Notice of Violation" included in the report. This response includes items A, C, D and E of the subject report. Due to activities associated with the current ANO-2 outage and the intervening holidays, our response to item B is not yet complete. The response to the remaining item will be forwarded by January 15, 1983.

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

8401170264 840110
PDR ADOCK 05000313
Q PDR

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of September 1-30, 1983, 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. Failure to Document Equipment Operability in the Station Log - Unit 2

Unit 2 Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering... a. The applicable procedures recommended in Appendix 'A' Regulatory Guide 1.33, Revision 2, February 1978."

Operations Administrative Procedure 1015.01, Revision 11, "Conduct of Operation," has been established in accordance with this Technical Specification.

Section 9.2.1 of Procedure 1015.01 requires that upon discovery of inoperable components or prior to initiating maintenance on components required by Technical Specification Limiting Conditions for Operation (LCO), the redundant counterparts for the affected components must be verified operable. The results of this operability verification are then required to be entered in the Unit 2 Station Log.

Contrary to the above, on March 12, 1983, the licensee performed maintenance on the 'A' train sodium hydroxide tank outlet valve, 2CV-5657-1, without documenting in the Unit 2 Station Log the verification of the operable status of the 'B' train sodium hydroxide tank outlet valve, 2CV-5667-2.

Response:

A discussion of Item A, "Failure to Document Equipment Operability in the Station Log," was held with both units' Shift Supervisors and SAA's during the Shift Supervisors Meeting of November 3, 1983. Also, a memorandum to all Operations personnel has been issued to provide additional clarification of the documentation requirements and to reinforce the requirements to provide such documentation. Additional "prompting" or "triggering" mechanisms will be added to procedures controlling and approving work on such safety-related components and procedures governing the reporting of abnormal conditions of such safety-related equipment. Such procedural "prompting" should substantially lessen probability of recurrence since substantially less reliance will be placed on operator memory and cognizance. We are currently in compliance.

C. Fire Watch Stationed Without a Fire Extinguisher - Unit 2

Unit 2 Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented and maintained covering... f. Fire Protection Program implementation."

Safety and Fire Prevention Administrative Procedure 1053.02, "Control of Ignition Sources," has been established in accordance with this Technical Specification.

Step 5.5.1 of Procedure 1053.02 requires that if a fire watch is specified for a welding activity by the Ignition Source Permit (Form 1053.02), then that fire watch shall have fire extinguishing equipment readily available when stationed.

Contrary to the above, on September 13, 1983, the NRC inspector observed a fire watch stationed without fire extinguishing equipment readily available. The fire watch was required by the Ignition Source Permit for the welding activity associated with Job Order 47370, which was in progress in the 2T21 tank room (Fire Zone 2032) on the 335' elevation of the Unit 2 auxiliary building.

This is a Severity Level IV Violation. (Supplement I) (50-368/8325-03)

Response:

✓ For Item C, "Fire Watch Stationed Without A Fire Extinguisher," corrective steps were to revise the training program to train appropriate employees and retain these employees on a quarterly basis. Fire extinguishers are now required to be checked out at the start of each shift and returned at the end of the shift as a corrective measure to avoid further violation. Full compliance was achieved November 30, 1983 with the completion of the retraining of appropriate personnel.

D. Failure to Segregate Q Material From Non-Q Material - Units 1 and 2

10 CFR 50, Appendix 'B', Criterion XIII requires that, "Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions...."

Material Management Administrative Procedure 1033.02, Rev. 7, "Control of Material," has been established in accordance with Criterion XIII.

Step 6.2.1 of Procedure 1033.02 requires that, "Q, C or F materials which have passed receipt inspection shall be stored in a segregated area apart from non-Q material."

Contrary to the above, on September 14, 1983, a number of pallets bearing non-Q material were observed by the NRC inspector stored with Q material in an area which was marked off and designated as a Q material storage area.

This is a Severity Level V Violation. (Supplement I) (50-313/8325-01) (50-368/8325-04)

Response:

In response to Item D, "Failure to Segregate Q Material from Non-Q Material," the following corrective steps were taken. The pallets

bearing non-Q material observed by the NRC inspector stored with Q material on September 14, 1983, were moved to a non-Q storage area on September 14, 1983. ANO storekeepers made a walkdown of all Q storage areas on October 25, 1983, to verify segregation and/or flagging of all Q materials. The ANO Stores' Supervisor made a walkdown of the same areas on October 25, 1983, and documented the results. To avoid further violation, training was given to storekeepers on November 18, 1983, as to the requirement to maintain segregation of Q,C,F materials from non-Q materials. In addition, a review of Q storage areas to verify segregation and/or flagging of Q materials will be performed during the monthly storeroom inspections. Full compliance with this procedural requirement on segregation of Q materials was achieved on November 18, 1983.

E. Failure to Operate and Maintain the Vibration and Loose Parts Monitor (V&LPM) in Accordance With Procedures - Unit 2

10 CFR 50, Appendix 'B', Criterion V requires that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Instrument and Control System Procedure 2105.02, Rev. 0, "Vibration and Loose Parts Monitor System," has been established in accordance with Criterion V.

Step 6.2.2 of Procedure 2105.02 requires that, "Once per month, the instrumentation and control department shall record Channels 1 through 4 on tape and X-Y plots per Appendix II."

Step 7.0 of Procedure 2105.02 requires that specific actions be taken in the event of an alarm on the V&LPM panel, including logging the alarmed channel on Appendix II of the procedure.

Contrary to the above, on September 21, 1983, the NRC inspector determined from discussions with operations personnel that the alarms existing on the V&LPM had not been logged in Appendix III of Procedure 2105.02, and that none of the other actions had been taken that were required by Step 7.0 in the event of an alarm.

The NRC inspector also determined from discussions with instrumentation and control personnel that the required monthly recording of Channels 1 through 4 and X-Y plots on the V&LPM were not being done.

This is a Severity Level IV Violation. (Supplement I) (50-368/8325-05)

Response:

In reply to Item E, "Failure to Operate and Maintain the Vibration and Loose Parts Monitor (V&LPM) in Accordance With Procedures," the following corrective steps taken were: 1) To provide Appendix III forms in work locations near the V&LPM, and 2) to notify operators of

the need to check and log all alarms. Corrective steps to be taken to avoid further failures are as follows:

- a) Issue Job Orders to I&C and Plant Performance to make the unit operational;
- b) Require all operators to review OP 2105.02 and comply with 6.1.2, 6.2.1, and 7.0;
- c) SAI is being contracted by Plant Performance to come onsite, train people, and recommend surveillance to be performed; and,
- d) Plant Performance will set up surveillance schedules and implement procedures to perform the required surveillances.

Full compliance will be achieved by June 30, 1984.