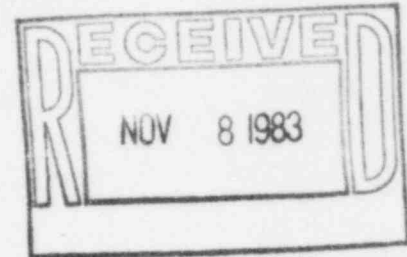




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October 31, 1983

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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
50-313/83-21 and 50-368/83-21

Gentlemen:

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

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

Based on the results of an NRC inspection conducted during the period of August 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 violations were identified:

A. Inadequate Procedure Used for Determining Containment Atmosphere - 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' of Regulatory Guide 1.33...."

Plant Operating Procedure 2104.33, Revision 7, "Containment Atmosphere Control," has been established in accordance with this Technical Specification.

Contrary to the above, Procedure 2104.33 was inadequately maintained, in that it provided incorrect information that prevented the control room operators from correctly determining the relative humidity inside the Unit 2 containment building (the accurate determination of containment building relative humidity is needed to ensure compliance with Unit 2 Technical Specification 3.6.1.4, "Containment System Internal Pressure, Air Temperature and Relative Humidity"). Specifically, Attachment A to Procedure 2104.33, which provides a psychrometric chart to determine relative humidity, incorrectly states:

"Dewpoint is defined as Wet-Bulb temperature; the terms are interchangeable."

In addition, Step 2.7.2 to Procedure 2104.33 incorrectly states:

"This Dewpoint (Wet Bulb) Temperature may be used with the Containment Temperature (Dry Bulb) to determine the Relative Humidity of the Containment Building."

This is a Severity Level V Violation. (Supplement I)(50-368/8321-01)

RESPONSE:

Review of Item 50-368/8321-01, Inadequate Procedure Used for Determining Containment Atmosphere, indicated procedural revisions were required. Operating Procedure 2104.33 has been revised to provide for accurate relative humidity assessment. Upon approval of the subject procedure on August 1, 1983, we are now in full compliance. It should be noted that the original procedure was conservative with respect to the Technical Specification in that it indicated a lower relative humidity compared with the corrected procedure.

B. Licensed Plant Operators Not Trained on a Facility Design Change - Unit 2

10 CFR Part 55, Appendix 'A', "Requalification Programs For Licensed Operators of Production and Utilization Facilities," states, in part:

- "3. On-the-job training. The requalification program shall include on-the-job training so that ...c. Each licensed operator and senior operator is cognizant of facility design changes, procedure changes, and facility license changes...."

Design Change Packages (DCP) 83-2154 was implemented by the licensee during the period August 13-14, 1983. DCP 83-2154 modifies the Unit 2 facility by providing flood protection for one train (green) of vital 125VDC power in the event of an actuation of the fire suppression system in Corridor 2104 on the 372' elevation of the Unit 2 auxiliary building. The implementation of DCP 83-2154 was a prerequisite for reactivating the Corridor 2104 fire suppression system, which had been previously isolated when a potential for the simultaneous loss of all vital 125VDC power due to flooding from the suppression system was identified.

Contrary to the above, although the fire suppression system in Corridor 2104 was reactivated on August 15, 1983, the Unit 2 licensed operators had received no training relative to DCP 83-2154 by August 19, 1983.

This is a Severity Level IV Violation. (Supplement I)(50-368/8321-02)

RESPONSE:

Subsequent to review of Item 50-368/8321-02, Licensed Plant Operators Not Trained on a Facility Design Change, several corrective steps have been taken. Training material relating DCP 83-2154 and the flooding problem and procedures affected were made available. A review of this material by Unit 2 operators has been documented making us currently in compliance.

In order to prevent recurrence, guidelines will be incorporated into existing procedures governing station modifications to provide criteria for determining if training is required before modified system restoration or if it may be safely delayed until covered through other training mechanisms, such as "read-and-sign" training packages or requalification classroom lecture presentations. These guidelines should be incorporated into procedures by December 15, 1983.

C. Failure to Follow Procedures for a Calculation and Design Change Related to Q-List Components - Unit 2

10 CFR Part 50, Appendix 'B', Criterion V, requires that activities affecting quality be prescribed by documented procedures and be accomplished in accordance with these procedures.

The following examples of failure to follow procedures controlling activities affecting quality (design changes related to Q-list components) were identified:

1. Little Rock General Office Engineering Procedure GCP-203, "Document Preparation, Change and Review," Section 4.1.4, requires that for all calculations related to Q-list system, structure or component, an independent review shall be performed to verify the completeness and accuracy of the calculation.

Contrary to the above, Little Rock General Office Engineering Calculation 83D-2057-03, titled "Corridor 2104 Flooding Chronology," is related to a Q-list component but did not receive the required independent review. Calculation 83D-2057-03 was used by the licensee as a basis for Design Change Package (DCP) 83-2154, which provided flood protection for vital D.C. Control Center 2D02, a Q-list component. This calculation was also used as the basis for the licensee's safety analysis concerning the consequences of an actuation of the fire suppression system in Corridor 2104 on a variety of other Q-list (safety-related) components.

2. Paragraph 6.1.2 of Plant Engineering Procedure 1032.01, "Design Control," states that during the initiation of a plant engineering design activity,

"...the lead engineer shall determine whether the work is Q, F or non-Q, and whether it requires the participation other than his own or of other ANO departments. Work shall be considered "Q" if it is for a system, structure or component on the Q-list."

Contrary to the above, an ANO-2 design change involving a Q-list component was incorrectly considered to be non-Q. The design change, identified as Design Change Package (DCP) 83-2154, was installed during the period August 13-14, 1983, to provide flooding protection for vital D.C. Control Center 2D02 in the event of an actuation of the fire suppression system in Corridor 2104. The licensee had determined that this design change was essential to avoid placing the plant in an unanalyzed safety condition due to the potential loss of both vital D.C. electrical buses during prolonged operation of the fire suppression system in Corridor 2104.

This is a Severity Level IV Violation. (Supplement I)(50-368/8321-03)

RESPONSE:

The calculation referenced in Part 1 developed a time history versus water level in Corridor 2104. It only served to document the theoretical chronology of a deluge system actuation. Since the calculation was addressing water level only (not the effect of the water) it was declared to be a Non-Q calculation. In retrospect, based on the Design Basis for Fire Protection Systems (reference FSAR

9.5.1.1.c) the calculation should have been F-Listed and received the required independent review (reference Procedure 1032.03, Step 6.2.2).

In order to correct this item the calculation is being revised by Energy Supply (E.S.) Engineering as F and will receive the required independent review by November 14, 1983. To prevent recurrence, a memorandum will be sent to the responsible E.S. Engineer, E.S. Engineering Managers, and Plant Engineers to call to their attention the requirement for independent review of F-system calculations and design change packages (DCPs) to prevent recurrence. This memorandum was completed October 25, 1983.

With regard for Part 2 of the subject inspection report item, the DCP will be re-reviewed and declared F, and documented by a field change notice (FCN). The corrective action to prevent recurrence described in response to Part 1 also applies to this item. The FCN will be reviewed/approved October 31, 1983.

D. Maintenance Performed on Safety-Related Equipment Without a Procedure - 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 of Regulatory Guide 1.33...."

Paragraph 9.2 of Regulatory Guide 1.33, Appendix A, states that maintenance which can effect the performance of safety-related equipment should be properly performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.

Contrary to the above, maintenance was performed on safety-related station battery 2D12 without written procedures. The maintenance performed consisted of the removal of electrolyte from various battery cells on June 17, 1983, and again on July 15, 1983.

This is a Severity Level V Violation. (Supplement I)(50-368/8321-04)

RESPONSE:

In response to Inspection Report Item 50-368/8321-04, Maintenance Performed on Safety-Related Equipment Without a Procedure, the June 17, 1983 incident involved Operations personnel performing Daily Surveillance Procedure 2107.01. This surveillance covers Pilot Cell Voltage and Specific Gravity measurements. When the electrolyte level was noted to be high, the excess was removed using the same technique used to extract a sample for Specific Gravity readings.

The July 15, 1983 incident occurred in a similar manner except that Operations wrote a job order for Maintenance to correct the problem. The method used to extract excess electrolyte was the same in both incidents.

The inspector has cited Regulatory Guide 1.33, Appendix A, Paragraph 9 as the requirement violated. The requirement in effect says that Maintenance that can affect performance of safety-related equipment should be covered by written procedures. It further states that tasks within the skills level of personnel performing said tasks "may not require" a detailed procedure. The inspector also noted in the Exit Meeting that water addition to batteries is covered by procedure.

The removal of electrolyte to the high level mark does not affect the performance of the battery. Adding water does affect performance as this changes the Specific Gravity of the battery. This task is performed routinely by both Operations and Maintenance personnel assigned to do so.

Based on the above criteria, we do not believe a violation has occurred. However, in order to track both the amount of water added and the amount of electrolyte removed from these battery cells, we will establish an accounting mechanism for these functions. This action will be completed by November 30, 1983.

E. Electrical Cable Installation Not in Accordance With Design Drawing - Unit 2

Criterion V of 10 CFR Part 50, Appendix 'B', requires that activities affecting quality be accomplished in accordance with instructions, procedures, or drawings.

Electrical Drawing E-2059, "Conduit and Cable Tray Notes," Section II.1, states that all power, control, and instrumentation wires shall be installed in conduit, wireways, or cable trays in buildings.

Contrary to the above, there are a number of green cables (approximately six) on the 354' elevation of the Unit 2 auxiliary building which are not installed in a conduit, a wireway, or a cable tray. These cables come out of the south wall of the south piping area, approximately nine feet above the floor. The cables are run for approximately 12 feet between the wall and cable trays mounted adjacent to the wall before entering safety-related cable tray EB 216.

This is a Severity Level V Violation. (Supplement I)(50-368/8321-06)

RESPONSE:

As corrective action for Item 50-368/8321-06, Electrical Cable Installation Not in Accordance with Design Drawing, a job order has been initiated to return the green cables to the cable tray. The exact method (repulling cable or cut and weld on tray brackets) is being evaluated. It will be required to be an outage job.

The subject cables were installed prior to 1979, based on the current administrative controls on modifications, no further action is needed to prevent recurrence. Cable routing will be corrected during 2R3, approximately December 1, 1983.