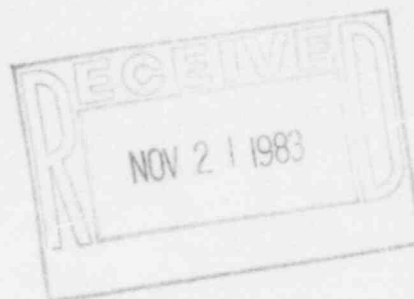




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November 14, 1983



ØCAN118306

Mr. John T. Collins  
Regional Administrator  
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  
Regulatory Response and Commitment  
Control Program

Gentlemen:

This is our tenth monthly report on the progress of the Regulatory Response and Commitment Control Program. This report will be our final report since those items for which we have been required to submit progress, are now complete. As stated in our September 29, 1983 letter, our commitments consisted of both short and long term actions. For the short term, our commitments and actions are summarized as follows:

Short Term Items

1. Full and rapid implementation of a Regulatory Response Program.

Response:

As we indicated in our letters to you dated January 14, 1983 (ØCANØ183Ø3) and February 14, 1983 (ØCANØ283Ø3), interim guidelines were implemented to assure control of our regulatory response activities until permanent procedures could be revised. Our Quality Assurance Department audited the implementation of those guidelines and the guidelines were revised to incorporate recommendations resulting from the audit.

This item became part of a long term action item and is discussed below.

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2. Daily monitoring of the centralized commitment tracking system to ensure proper updating.

Response:

By January 1983, the COMTRAC system had been successfully implemented and was being properly used and implemented to ensure monitoring of commitments. Daily monitoring of the system continued for several months thereafter to ensure the overall quality of the system was maintained and the evolution of the system was properly directed.

This short term action was considered to be completed and the item was closed by our February 14, 1983, letter (ØCANØ283Ø3).

3. A program for verification of commitments before such commitments are considered to be met and before letters are sent to the NRC.

Response:

Interim guidelines were established and implemented by November 1982. An audit on compliance with the new guidelines was conducted in December 1982, by the Quality Assurance Section and the results were incorporated as necessary into those guidelines.

This item continued as a long term action item and is discussed below.

4. An identification system for design change packages that pertain to NRC commitments.

Response:

As stated in our January 14, 1983 response (ØCANØ183Ø3), this system has been implemented.

This short term action was considered to be closed by that letter.

5. A feasibility study for prioritizing responses to NRC actions according to nuclear safety significance.

Response:

This study was moved to a long term action item and is discussed below.

#### Long Term Items

In the longer term, three specific items were identified as being required, and these have been the subject of our monthly progress reports since our report dated March 14, 1983 (2CANØ383Ø4). A summary of these long term actions is as follows:

1. Verification of implementation of commitments made since January 1, 1979.

## Response:

Approximately October 20, 1982, a review was completed of AP&L files for the period January 1, 1979, to present date to identify and tabulate all commitments made to the NRC. Commitment packages were prepared for subsequent verification and tracking.

From this effort, over 2,000 commitments were identified with approximately 60 potential discrepancies which required additional review and investigations.

At this reporting only six items are remaining, and these are associated with AP&L's response to IE Bulletins 79-02 and 79-14. As discussed in our previous report, an engineering review is being conducted to verify completion of work associated with these bulletins, and status of this review will be addressed via separate status reports.

As previously stated, this item is considered closed.

## 2. Procedure revision and commitment tracking.

## Response:

As of our April 14, 1983 report (2CAN048304), draft procedures were undergoing internal review and revision, and formal approval of those procedures and training of Licensing personnel was scheduled for the week of April 25, 1983.

By the time of our July 14, 1983 report (0CAN078302), the procedures had been revised and issued and appropriate training had been conducted. This item was considered closed.

In our April 14, 1983 report (2CAN048304), we stated an individual had been assigned to address the passive commitment tracking issue, and by July 14, 1983, several information gathering meetings had been held with other utilities and system vendors.

Subsequently a detailed report was developed for internal review which presented a proposed concept for a commitment tracking system for use at AP&L. Utilizing the results of that review, information summarizing the need for such a system and describing its scope and intended operation was assembled for management review and approval. This submittal was made on October 28, 1983.

Our current plans are to continue to proceed with the development and implementation of a commitment tracking system. However, this effort will be in a developmental and/or testing stage for several months. We believe that for the purposes of the required monthly report submittals, this item is closed. As previously stated our COMTRAC system is currently serving to track action commitments.

3. Priority scheme for nuclear regulatory issues.

Response:

As early as our March 14, 1983 report (2CAN038304), we stated that an initial scheme for setting priorities for addressing regulatory requests had been developed, and that the scheme would be tested on a few long term items in support of our capital planning case.

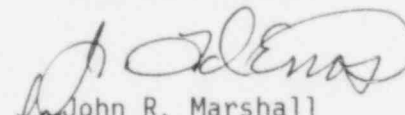
Additionally, we developed guidelines for use of this priority scheme to determine if it could be used by the Licensing section. These guidelines have now been reviewed within that section, and we have determined that system is not suitable for use as applied to all of Licensing's regulatory activities.

Currently, Licensing is a member of a task force charged with the responsibility of developing a priority scheme for use by all Energy Supply departments. This priority scheme will be a management tool for use in prioritizing major activities to be conducted at ANO. As a minimum, that scheme will consider Safety, Regulatory Mandates, Requirements to Return Unit On-line, and Economics. The priority scheme already developed will be a consideration in the work conducted by this task force.

We believe this completes our requirement to conduct a feasibility study, and therefore, we consider this reporting requirement closed. However, we will continue to evaluate the priority scheme.

As indicated above, we believe all our requirements as specified in your letter (2CNA018305), to AP&L for monthly reporting, have been completed. Therefore, this will be our final report on the progress of the Regulatory Response and Commitment Control Program. However, as also indicated above, AP&L intends to continue to work on certain items (e.g., commitment tracking). This will include our continued investigation of the needs for completing other items identified through discussions with AP&L management during review of the Regulatory Response Program.

Very truly yours,

  
John R. Marshall  
Manager, Licensing

JRM: LVP: ac