



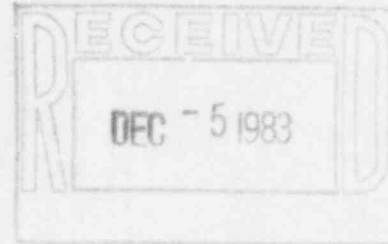
ARKANSAS POWER & LIGHT COMPANY

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

November 25, 1983

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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  
Response to Inspection Report  
50-313/83-19 and 50-368/83-19

Gentlemen:

In response to your October 27, 1983 (ØCNA1Ø8314) inspection letter and Notice of Violation, the following information is provided (in two parts) as our 30-day response.

In your transmittal letter, the following "Finding" was identified:

Finding

Shift supervisors and duty emergency coordinators were interviewed during the inspection to determine their knowledge and understanding of the emergency plan implementing procedures. We are concerned that a number of inadequate responses were received when plant conditions other than those specifically addressed in the Arkansas Power and Light Company Emergency Plan were presented as problems. Therefore, your reply should also address, in particular, those actions taken or planned to improve the emergency action level decision making and offsite notification for those individuals having that responsibility.

Our response is provided as follows:

Response

As stated in our letter (ØCANØ6832Ø) dated June 30, 1983, an emergency classification and emergency action level scheme compatible with the schemes in Appendix 1, NUREG-0654 has been established. The current ANO Emergency Action Level Identification Criteria was developed from the basis and rationale of Appendix 1, NUREG-0654 with consideration

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for those initiating conditions of greatest probability specific to ANO that might adversely affect normal plant operations, plant safety and safeguard systems, and/or plant security as well as the health and safety of the public. The example initiating conditions listed in Appendix 1, NUREG-0654 were used as principal guidance in developing the ANO Emergency Action Level Criteria and were considered, as stated in NUREG-0654, as examples only. The ANO Emergency Action Level Criteria meets AP&L's need for a simplified scheme which is condition oriented rather than parameter oriented to facilitate emergency response actions and emergency classification decisions. Depending upon the event, ANO personnel utilize the Emergency Operating Procedures and Technical Specifications to reference mitigating actions and those instruments, parameters or equipment status/value requiring the initiation of response actions. This philosophy is consistent with that used to develop the ANO upgraded EOPs as specified by NUREG-0737 Supplement 1. Without basing decisions on any single parameter value, the adverse situation is then categorized as a condition which either affects the reactor coolant system, potential for offsite releases, control room habitability, and/or security. The appropriate emergency class is then determined from the ANO Emergency Action Level Criteria.

We note that within the Details section of your report ANO personnel could not "correctly" respond when given NUREG-0654 examples. However, in the transmittal letter the concern is stated that inadequate responses were received when given plant conditions. We believe this finding is the result of the use of NUREG-0654 examples as opposed to plant conditions. Since ANO personnel are trained to react to plant conditions rather than specific examples, depending upon the examples selected from Appendix 1 to NUREG-0654, the Shift Supervisor or Duty Emergency Coordinator may not have been able to accurately assess the plant condition and determine if an EAL existed without additional information as would be available in a real situation. As stated above, our EAL criteria are condition oriented, and, as such, are consistent with our training requirements/philosophy. The adequacy of this training and our ability to distinguish between EAL classifications was verified during the subject inspection where it was found that "the shift supervisors' and the duty emergency coordinators' answers were generally correct." We believe that our EAL initiating conditions adequately address the initiating conditions of NUREG-0654.

Concerning your reference to procedures for offsite notification, EPIP 1903.10 has been revised to clarify the responsibility for making offsite protective action recommendations.

Furthermore, your subject letter transmitted Notices of Violation regarding two activities. These are repeated below along with our responses.

A. Failure to Meet Record Retention Requirements

Arkansas Unit 2 Technical Specification, Section 4.3.3.4, "Meteorological Instrumentation - Surveillance Requirements," requires demonstration of meteorological instrument operability at frequencies shown in Table 4.3-5 of the Technical Specifications. Procedures 1304.015, "Meteorological Instrumentation Calibration," is the implementing procedure for this surveillance. Technical Specification Section 6.10.1.d, "Administrative Controls - Record Retention,"

requires records of such surveillance be retained for at least five years.

Contrary to the above, the licensee was unable to retrieve for review by an NRC inspector the meteorological instrumentation surveillance records for the period July 16, 1981 through July 19, 1982. These documents were requested during the period July 18-22, 1983, but could not be retrieved by the licensee by September 28, 1983.

Response:

A search has been conducted for the missing meteorological surveillance records, and all missing records have been found and are now in permanent plant records except for one test (identified by NRC during the inspection) performed on September 13, 1982. Although this test record can not be located, it has been determined by conversations with the Maintenance Supervisor that this test was performed. Furthermore, additional investigation has determined that the required surveillance records have been entered into our files.

Our investigation determined that the missing records had not been sent to the files in a timely fashion. This problem has been discussed with responsible individuals, and in the future all records will be transmitted to files within one month.

We believe that we are now in full compliance with this item.

B. Failure to Conduct 12 Months Emergency Preparedness Program Review

10 CFR Part 50, Section 50.54(t) states that the licensee shall provide for a review of its emergency preparedness program at least every 12 months by persons who have no direct responsibility for implementation of the emergency preparedness program and that the review shall include an evaluation for adequacy of interfaces with state and local governments and of licensee drills, exercises, capabilities, and procedures.

Contrary to this requirement, the licensee failed to provide for an independent emergency preparedness program review, including all of the required review elements, during the period November 3, 1980 through July 22, 1983.

Response:

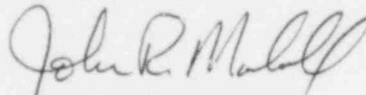
AP&L conducted annual independent reviews of its emergency preparedness program in accordance with our Quality Assurance Procedure 13 (QAP-13) on July 18, 1981, September 22, 1982, and July 11, 1983, to satisfy the requirements of 10CFR50.54(t). Although the requirement for annual review was not specifically stated as being a component of this Notice of Violation, it was addressed in the subject text. As such, we are preparing a revision to section 8.2 of the Emergency Plan to further address this requirement. This revision is scheduled for implementation by November 30, 1983.

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The Notice of Violation specifically stated that our program reviews have not addressed all the 10CFR50.54(t) elements. The review of AP&L's emergency preparedness program is performed by the Quality Assurance Section utilizing Quality Assurance Procedure 13 (QAP-13), "Emergency Planning." This procedure has been revised, and we believe it now includes in the annual review, 10 CFR 50.54(t) elements regarding an evaluation for adequacy of interfaces with state and local governments and of licensee drills, exercises, capabilities, and procedures.

With the above revision to QAP-13, we believe we are in full compliance with the requirements of 10 CFR 50.54(t).

Very truly yours,

A handwritten signature in cursive script, appearing to read "John R. Marshall".

John R. Marshall  
Manager, Licensing

JRM:KE:s1