

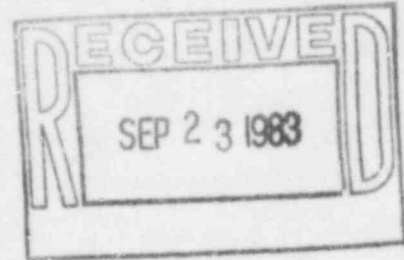


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September 20, 1983

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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

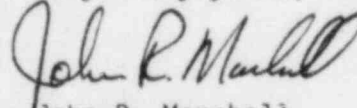


SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Response to Inspection Report
50-313/83-17 and 50-368/83-17

Gentlemen:

The subject inspection report has been reviewed. The attachment responds to the "Notice of Violation" included in the reports.

Very truly yours,


John R. Marshall
Manager, Licensing

JRM:RJS:rd

Attachment

cc: Mr. Norman M. Haller, Director
Office of Management & Program Analysis
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Richard C. DeYoung
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, DC 20555

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Q PDR

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of June 27 - July 1, 1983, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1983, the following violation was identified:

Failure to Follow Design Change Control Procedures

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 instances of failure to follow procedures controlling activities affecting quality (design change control) were identified:

- a. Little Rock General Office Engineering Procedure 202, "Design Process," Revision 7, Section 4.1.3, requires that if no pending DCPs impact the change, this shall be so noted on the Design Change Summary.

Contrary to the above, a Design Change Summary contained in Design Change Package (DCP) 83-2056 did not note that no pending DCPs impacted the change.

Response:

A review of this item indicated that only one engineering discipline involved in the Design Change Package (DCP) 83-2056 omitted the required note, while the other three disciplines did, in fact, address it in the proper manner. The incident is considered an isolated case. Immediate action taken was to advise the offending discipline of the omission and to initiate corrective action. Revision 8 of Energy Supply Procedure (ESP) 202 now provides means of including the necessary documentation. A field change notice (FCN) will be written by October 1, 1983, to correct the affected DCP. On October 1, 1983, full compliance will be achieved.

- b. Topical Report (APL-TOP-1A), Revision 5, Section 6.2.4, requires that obsolete and superseded documents shall be destroyed (except for one file copy) or marked to prevent inadvertent use.

Contrary to the above, Little Rock General Office Engineering Procedure 100, "Procedure Development Methodology and Documentation Standards," Revision 4, for control and issuance of procedures does not provide for destroying or marking obsolete and superseded documents. An Energy Supply Department procedures manual assigned to the General Manager, Engineering Services contained an unmarked obsolete Procedure No. 3-12 dated June 27, 1980, titled "Access to Management Nuclear Safety Concerns."

Response:

The outdated document, "Access to Management Nuclear Safety Concerns," has been destroyed. The Energy Supply Procedure (ESP) 100 was reviewed by responsible personnel and revised to comply with the current AP&L-TOP-1A. ESP-100 was revised effective September 1, 1983, to preclude the recurrence of this violation. Full compliance was achieved approximately June 30, 1983.

- c. Procedure 1032.01, "Design Control," requires that Form 1032.01H be completed whenever a safety-related valve is added to a system to inform the Plant Analysis Section of a potential change in the Inservice Inspection Testing Program required by ASME Section XI.

Contrary to the above, Form 1032.01H was not completed for DCP 82-2030 or for Field Change Notice (FCN) 1 to DCP 82-2040A. DCP 82-2030 and FCN 1 to DCP 82-2040A added safety-related valves to a system.

Response:

As stated in the above notice, Form 1032.01H serves to notify the Plant Analysis Section of the addition of a safety-related valve to a system. Although the form was not completed in this case, the Plant Analysis Superintendent's review of DCPs per Procedure 1000.13 meets the intent of this requirement. In order to eliminate this duplication, a permanent change to procedure 1032.01 was issued to delete the requirement for Form 1032.01H. To issue a Form 1032.01H for the specific DCP mentioned at this time would serve no purpose. Full compliance was achieved on August 5, 1983.

- d. Procedure 1032.01, "Design Control," requires that revised calculations be attached to FCNs.

Contrary to the above, FCN 1 to DCP 82-2028 was issued without a calculation attached. The FCN installed a seismic restraint on the auxiliary gantry.

Response:

Even though the design intent was not altered, the fact the calculations were utilized in the design revision verification requires that the calculations be attached. This is believed to be an isolated case, and no changes to the Design Control Procedures are warranted. The appropriate personnel involved were counseled on the procedural requirement to attach any calculations generated during design development. Thus, we are in full compliance.

- e. Procedure 1032.03, "Preparation, Review, and Approval of Calculations and Reports," requires that calculations be reviewed and approved.

Contrary to the above, FCN 1 to DCP 82-2028 was issued to install a seismic restraint for the auxiliary gantry and the supporting design calculation was not independently reviewed or approved.

Response:

Review of this item indicates the field change notice, FCN 1, did not require a calculation revision because there was no change in the design intent. FCN 1 of the design change package (DCP) specifically states that "...the new design will accomplish the same intent of the original design." Therefore, it was not an intent change and the calculation would only require revision for as-built purposes. The FCN also states that "... the preliminary calculations used to design these modifications will be transmitted to the Little Rock General Office for verification and for revision of the original design calculations." Further documentation, Engineering Action Request (EAR) 83-399, verifies that Calculation 82D-2028-01 was revised to reflect modifications made to seismic restraints within the appropriate time frame. Thus, the modification was installed under an appropriately independently reviewed and approved FCN, and no changes to the Design Change Control Procedures are warranted.

- f. Procedure ESP-201, "Design Change Package Control," requires that all changes to Q-designated packages be brought to the attention of the Project Engineer and/or his Group Leader by the plant staff. ESP-201 also requires that a conversation memorandum be prepared to document whether it is necessary to stop work to perform an evaluation of the change or whether the evaluation can wait until DCP closeout.

Contrary to the above, conversation memorandums are not being prepared, in most cases, for revisions to Q-designated DCPs. It is also noted that ANO procedures do not commit to preparing conversation memorandums nor do the procedures require that the Little Rock engineering group be notified when a revision is made to a Q-designated DCP. This appears to be an interface problem between the AP&L Little Rock office and the ANO site.

Response:

In response to this item, Procedure 1032.11 was revised to assure that the L.R. Project Engineer is on distribution for approved DCPs and revisions. Procedure 1032.02 was also revised to clarify the distribution of documentation of significant technical discussions regarding DCPs. The appropriate engineers were reminded of the current requirement for conversation memorandums concerning design changes to Q-designated packages, however, in order to assure consistency between Little Rock and ANO procedures, ESP 201 will be revised to delete the requirement for such memorandums. Full compliance will be achieved upon completion of the revision of ESP 201 by October 1, 1983.