

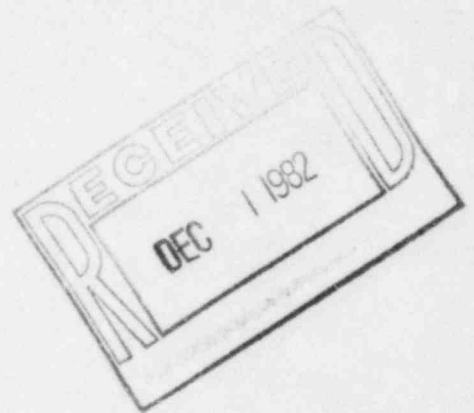


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November 24, 1982

ØCAN118221

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
50-313/82-14 and 50-368/82-11



Gentlemen:

We have reviewed the Items of Noncompliance included in the subject reports. Attached are our responses to the "NOTICE OF VIOLATION" and the "NOTICE OF DEVIATION" included in these reports. In addition, in Attachment 2, we address the general concerns expressed in your letter (ØCNA1Ø8221) transmitting the reports.

Very truly yours,

John R. Marshall
Manager, Licensing

JRM:MCS:rd

Attachment

cc: Mr. Richard C. DeYoung, Director
Mr. Norman M. Haller, Director

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NOTICE OF VIOLATION

As a result of an NRC inspection conducted during the period of June 21-25, 1982, and in accordance with the NRC Enforcement Policy (10 CFR part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violation was identified:

10 CFR 71.5, "Transportation of Licensed Material," prohibits a licensee from delivering any licensed material to a carrier for transport or transporting licensed material, unless the licensee complies with the applicable requirements of the regulations appropriate to the mode of transport, of the Department of Transportation in 49 CFR Parts 170-189. 49 CFR 173.394, "Radioactive Materials in Special Form," and 49 CFR 173.395, "Radioactive Materials in Normal Form," require that Type A quantities of special and normal form radioactive material must be packaged for transport in a container meeting DOT specification 7A general packaging requirements and maintain on file, for at least one year after the latest shipment, a complete certification and supporting documentation that the package meets instruction and design requirements.

Contrary to the above, four shipments of radioactive materials shipped from the site between October 1981 and June 25, 1982, were shipped as Type A quantities in various containers, for which the licensee could not provide the container certification as required by 49 CFR 173.394 and 173.395.

This is a Severity Level IV Violation (Supplement V). (313/8214-23) (368/8211-23).

Response:

A review of procedures governing the shipment of radioactive materials revealed an omission on the instruction sheet used to complete the shipping papers. Instructions for the "type container" block were not provided. Procedure 1603.003, "Radioactive Material Shipments" has been revised by permanent change number 3 to provide instructions to attach container certification and supporting documentation to the file copy of the shipping papers when required. Permanent change number 3 to procedure 1603.003 was issued on November 12, 1982.

Based on the above, AP&L concludes full compliance has been achieved.

NOTICE OF DEVIATION

As a result of an NRC inspection conducted during the period of June 21-25, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following deviation was identified:

NUREG-0737 - Clarification of TMI Action Plan Requirements, Item II.B.2, "Design Review of Plant Shielding and Environmental Qualification of Equipment for Spaces/Systems," which may be used in postaccident operation, recommended that a design review be performed to ascertain if vital areas of the nuclear power plant could be occupied for the necessary period to permit an operator to aid in the mitigation of or recovery from an accident. In a letter of March 31, 1980, from Mr. David C. Trimble, Manager, Licensing, Arkansas Power and Light Company, to Mr. Darrell G. Eisenhut, Director, Division of Licensing, U. S. Nuclear Regulatory Commission, stated that procedures for ANO Unit 1 would be modified to warn against use of decay heat removal systems during accidents involving significant core damage. A letter of November 30, 1981, from Mr. David C. Trimble to Mr. Darrell G. Eisenhut, stated that this procedural change had been accomplished.

In deviation from the above, it was discovered that this procedural change had not been accomplished. (313/8214-24).

Response:

The apparent deviation was discussed during an exit interview on June 25, 1982, relative to IE Inspection 82-14/82-11. The validity of this deviation was subsequently investigated by AP&L and the results forwarded to NRC by letter dated September 29, 1982, Marshall to Seidle (ØCANØ98219).

AP&L concludes that no further response is required on this item.

ATTACHMENT 2

This response is in reference to the routine inspection conducted during June 21-25, 1982, as described in your letter of October 25, 1982 (ØCNA1Ø8221).

Your letter stated that NRC is concerned over the lack of sufficient management attention provided to Arkansas Nuclear Station activities involving the preparation, packaging, and transport of radioactive materials, especially in the following areas:

1. Lack of detailed station procedures covering all aspects of radioactive material packaging and transportation.

Response:

During this inspection, the NRC reviewed the following procedures.

- o Procedure 1603.003 "Radioactive Material Shipments"
- o Procedure 1603.004 "Curie Content of Radioactive Waste Containers"
- o Procedure 1603.005 "Notification of Radioactive Material Shipments"
- o Procedure 1603.006 "Solidification of Spent Resin"
- o Procedure 1603.007 "Control of Radioactive Material"
- o Procedure 1603.009 "Classification and Marking of Radioactive Material"
- o Procedure 1603.010 "Handling of Radioactive Material Containers"

These procedures contain detailed instructions on the normal functions performed by the Radwaste Section. Since the June 21-25, 1982, routine inspection, over 50% of the above procedures have been upgraded by revisions and changes. Additional revision and review is in progress. The above is stated to document on going activities in the Radwaste Section and AP&L's concern and attention to procedures covering radioactive material packaging and transportation.

We believe that the number of procedures governing the packaging and transportation of radioactive waste is adequate, and we will continue to change and update these procedures to insure that radioactive waste is packaged and transported in accordance with regulatory requirements.

2. The development and implementation of an approved training and retraining program for personnel involved in the station's radioactive material transportation activities.

Response:

A Radwaste Training Program had been initially developed in the Fall of 1980; however, it was later determined in the special NRC inspection conducted the week of September 13, 1982, to be deficient in meeting all commitments in IE Bulletin 79-19. To correct the deficiency and formalize the training, development of a structured Radwaste Training Program using the ISD (Instructional Systems Development) approach was begun in September, 1982. To date, the instructional modules have been

identified, and the terminal, enabling, and lesson objectives have been completed. Additionally, pre and post examination questions, as well as approximately one-half of the lesson plans, have been written. Completion of the remaining lesson plans along with the Radwaste Training Procedure and the schedule for implementing the initial and retraining programs, is planned for December 31, 1982.

3. Adequate management and quality assurance control over the Radwaste Coordinator activities to ensure applicable NRC and DOT regulations are met.

Response:

AP&L Management is positively involved in the activities of the ANO Radwaste Section through annual management and operational audits conducted by the AP&L Safety Review Committee and the Energy Supply Quality Assurance Section. Additionally, ANO Quality Control inspections of radwaste shipments have been expanded to include the inspection of all types of radioactive waste shipments. This expanded involvement was begun in May, 1982 and has continued through the present. The Radwaste Coordinator also performs an inspection of each barrel or box prior to loading on the transport vehicle for shipment to the disposal site. These inspections have been initiated to ensure compliance with all applicable NRC, DOT and state regulations.