



ARKANSAS POWER & LIGHT COMPANY
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December 17, 1982

2CAN128208

Mr. W. C. Seidle, Chief
Reactor Project Branch #2
U. S. Nuclear Regulatory Commission
Region I/
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

SUBJECT: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Response to Inspection Report
50-368/82-32

Gentlemen:

Your letter of November 12, 1982, (2CAN118203) reports on an inspection of ANO-2 conducted by Messrs. Tomlinson and Cummins of your staff on October 25-29, 1982. There was one unresolved item for which you requested an assessment of the basic cause of the deficiencies, the corrective action we plan to take to prevent recurrence of these types of deficiencies, the changes we plan to make to assure timely processing of as-built drawings and the dates these actions will be completed.

After a thorough review of the hanger deficiencies (summary provided in Attachment 1) identified by AP&L in October of 1982, we have concluded that there were several basic causes of the deficiencies. The most significant of these are:

1. Specifically, in the case of the small service water piping replacement with stainless steel, the design change package instructions and the contractor failed to adequately address the need for removal and replacement of pipe hangers to complete the installation;
2. The as-built drawings generated by the contractor for the DCP did not reflect the final as-built configuration of the hangers;
3. The contractor failed to properly document approval for deviations from the design as issued prior to installation.

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PDR ADOCK 05000368
Q PDR

MEMBER MIDDLE SOUTH UTILITIES SYSTEM

December 17, 1982

Procedural changes will be made to require pre-planning with regard to Design Change Package (DCP) installation to identify items which must be removed or disturbed to properly install the DCP and to ensure that the system is properly restored at completion of the installation. These procedure changes will be in place by February 1, 1983.

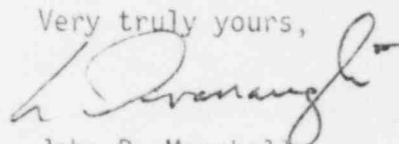
In January of 1982, AP&L began inserting in each DCP Installation Verification forms. This form specifically addresses the necessary as-building to be performed by the installer of a DCP. This form was not in use at the time the DCPs exhibiting the deficiencies were approved. Since January of 1982, it has been in use on a trial basis and has undergone several modifications. A similar form will be required for DCPs by procedure changes to be completed by January 1, 1983.

The above described form also requires a review of the as-built configuration against the design requirements and to identify any differences prior to returning the system to service.

It should be noted that in every case as-built hanger sketches were available on-site and were utilized in the hanger walkdowns. With regard to the delay in assembling walkdown packages, it is difficult to identify all of the hangers on a particular section of large pipe by hanger number without the Stress Calculation Sheet. Individual hanger sketches are filed by line class and each is identified on the sketch as to its location. When the need for a walkdown such as was performed is identified, the Stress Calculation Sheets are obtained from Engineering. The Stress Calculation Sheets graphically illustrate the hanger sketch number by relative location on the pipe and facilitate retrieval of the as-built sketch from the files.

In the case of LTOP and High Point Vent piping, the "red-line" drawings were not incorporated by the contractor into the as-builts submitted to AP&L and are not related to the drawing control changes being implemented by AP&L. The recent transfer of all drawing control responsibility to the site (see 80CAN098110, dated September 30, 1981) permits all as-building to be performed on-site rather than relying on off-site facilities.

Very truly yours,



John R. Marshall
Manager, Licensing

JRM:JK:sc

Attachment

ITEM	UNIT 2 SM. PIPE SERVICE WATER	HIGH POINT VENTS	UNIT 2 LG. PIPE SERVICE WATER	L.T.O.P	UNIT 1 SM. PIPE SERVICE WATER	MAIN FEEDWATER	EDG
No. of Hangers Inspected	499	56	291	39	57	19	72
No. of Discrepant Hangers	136	29	50	6	17	6	18
No. of Hangers Okay as is	7	3	30	2	13	3	3
No. of Hangers to be As-Built only	24	18	13	2	1	0	15
No. of Hangers to be Verified	0	0	0	0	0	0	0
Anchor Bolt Check	0	0	0	0	0	0	0
No. of Hangers Reworked	105	8	7	2	3	3	0
No. Remaining to be Evaluated	0	0	0	0	0	0	0
System Declared Inoperable	NO	NO	NO	NO	NO	NO	NO

ATTACHMENT 1