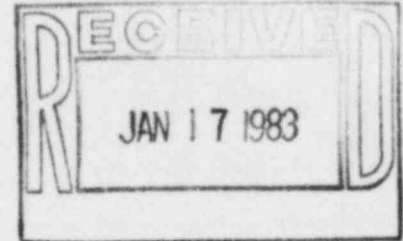




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January 14, 1983



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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
Regulatory Response and Commitment
Control Program Status Report

Gentlemen:

In Mr. William Cavanaugh III's letter to you of September 29, 1982 (ØCANØ98214), we outlined various steps that AP&L was taking to improve its approach to the review and control of letters and commitments to the NRC. Those steps included various interim actions as well as the development of a Regulatory Response and Commitment Control Program. We indicated in that letter that a status report on that Program would be provided by January 15, 1983. The purpose of this letter is to provide that status report.

The following is a listing of the interim actions as summarized in our September 29, 1982, letter along with the current status of each action.

1. Development of procedures and guidelines supporting the Regulatory Response Program is being expedited with particular emphasis on those program tasks determined to be of the highest priority.

STATUS: While the Regulatory Response Program is to be superceded in the future by the new Regulatory Response and Commitment Control Program, we have, as an interim measure, completed, or have separated into other on-going activities, those program tasks determined to be of the highest priority. Those tasks included the issuance of interim guidelines (effective November 8, 1982) on the development of responses to the NRC, the verification of information submitted to the NRC, and the operation of our centralized commitment tracking system (COMTRAC). One task that we have been unable to complete to date is the review of the COMTRAC data base with the Resident Inspectors. We have asked the

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Resident Inspectors to review this data base several times, but they have asked that the review be deferred until a later date. Because we feel it is important for the Resident Inspectors to understand the COMTRAC system, we reaffirm our commitment to review it with them.

2. An engineer in the Licensing Section was designated on September 1, 1982, to monitor our centralized commitment tracking system (COMTRAC) on a daily basis to see that it is being properly updated. This assignment will continue until we are satisfied that COMTRAC is being properly maintained and controlled.

STATUS: COMTRAC has been implemented successfully, and is being updated as needed. Nevertheless, we are continuing to devote engineering and management resources in the Licensing Section to assure that it is being properly maintained. We will continue to devote resources to this effort, as needed.

3. A program for verification of commitments was implemented on September 1, 1982. This effort, which utilizes ANO Special Projects, Quality Control, Quality Assurance and consultant personnel, provides for independent verification of commitments before they are closed and before letters are issued to NRC. The verification process will also be audited.

STATUS: We are continuing these measures for closure of commitments (although we are no longer using consultant personnel) and are using the new guidelines mentioned under item 1 above on information submitted to the NRC. An audit on compliance with the new guidelines was conducted in December 1982 by the Quality Assurance Section and the results will be used to improve the effectiveness of the guidelines. Auditing of the commitment closure verification will be included as part of our normal QA audit program.

4. A unique identification system for design change packages that pertains to a commitment to the NRC is being developed.

STATUS: This system has been implemented. It highlights those Design Change Packages (DCPs) pertaining to a NRC commitment.

5. A study to determine if there is an effective method for prioritizing responses to NRC actions according to nuclear safety significance has been initiated.

STATUS: This study is continuing and has been incorporated into our longer term action under the new Regulatory Response and Commitment Control Program.

In addition to these interim actions, we indicated in our September 29, 1982, letter that we were proceeding with development of a Regulatory Response and Commitment Control Program to further improve our approach to review and control of letters and commitments to the NRC. As we indicated in our previous letter, we had, at that time, outlined an initial approach to the development of this Program which we have followed. We also indicated that the Program was designed to be flexible and that the five

phases outlined may be altered as we proceeded. The only significant change in the program design that we have identified at this time is that phases 4 and 5 will be combined into one comprehensive program plan to assure that the efforts are appropriately coordinated. The following is a listing of the five phases of the Program along with the status of each phase.

- A. (Phase 1) Define objectives and goals of the program through discussion with AP&L management personnel, review of the existing Regulatory Response Program, and evaluation of existing procedures and systems. Develop recommended action plans for establishing a system for tracking commitments already implemented (i.e., passive commitment tracking) and for revising procedures at Arkansas Nuclear One (ANO) and the Little Rock General Office (LRGO) to incorporate appropriate provisions for controlling commitments. Develop methods for verification of actions taken on previous commitments. This phase will include evaluation of established working systems at other utilities for possible use by AP&L.

STATUS: Extensive work has been completed on this phase by both AP&L and consultant personnel. The consultant report has been issued to AP&L outlining preliminary action plans based on their meetings and interviews with AP&L personnel. We are now developing detailed action plans to address the items identified and are integrating the action plans into one comprehensive program plan for implementation as noted above. The preliminary results of this phase were reviewed by the Institute of Nuclear Power Operation (INPO) during the period of December 13-16, 1982, as mentioned in our September 29, 1982, letter. INPO also independently reviewed the activities of our Plant Safety Committee (PSC) and Safety Review Committee (SRC). The results of the INPO's review have just been received and are now undergoing evaluation by AP&L. We intend to use the INPO results to further improve and refine our action plans as we progress. Overall, phase 1 is about 95% complete at this time.

- B. (Phase 2) Review AP&L files for the period January 1, 1979, to present time to identify and tabulate all commitments made to the NRC. Prepare commitment packages that can be used for later verification and tracking.

STATUS: This phase involved the review by contract engineering personnel of AP&L correspondence with the NRC for the period January 1, 1979, through September 20, 1982. This activity was completed in October 1982.

- C. (Phase 3) Using commitment packages prepared in Phase 2, verify appropriate implementation at ANO or LRGO through review of documentation and installed systems and equipment using the methods established in Phase 1. This may involve statistical sampling of commitments with some groups of commitments receiving 100% verification due to safety implications or management decisions.

STATUS: Work on this phase was begun using contract engineering personnel in mid-October 1982. To date, over 1,600 commitments identified in Phase 2 have been completed under this task. Phase 3 is

now approximately 75% complete and we anticipate completion in early February 1983. Discrepancies that are identified during this verification process are being forwarded to our Licensing Section for evaluation and action and to the Quality Assurance Section for review of trends or programmatic implications, if any.

- D. (Phase 4) Develop and implement a system for tracking of commitments already completed (i.e., a passive commitment tracking system) using the approach identified in Phase 1. This system will supplement the active commitment tracking provided by our present centralized commitment tracking system.

STATUS: See Phase 5.

- E. (Phase 5) Revise applicable procedures related to the control of design change packages, job order procedures, correspondence, commitment tracking, quality assurance, quality control and other activities using the approach defined in Phase 1 to incorporate appropriate provisions for controlling commitments.

STATUS: As mentioned above, we now plan to combine Phases 4 and 5 into one comprehensive program plan which is now being finalized. Actions under these Phases will then be implemented.

In our September 29, 1982, letter, we indicated that our goal was to complete all five phases of this Program within six months. Since that time we have expended several hundred manhours of AP&L engineering and management resources as well as over \$240,000 for contractor support for this Program. We now find that it will require more time to complete all five phases of the program in the level of detail and completeness that we desire. We now expect that some of the action plans will take several months longer to complete. We are prioritizing our actions in the comprehensive plan to assure that the highest priority items are addressed first and that all items are addressed as expeditiously as possible while keeping in mind our basic objective of improving our review and control of letters and commitments to the NRC.

On a related matter, we mentioned in our September 29, 1982, letter that we were evaluating approaches to providing an individual on site to provide independent oversight of plant activities. The status of this activity is as follows.

Middle South Utilities has just approved a new organization, which will provide an oversight function for the System's nuclear operations. Included within this organization is Nuclear Assurance, which will report functionally to the Middle South Utilities Nuclear Oversight Committee. The Middle South Utilities Nuclear Oversight Committee is comprised of senior management representatives from each operating company (AP&L, LP&L, and MP&L) and Middle South Services that have nuclear responsibilities. Mr. William Cavanaugh III is AP&L's representative on the Oversight Committee.

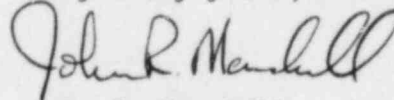
One of the key functions of Nuclear Assurance is to provide a System resident engineer at each of the System's nuclear sites. This engineer will

January 14, 1983

be independent of the operating station staff and will report to the Middle South Services' Director of Nuclear Assurance and the System Nuclear Oversight Committee. A complete delineation of the resident engineer's functions and responsibilities has not yet been determined. Steps are being taken to implement this organization, but a date has not yet been established when the organization will be fully functional.

In summary, we are continuing to devote substantial attention to these activities. In light of the magnitude of this program and our desire to keep you informed of our actions, we will provide another status report on this program to you by July 15, 1983.

Very truly yours,

A handwritten signature in dark ink, appearing to read "John R. Marshall". The signature is fluid and cursive, with the first name "John" being the most prominent.

John R. Marshall
Manager, Licensing

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