



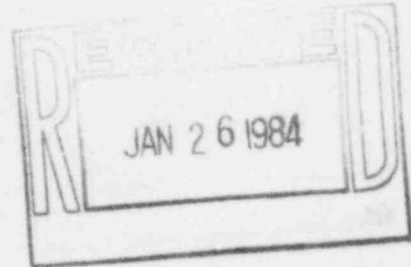
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January 20, 1984

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Mr. J. E. Gagliardo, Director
Division of Resident Reactor Projects
and Engineering Programs
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 Reports
50-313/83-23 and 50-368/83-23

Gentlemen:

The attached is provided as our response to the "Notice of Violation" of the subject inspection report.

Very truly yours,

John R. Marshall
Manager, Licensing

JRM:DEJ:s1

Attachment

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NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of August 22-26, 1983, the following violations are identified. AP&L's response to each of these violations follows the finding.

A. Testing and Maintenance

10 CFR 73.55(g)(1) states, in part, "All alarms, communication equipment, physical barriers, and other security related devices or equipment shall be maintained in operable condition."

Arkansas Nuclear One's approved Industrial Security Plan (ISP), Section 3.2.1.5, states, in part, "The explosive detectors have local annunciators and will detect a minimum quantity of 500 grams of nitrate based explosives (e.g., nitroglycerin) or acceptable substitutes within 95% confidence...."

Arkansas Nuclear One's approved Security Administration Procedure entitled, "Operational Test of Explosive Detectors," No. 1043.19, dated May 5, 1981, states, in part, "The explosive detectors shall be able to detect ...with 95% accuracy."

Contrary to the above, when the inspector requested and witnessed a testing of the explosive detectors, two of the four detectors did not meet the aforementioned "95% accuracy" criterion.

This is a Severity Level IV Violation (Supplement III) (50-313/8323-01)

Response:

Upon further review of items A and B by the NRC Region IV staff, it was determined that neither item A nor B constitute a violation.

This finding was relayed to AP&L in a telephone conversation between NRC's Mr. Bill Johnson and AP&L's Mr. John Marshall on January 5, 1984. Mr. Johnson further indicated that no written response was necessary to either of these items.

B. Testing and Maintenance

10 CFR 73.55(g)(1) states, in part, "All alarms, communication equipment, physical barriers, and other security related devices or equipment shall be maintained in operable condition."

Section 3.1.4, entitled, "Intrusion Detection Devices," in Arkansas Nuclear One's approved ISP commits to a security emergency power supply system. When the primary power fails, this emergency power supply system is to switch over and provide power to continue operation of the security alarms and nonportable communication equipment.

Contrary to the above, when the inspector requested a test of the emergency security system power supply, the switchover to this secondary system did not operate as required by 10 CFR 73.55(g)(1) or by the approved ISP.

This is a Severity Level IV Violation (Supplement III) (50-313/8323-02)

Response:

See response to item A.

C. Appendix C to 10 CFR Part /3

Arkansas Nuclear One's approved Safeguards Contingency Plan, Section 3.6, states that, "The Security Coordinator shall ensure that copies of the Industrial Security Plan and Security procedures are available to security personnel as required. One set of the above documents should be maintained at the CAS."

Contrary to the above, a copy of the licensee's ISP was not available to security personnel while in Central Alarm Station.

This is a Severity Level IV Violation (Supplement III) (50-313/8323-03)

Response:

Section 1.4, "Definitions," of the approved Arkansas Nuclear One Safeguards Contingency Plan provides definitions for terms and acronyms used in the plan. In this section of the plan, we have defined the word should to mean "used to denote a recommendation" and the word shall to mean "used to denote a requirement." In Section 3.6 of the Safeguards Contingency Plan, the word should is used pertaining to having a copy of the Arkansas Nuclear One Industrial Security Plan and Security procedures available in the Central Alarm Station (CAS). Therefore, according to the Safeguards Contingency Plan there is no requirement to have a copy of the Industrial Security Plan (ISP) in CAS, only a recommendation. This recommendation was not enacted at the time of the inspection because copies of the ISP were conveniently available to the CAS operators in the Main Guard Station (which is activated 24 hours per day), the Security Coordinator's office, and the Security Force Supervisor's office. All three of these locations are within 25 feet of the CAS. Security procedures were also available in CAS at the time of the inspection. These procedures are used for the day-to-day implementation of the ISP.

The same day the inspector brought this finding to our attention, a copy of the ISP was placed in CAS. This copy was placed in CAS not because we felt we were in violation of our plan, but because of the inspector's concern. We maintain that this finding does not constitute a violation and ask that the Commission reevaluate this finding.