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U. S. Nuclear Regulatory Commission
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Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Response to Inspection Report 50-313/95-03; 50-368/95-03

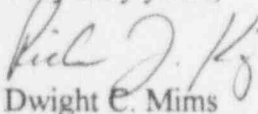
Gentlemen:

Pursuant to the provisions of 10CFR 2.201, attached is the response to the violation identified during the inspection of activities associated with identification and correction of discrepancies regarding the seismic supports for the Arkansas Nuclear One Unit 1 Reactor Building Cooling (RBC) Units.

The NRC Inspection Report indicated that inadequate seismic restraint on the RBC Units was a known condition in 1R11. The discrepancy between the as-built drawings and the apparent seismic supports for the RBC Units was identified and documented during refueling outage 1R11. Engineering inspections and judgment during 1R11 provided reasonable assurance that the RBC Units were seismically supported by welds and only a drawing discrepancy existed. However, it was not until refueling outage 1R12 during the effort to upgrade the as-built drawing details, that the actual deficient condition was identified at which time prompt actions were taken to address the condition.

Should you have questions or comments, please call me at 501-858-4601.

Very truly yours,

for 
Dwight E. Mims
Director, Licensing

DCM/bws

Attachments

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NOTICE OF VIOLATION

During an NRC inspection conducted on February 19 through April 01, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C, the violation is listed below:

10CFR Part 50, Appendix B, Criterion XVI requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, and nonconformances, are promptly identified and corrected.

Contrary to the above, from September 1993 to March 1995, the licensee failed to take prompt and adequate corrective action for a condition adverse to quality. Specifically, a deficiency with the seismic installation of the Unit 1 Reactor Building Coolers identified by the licensee during Refueling Outage 1R11 was not properly resolved until Refueling Outage 1R12.

This is a Severity Level IV violation (Supplement 1) (313/9503-02).

Response to violation 50-313/9503-02

(1) Reason for the violation:

The NRC identified in Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46", a concern with the capability of safe shutdown equipment in older operating nuclear power plants to withstand the effects of a safe shutdown earthquake (SSE) and still function properly afterwards.

In Generic Letter 88-20 (Supp 4), "Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities", the NRC requested an evaluation of potential equipment vulnerabilities as a result of the plant being subjected to a theoretical earthquake of 0.3G ground acceleration for the seismic portion; and to review the plant against other external events such as high winds and tornadoes, lightning, external floods, and seismically induced internal fires.

The Seismic Qualification Utility Group (SQUG) developed guidelines and criteria for verifying the seismic adequacy of equipment in operating nuclear power plants based on past experience of industrial facilities which have undergone earthquakes. These guidelines and criteria were being used in the resolution of these two generic letters.

Reactor Building walkdowns were conducted during Arkansas Nuclear One refueling outage 1R11 in support of the resolution of USI A-46/IPEEE. The Reactor Building Cooling (RBC) Units (VCC-2A, VCC-2B, VCC-2C & VCC-2D) were included on the list of equipment to be walked down for verification of seismic mounting. 1R11 ended in October 1993, however, ANO was not required to complete these walkdowns and resolve any discrepancies until May of 1995 which was after the completion of refueling outage 1R12.

The area where the units are mounted is not readily accessible in that they are approximately 20 feet above the next lower elevation flooring. Therefore, initial visual inspections during 1R11 were conducted from a distance. Design documentation for the RBC Units identified that the units were seismically mounted with bolts. However, the visual inspection revealed that the units were not bolted, but appeared to be welded instead. Additional walkdowns, conversations with various plant personnel knowledgeable in the original construction of ANO-1, and design engineering judgment provided reasonable assurance that the units were welded.

Based on the adequacy of previous SQUG walkdown inspection findings for all other major components and the appearance that the units were welded, the decision was made to defer a more detailed inspection of the units, to correct the as-built drawings, to refueling outage 1R12 which was still within the program scope. During 1R11, appropriate notations were made on the Seismic Walk Down Screening Sheets and plans were made to gather the as-built weld data during 1R12. The follow-up inspections of the RBC Units during refueling outage 1R12 revealed that the units were neither bolted or welded.

NRC Inspection Report 50-313/95-03; 50-368/95-03 states in section 5.2 that "The significance was based on the plant operating for a full cycle with a known, potentially significant deficient condition existing and no action was taken to address the condition." Based on the reasonable assurance that the RBC Units were welded, the actual deficient condition was not identified until 1R12. The condition was immediately documented and was corrected before the unit was started up.

Therefore, the reason the initial inspection of the RBC Units failed to identify that the units were not seismically mounted was an error in judgment in accepting the remote visual inspection conclusion that the RBC Units were seismically mounted.

(2) Corrective steps that have been taken and the results achieved:

Upon identification of the actual plant condition, a Condition Report (CR-1-95-272) was initiated. This CR was made "significant" based on the potential significance for equipment failure. Subsequent "past operability" reviews of the RBC Units in this condition has determined that the units would have performed their required safety function.

A limited design change package (LCP 95-5003) to properly anchor the RBC Units was developed and installed in 1R12, prior to Unit 1 entering a mode where the RBC Units were required to be operable.

No further examples of unanchored equipment within the scope of the USI A-46/IPEEE review effort were identified

The individuals who concluded that the RBC Units were welded have been instructed concerning the necessity of obtaining conclusive evidence of actual conditions when conditions that are in question arise.

(3) Corrective steps that will be taken to avoid further violations:

The corrective steps that have been taken are adequate to avoid further violations.

(4) Date when full compliance will be achieved:

Full compliance was achieved on March 21, 1995 when the Reactor Building Coolers were seismically mounted.