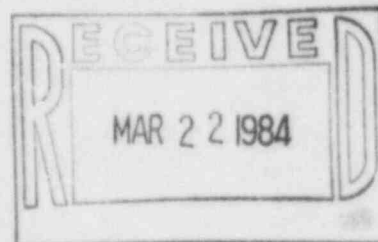




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March 20, 1984



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Mr. Richard P. Denise, 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
50-313/83-34 & 50-368/83-34

Gentlemen:

We have reviewed the subject inspection reports. Responses to the "Notice of Violation" and the "Notice of Deviation" are attached. As discussed with Mr. Johnson of your staff, transmittal of this response was delayed due to an administrative oversight.

Very truly yours,

John R. Marshall
Manager, Licensing

JRM:RJS:sc

Attachment

cc: Mr. Richard C. DeYoung
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Norman M. Haller, Director
Office of Management & Program Analysis
U. S. Nuclear Regulatory Commission
Washington, DC 20555

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NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of December 1-31, 1983, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following violations were identified:

A. Use of a Radiation Monitoring Instrument That Was Not Calibrated - Units 1 and 2

10CFR50, Appendix B, Criterion V requires that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Radiation Protection Procedure 1632.01, Revision 2, "Portable Survey and Monitoring Instruments," has been established in accordance with Criterion V.

Section 5.3 of Procedure 1632.01 requires that portable radiation monitoring instruments, such as the Eberline Model RM-14 ("frisker"), be inspected prior to use by health physics personnel to ensure that the instruments have a valid (in-date) calibration sticker.

Contrary to the above, on December 7, 1983, an Eberline Model RM-14 portable radiation monitoring instrument, identified as instrument RMPC 046, was put in use at the controlled access exit area of the Unit 1 auxiliary building without having a valid calibration sticker. The calibration sticker indicated that the instrument was last calibrated on April 28, 1983, and was due to be recalibrated on October 21, 1983.

This is Severity Level IV Violation. (Supplement IV) (313/8334-01; 358/8334-01)

RESPONSE:

In response to Item A, "Use of a Radiation Monitoring Instrument That Was Not Calibrated," the following corrective steps were taken. The instrument was immediately removed from controlled access and tagged as out of service. The instrument was recalibrated and found to be satisfactory without adjustment. All other HP instruments in use were checked for current calibration - all were satisfactory.

To avoid further violation, the responsible individual for checking out the instrument who was a temporary contractor, was released from duty the same day as the occurrence. During the normal pre-shift information meeting the following day, HP personnel (including contractors) were informed of the incident and of the consequences. The documentation of the incident was placed in the HP required reading. The date of full compliance achievement was January 16, 1984.

B. Use of Test Equipment That Did Not Have a Current Calibration - Unit 2

Unit 2 Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering... a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33...."

Instrumentation and Control Periodic Test Procedure 2304.115, Revision 4, "Reactor Protective System Response Time Test Channel D," has been established in accordance with this Technical Specification.

Step 5.2 of Procedure 2304.115 requires that personnel performing the test verify that the test equipment calibration dates are current prior to their use.

Contrary to the above, on December 7, 1983, the NRC inspector observed that a visicorder being used to perform reactor protective system response time testing on channel 'D', in accordance with Procedure 2304.115, did not have a current calibration. The visicorder is required to be calibrated prior to use ("on demand"), but was last calibrated on February 15, 1980.

This is a Severity Level V Violation. (Supplement I) (368/8334-02)

RESPONSE:

Procedure 2304.115 is a Response Time Test procedure for Unit II RPS Channel "D". While performing this procedure a visicorder was used for the purpose of recording response times for various functions. This procedure, like other I&C procedures, requires verification that all test equipment is in current calibration. These recorders are normally not kept calibrated. Rather, they are marked with a "Calibrate on Demand" sticker in accordance with Procedure 1035.05, "M&TE Calibration and Repair." Therefore, it is necessary for the user to insure calibration prior to use.

There are two methods used for calibration of recorders. One is to calibrate the recorder after it is setup for the test utilizing the beginning and/or end of the test record as a record of calibration. The other method is to bench calibrate the recorder before putting it in service. The most preferred method depends on the type of recorder and the test function. For time measurement the recorder is usually bench calibrated.

Contrary to this requirement the recorder in use (REC-011) was not in current calibration. The date due for recalibration was February 15, 1981.

Through an oversight, the first test of Procedure 2304.115, Controlled Copy #102, Job Order 54370, was conducted in December 1983 using this recorder. When discovered that this recorder was out of calibration, it was removed from service and returned to the calibration laboratory. The recorder was then calibrated and returned to service for completion of the test. The recorder was found to be in calibration.

The failure in Item B was a case of overlooking the "Out of Calibration" condition of the recorder. All persons involved are aware of the requirements. Each has been reminded of this requirement and the seriousness of this situation.

These apparent violations will be discussed with each Technician before April 1, 1984. Specifically, we will retrain the Technicians and Supervisors in the use of Test Equipment relating to the acceptability of M&TE and in the need for records keeping. A training record will be made of this retraining.

C. Failure to Follow Procedures for Recording of Measuring and Test Equipment (M&TE) Identification Number - Unit 2

Unit 2 Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented, and maintained covering ... a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33...."

Plant Administrative Procedure 1000.14, Revision 6, "Control of M&TE and Standards," has been established in accordance with this Technical Specification.

Step 6.2.4 of Procedure 1000.14 requires that, "The M&TE identification number shall be recorded on the job order, surveillance test data sheet, procedure, etc., to establish traceability."

Contrary to the above, the reactor protective system response time test for channel 'C' was performed on November 8, 1982, in accordance with Procedure 2304.114, but the M&TE identification number for the visicorder required by Step 3.1 of this procedure was not recorded on any associated test documentation.

This is a Severity Level V Violation. (Supplement I) (368/8334-03)

RESPONSE:

While reviewing previous records, the inspector found Procedure 2304.114 Controlled Copy #102, Job Order 29994 on file for record of Unit II RPS Channel "C" Response Time Test for the 2R-2 Surveillance Test.

This document did not indicate that a recorder was used. The record is normally entered on page one of the procedure.

Recorder traces were attached to the procedure and the technician that performed the test verified that he had used REC-013. His recorder was in current calibration at the time of the test. The recorder was calibrated September 18, 1982 and used between that date and November 8, 1982.

After this discovery the plant records were updated to reflect this information. Page one of the procedure, from microfilm was updated by the I&C Supervisor and turned in to Data Entry for recording.

The failure in Item C was that of failing to make a complete record of the Test Equipment used. As described in Item B, each individual was reminded of the requirements and necessity for compliance.

This apparent violation will be discussed with each Technician before April 1, 1984. Specifically, we will retrain the Technicians and Supervisors in the use of Test Equipment relating to the acceptability of M&TE and in the need for records keeping. A training record will be made of this retraining.

NOTICE OF DEVIATION

Based on the results of an NRC inspection conducted during the period of December 1-31, 1983, and in accordance with NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987, dated March 9, 1982, the following deviation was identified:

Failure to Meet a Commitment Relative to Reactor Trip Breaker Maintenance

By a letter dated April 5, 1983, the NRC Office of Nuclear Reactor Regulation issued to the licensee a Safety Evaluation Report (SER) concerning the Unit 1 reactor trip breakers (RTBs). Section III.E of this SER documents contain commitments the licensee made relative to improving the maintenance procedures for the RTBs. One such commitment requires that if any out-of-tolerance conditions are found during maintenance on the RTBs, a review of the conditions of failure by the quality assurance and engineering staffs would be provided.

In deviation from the above, a review of the conditions of failure by the quality assurance and engineering staffs was not provided for the approximately eighteen out-of-tolerance conditions that were found while performing maintenance on the RTBs (Procedure 1405.17) during the period November 5-11, 1983. (313/8334-02)

RESPONSE:

With regard to the Unit 1 Reactor Trip Breaker (RTB) procedures in question, the procedure packages have been provided to engineering for review as of February 15, 1984. The packages were in use until February 1, 1984 for reference in completing Reports of Abnormal Conditions (RACs) associated with the performance of the procedures. With the Unit 2 outage demands and RAC loading imposed on the Electrical Maintenance group, the procedures could not be reviewed during December 1983, due to manpower constraints. They were reviewed during January 1984, in conjunction with the RAC's generated during surveillance of the Unit 2 Reactor Trip Breakers. The RAC's provide a preliminary assessment of the impact of the out of specification conditions. The Unit 1 procedures have been submitted to Engineering. It was felt that initially this "bulk" transmittal would be most effective in accounting for the records and establishing the Engineering Review Program.

To prevent recurrence, the restoration and close out sections for both the Unit 1 and Unit 2 breaker PM procedures have been changed to assure the records are provided to Engineering and Quality Assurance (Quality Control).

PC-1 to 1405.17, Rev. 3, was incorporated December 8, 1983.

PC-2 to 2405.17, Rev. 3, was incorporated December 9, 1983.

The mechanism is now in place to insure that out of tolerance indications are provided to Engineering and Quality Assurance (represented by ANO Quality Control Dept.) personnel for review. Engineering review is in progress and is considering these 18 out-of-tolerance indications along with

findings from other PMs on the breakers. Engineering evaluation on these PM findings is expected to be complete by April 1, 1984. Quality Assurance evaluation is expected to be complete by April 15, 1984.