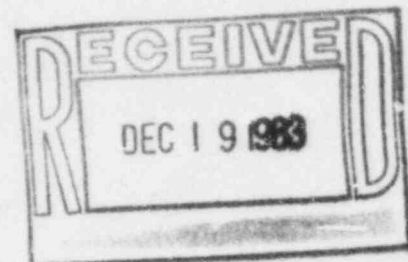




ARKANSAS POWER & LIGHT COMPANY
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000
December 9, 1983



ØCAN1283Ø5

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
NRC Inspection Oct. 31 - Nov. 4, 1983

Gentlemen:

During the week of October 31 thru November 4, 1983, Mr. Charles Hackney was at Arkansas Nuclear One to review the status of NRC open items associated with Emergency Planning. Although these issues had been previously addressed by AP&L correspondence, we dedicated five personnel from the Emergency Planning staff full time to assist the inspector in his review. In addition, considerable ANO and corporate management attention was devoted to review the status of items we believed should have been closed but which the inspector had retained as open items. (This letter documents the results of review activities conducted during the inspector's visit and provides our status of commitments to resolve items identified during the week)

During the week of the inspection, 125 NRC open items were discussed. The disposition of these items was as follows:

- 66 - These items were closed during the meeting based on information previously submitted in correspondence or on information obtained during the discussions. These items are listed in Attachment 1.
- 18 - Corrective actions had been taken by AP&L, but these would remain open pending future exercise observation. These are listed in Attachment 2.
- 6 - Our responses had been provided, but had not yet been reviewed by NRC. Therefore, these would remain open by NRC. These are listed in Attachment 3.

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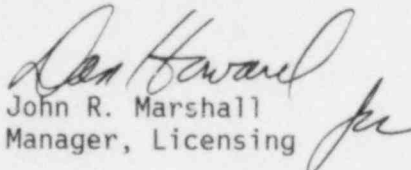
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December 9, 1983

- 1 - This item (Criterion C-1b) remained open pending NRC's response requested by our June 30, 1983 letter (ØCANØ6832Ø).
- 17 - As committed in our June 30, 1983 letter (ØCANØ6832Ø), these items have been completed. Since these items were not due for completion until November 30, they (generally) were not discussed during the inspection. The inspector indicated that these items will remain open pending further inspection results. An accounting of these items and the reference section of the Emergency Plan are provided in Attachment 4.
- 17 - During discussions of these items, it was determined that additional actions were required by AP&L before they could be closed. Six of these have subsequently been closed via corrective action taken in Emergency Plan Amendment No. 9, dated November 30, 1983. Specific actions for the remaining 11 are provided herein with appropriate completion dates. The information contained in Attachment 5 provides our position and/or status regarding completion of all these items.

As indicated by the above accounting of the 125 items, AP&L has attempted to be responsive to closing out these open items. In fact, as of the meeting date all but 17 of the 125 items had action taken and were considered closed by AP&L. Additionally, per commitments made in our June 30, 1983, response (ØCANØ6832Ø) these 17 items were not scheduled for completion until November 30, approximately one month beyond the dates of the subject inspection. We request that your staff take those actions necessary to expeditiously remove these items from the list of open items. We likewise will proceed in an expeditious manner to meet those additional commitment dates made for the 11 remaining items for which we are responsible.

Very truly yours,


John R. Marshall
Manager, Licensing

JRM:LVP:s1

Attachments

ATTACHMENT 1

LIST OF CLOSED ITEMS

Emergency Preparedness Appraisal Conducted August 3-14, 1981

Appendix A Items:

313/81-22-21; 368/81-21-21
313/81-22-34; 368/81-21-34

313/81-22-73; 368/81-21-73
313/81-22-74; 368/81-21-74

Appendix B Items:

313/81-22-02; 368/81-21-02
313/81-22-03; 368/81-21-03
313/81-22-04; 368/81-21-04
313/81-22-05; 368/81-21-05
313/81-22-06; 368/81-21-06
313/81-22-07; 368/81-21-07
313/81-22-08; 368/81-21-08
313/81-22-11; 368/81-21-11
313/81-22-17; 368/81-21-17
313/81-22-19; 368/81-21-19

313/81-22-23; 368/81-21-23
313/81-22-27; 368/81-21-27
313/81-22-47; 368/81-21-47
313/81-22-60; 368/81-21-60
313/81-22-61; 368/81-21-61
313/81-22-89; 368/81-21-89
313/81-22-91; 368/81-21-91
313/81-22-92; 368/81-21-92
313/81-22-97; 368/81-21-97

Appendix C Items:

313/81-22; 368/81-21

A-1a	E-1	I-9	P-1
A-3	E-3	J-2	P-6
B-2	E-4	J-3&4	P-7
B-4	E-6	J-7	P-10
B-6	E-7	J-10b	
C-2b	H-5a	J-10m	
C-3	H-5b	N-1	
C-4	H-6a	N-2e	
D-1	H-6b	O-2	
D-2	I-1	O-3	

1982 Emergency Preparedness Exercise Items

313/82-11-04; 368/82-09-04
313/82-11-07; 368/82-09-07
313/82-11-10; 368/82-09-10
313/82-11-14; 368/82-09-14

313/82-11-70; 368-82-09-70
313/82-11-74; 368/82-09-74
313/82-11-91; 368/82-09-91

1983 Emergency Preparedness Exercise Items

313/83-05-03; 368/83-05-03
313/83-05-05; 368/83-05-05

ATTACHMENT 2

The following are considered open items by NRC. Although corrective action has been taken by A&L, these items will remain open until observed in an upcoming exercise.

1982 Exercise Items

313/82-11-13; 368/82-09-13
313/82-11-16; 368/82-09-16
313/82-11-25; 368/82-09-25
313/82-11-26; 368/82-09-26
313/82-11-32; 368/82-09-32
313/82-11-33; 368/82-09-33
313/82-11-49; 368/82-09-49
313/82-11-55; 368/82-09-55
313/82-11-57; 368/82-09-57
313/82-11-58; 368/82-09-58
313/82-11-73; 368/82-09-73
313/82-11-80; 368/82-09-80
313/82-11-84; 368/82-09-84
313/82-11-89; 368/82-09-89

1983 Exercise Items

313/83-05-02; 368/83-05-02
313/83-05-04; 368/83-05-04
313/83-05-06; 368/83-05-06
313/83-05-07; 368/83-05-07

ATTACHMENT 3

AP&L has completed corrective action on the following items; however, NRC action is required in order to close them out.

The items listed below are open pending a review of corrective action by an NRC meteorological specialist. These items are from the Emergency Preparedness Appraisal of August 1981.

313/81-22-48; 368/81-21-48
313/81-22-49; 368/81-21-49
313/81-22-50; 368/81-21-50
313/81-22-51; 368/81-21-51
313/81-22-52; 368/81-21-52
313/81-22-53; 368/81-21-53

ATTACHMENT 4

Criterion C-1c

Information identifying state and local resources (such as air fields, command posts, etc.) has been included or referenced in Section 5.3.3.21.

Criterion F-1

Organizational titles and alternates for both ends of the communication links have been included for the principal contact as Figure 19.

Criterion F-2

Section 6.5.3 has been amended to include a brief description of the communications capability between St. Mary's Hospital and the Pope County Ambulance Service.

Criterion G-2

Section 2.2 has been revised to include a description of the transient brochure/distribution program.

Criterion H-1 & H-2

Section 7.0 has been revised to include a statement that the emergency facilities and equipment were designed to meet the intent of Supplement 1 to NUREG-0737. A brief description of the radiation monitoring equipment for the TSC has been added to Section 7.1.2. Diagrams depicting the location, size, and layout of the TSC, ECC, and the alternate TSC and ECC are contained in the Nuclear Contingency Plan. Refer to Section 7.1.4 of the Emergency Plan for more detail.

Criterion H-4

Sections 7.1.2, 7.1.3, and 7.1.4 have been revised to incorporate projected time to fully activate the emergency response facilities (i.e., TSC, OSC, and ECC). Procedure 1903.30, "Plant Evacuation," and Nuclear Contingency Plan Procedure 15, "Emergency Control Center Evacuation," describe the methods and procedures to be used to assure that functional continuity will be maintained during emergency response facility evacuations.

Criterion H-10

Section 8.3 has been revised to include a statement concerning equipment calibration intervals.

Criterion H-12

Section 7.3.2 had been revised in Emergency Plan Amendment No. 4, dated May 3, 1982, to indicate that a central point has been established for receipt and analysis of field monitoring data and coordination of sample media. This explanation has now been expanded.

ATTACHMENT 4 (Continued)

Criterion I-2

Appendix G has been revised to include a brief description of our Gaseous Radiation Effluent Monitoring System and Post Accident Sampling System which can be used for emergency assessment and monitoring.

Criterion I-7 & I-8

Section 7.3.2 has been revised to describe the field monitoring capabilities and resources. Figure 20 has been provided to indicate field sampling points within the 10-mile EPZ.

Criterion I-10

Appendix D has been revised to include a brief description of the "Radiological Plume Tracking and Dose Integration" procedure.

Criterion J-1

Section 6.4.1.1 has been revised to include a brief description of the means used and the time required to warn onsite personnel and exclusion area personnel. The criteria for the exclusion area evacuation have been included in the Plan.

Criterion J-5

Section 6.4.1.1 has been revised to address onsite personnel accountability.

Criterion J-6

A new procedure for the administration of Potassium Iodide has been implemented. This procedure is consistent with the Management Directive discussed in our June 30, 1983 letter (ØCANØ6832Ø). Upon receipt of an inventory of Potassium Iodide, provisions will be made for establishing guidelines for inventory control.

Criterion J-10a

A map of pre-selected sampling points has been included as Figure 20.

Criterion M-1 thru M-4

Section 9.0 has been expanded to address recovery and re-entry criteria, duties, and actions.

Criterion P-9

Section 8.2 has been amended to add a description of the annual independent audit of the Emergency Preparedness Program.

ATTACHMENT 5

- 313/81-22 and 368/81-21 (Criterion B-1):
 - The Plan does not adequately describe the onsite emergency organization of plant staff personnel for all shifts and its relationship to the responsibilities and duties of the normal staff complement. For each shift, specify the types and number of personnel on duty, what their regular duties are, and how their duties would change during an emergency.
 - The Plan does not clearly and unambiguously define its authority which "assigns specific duties to members of the Emergency Organization" (see page 8 of the Plan).
 - The Plan does not unambiguously identify the authorities of all persons assigned to the Emergency Organization which would enable them to perform their "assigned" tasks.
 - The Plan does not identify, for each emergency duty position, the primary and alternate person, by name or normal duty title, who is trained and otherwise qualified to fill the position.

Response:

AP&L originally responded to this item in our June 30, 1983 (ØCANØ6832Ø) letter stating that:

"Figure 10 of the ANO Emergency Plan specifies the types and number of personnel on duty and available for recall. Figure 11 describes the onsite emergency organization of plant staff personnel for all shifts. Nuclear Contingency Plan Procedure Number 1 identifies the primary and alternate person by name and normal duty title for each emergency duty position.

Personnel are assigned to the ANO Emergency Organization per Procedure 1903.02, "Assignment of Plant Emergency Team Members." Each Emergency Response Organization (ERO) member is issued a Letter of Assignment which includes a statement that identifies the authorities of ERO personnel."

We believe this response answered the above finding. However, during the subject inspection an additional concern was identified. It was our request that open item 313/81-22 and 368/81-21 (Criterion B-1) be closed based on our June 30, 1983, response since it addressed the specific finding and no problems with that response had been identified. This was denied by the inspector as not a valid request. We continue to request this "new finding" be identified as such in order for documentation to reflect that appropriate responses to open items have been made by AP&L in a timely manner.

ATTACHMENT 5 (Continued)

Specifically, it was noted that the "senior management" position listed in Figure 10 of the Emergency Plan is not, but should be, the position responsible for activation of the EOF as specified by Table B-1 of NUREG-0654. Additionally, it was stated that NUREG-0696 specifies a one-hour staffing time for the EOF upon declaration of a site area emergency, and that this "senior management" should be available at the EOF within that time. Regarding this additional item, we have the following comments.

We have stated that Figure 10 is intended to reflect only the minimum onsite staffing requirements and is, therefore, consistent with Criterion B-1 of NUREG-0654. At AP&L, this senior management position is filled by the Duty Emergency Coordinator who, by our Plan, is responsible for handling all EOF functions (from the TSC) until relieved by the Recovery Manager or Incident Response Director (IRD). Activation of the EOF (when required) is accomplished under the direction of the IRD who will arrive onsite within six hours of the appropriate declaration. In the interim period (between declaration of an appropriate emergency class and activation of the EOF), supplemental support for accomplishment of EOF functions will be provided by the Little Rock Corporate Offices staff which will in turn activate the Little Rock Support Center. Depending upon the time of day and weather conditions, supplemental support can be available within 1-2 hours and will continue under the direction of the DEC (or Recovery Manager) until responsibility for the EOF functions are assumed by the EOF staff under the direction of the IRD. We believe this staffing arrangement satisfies the guidance criteria of Table B-1 of NUREG-0654 and NUREG-0696, and provides for a practical and orderly transition of responsibility.

However, to address this concern the IRD position will be added to Figure 10 under the representation for "senior management." The DEC position will also remain there to indicate the senior management function is filled until the EOF is staffed. As stated above, staffing of the EOF will be accomplished within six hours of the appropriate declaration. This will be indicated by Figure 10 and Section 7.1.4 of our Plan. This revision is scheduled for approval by January 15, 1984.

We believe the above comments provide an adequate response to the original and "new" findings. This completes our response.

- 313/81-22 and 368/81-21 (Criterion B-3):

- The Plan does not contain a clear line of succession for the Duty Emergency Coordinator position nor does it specify the conditions for higher level utility officials assuming this function.

Response:

The Incident Response Director and Recovery Manager position descriptions in Section 5.3.1 of the ANO Emergency Plan have been revised to be consistent with the description in Section 5.2.2 of the ANO Emergency Plan which concerns the line of succession for the Duty

ATTACHMENT 5 (Continued)

Emergency Coordinator position. This revision has been incorporated into Amendment Number 9 to the ANO Emergency Plan, dated November 30, 1983.

• 313/81-22 and 368/81-21 (Criterion B-5):

- The Plan does not fulfill either the scope or the intent of this criterion. No table, similar to Table B-1 of NUREG-0654, Rev. 1, is incorporated into the Plan, nor is any other method apparent which supplies the required information regarding shift manning and augmentation.
- The exact meaning of the statement on page 11 of the Plan that "full augmentation" by the members of the Initial Response Organization who are not onsite at the time of the incident" must be clarified.

Response:

In our April 29, 1983 (ØCANØ48317) letter, we stated that:

"Figure 10 of the ANO Emergency Plan was revised in Amendment 6, dated September 20, 1982, to include minimum staffing requirements. Per AP&L's letter to Mr. W. C. Seidle dated January 14, 1983 (ØCANØ183Ø6), we committed to further amend Figure 10 to identify the responsible positions/titles for carrying out the notification/communication function. This modification has been included in Amendment 7 to the ANO Emergency Plan."

We believe this response answered the finding as stated above; however, the inspector stated this item would remain open for the same reason as open item 313/81-22 and 368/81-21 (Criterion B-1). Our response to this item is the same as given above for item 313/81-22 and 368/81-21 (Criterion B-1). This completes our response.

• 313/81-22 and 368/81-21 (Criterion B-7):

- The Plan does not address this criterion. The information is contained in the Nuclear Contingency Plan but no reference is made to that document. Further, there is no specific criteria identified which would be used to determine when and exactly how much of the Augmentation Emergency Response Organization would be activated.

Response:

Section 5.3 of the ANO Emergency Plan has been revised to address the activation of the Initial Response Organization and the Emergency Response Organization. This revision has been incorporated into Amendment Number 9 to the ANO Emergency Plan, dated November 30, 1983.

ATTACHMENT 5 (Continued)

- 313/81-22 and 368/81-21 (Criterion K-3, K-6, K-7):
 - The Plan does not contain enough information to permit adequate evaluation. The cross-reference index refers to Appendix D, Emergency Plan Implementing Procedures; Appendix E, Emergency Supplies and Equipment; and Radiation Protection Procedures without identifying those specifically addressing the criteria requirements. A review of Appendices D and E failed to uncover any information pertinent to the criteria. Radiation Protection Procedures are not available for review.
 - The Plan does not clearly describe the provisions made to ensure that a capability exists to determine and record doses received by emergency workers on a 24-hour-per-day basis, nor the methods to ensure that dosimeters are read at appropriate frequencies.
 - The Plan does not specify action levels of determining the need for decontamination nor does it establish the means (equipment, manpower, supplies, and procedures) for such required decontamination with subsequent remonitoring.
 - The Plan does not establish a definitive program to govern the control of contamination during an emergency nor the criteria for permitting return of areas and items to normal use.
 - The Plan does not include a detailed description of the means of providing the capability for decontamination of onsite personnel and equipment which may be required to be relocated offsite during an emergency, including the provision of extra clothing, decontaminants, and capabilities to detect and remove radioiodine and contamination of the skin.

Response:

Section 6.4.4 has been added to the ANO Emergency Plan to address these criteria and reference the applicable radiation protection procedures that contain more detailed information. Specifically, we have addressed the fact that:

- specific actions have been undertaken to implement thorough measures to determine and record individual exposures on a 24-hour per day basis;
- specific radiation protection equipment is available and read at specified frequencies;
- specific criteria for personnel contamination, contamination removal, and contamination control have been identified; and
- supplies and detection instrumentation are maintained.

This addition has been incorporated into Amendment Number 9 to the ANO Emergency Plan, dated November 30, 1983.

ATTACHMENT 5 (Continued)

- 313/81-22 and 368/81-21 (Criterion N-2d):

Radiation monitoring drills do not include provisions for communications and recordkeeping.

Response:

Provisions will be added to the Emergency Response Training Program procedure for demonstrating communications and recordkeeping capabilities. The corporate training procedure will be revised by January 30, 1984, to address the radiation monitoring drills for the ECC staff.

- 313/81-22 and 368/81-21 (Criterion O-4):

A training program for police and security personnel, onsite repair and damage control/correctional teams, Civil Defense/Emergency Service personnel, and personnel responsible for transmission of emergency information and instructions are not addressed in the Plan.

Response:

Section 8.1.1 of the ANO Emergency Plan has been revised to address training for offsite agencies that might respond to an emergency at ANO. This revision has been incorporated into Amendment Number 9 to the ANO Emergency Plan, dated November 30, 1983.

- 313/81-22-01 and 368/81-21-01:

Develop and implement explicit and specific functional responsibilities and authorities for the various emergency preparedness planning and coordination functions. (Section 1.5)

Response:

Section 8.4 of the ANO Emergency Plan and Section VII of the Nuclear Contingency Plan has been revised to include a description of the Emergency Planning Coordinator's responsibilities. Also, an organizational chart depicting the reporting scheme for the Emergency Planning Coordinators has been added to both plans. These revisions have been incorporated into Amendment Number 9 to the ANO Emergency Plan, dated November 30, 1983, and into Amendment Number 3 to the ANO Nuclear Contingency Plan, dated November 30, 1983.

- 313/81-22-09 and 368/81-21-09:

Develop and implement a program for training individuals who are assigned emergency action responsibilities which will enable them to attain and maintain a state-of-the-art knowledge in the field of their assigned emergency action areas. (Section 2.1.2)

ATTACHMENT 5 (Continued)

Response:

Procedure 1063.21, "Emergency Response Training Program," will be revised to enhance the training requirements for personnel assigned to the Emergency Response Organization. This procedure revision is scheduled for completion by January 30, 1984.

- 313/81-22-12 and 368/81-21-12:

Develop and implement specific selection and qualification criteria for individuals assigned to perform emergency actions and decision making. (Section 2.1.2).

Response:

Position Task Analyses (PTA's) for use as selection criteria will be developed for the Duty Emergency Coordinator, Recovery Manager, Tech Support Manager, Assistant Incident Response Director, and Incident Response Director in the Emergency Response Organization. These PTA's will yield specific selection and qualification criteria for these key positions. The PTA's are scheduled for completion on March 30, 1984.

- 313/81-22-20 and 368/81-21-20:

Provide initial training and at least annual retraining to all individuals, organizations, and agencies that are expected to respond to an emergency at an ANO facility. This training shall include, but not be limited to, normal classroom training, hands-on experience, drills (as described in NUREG-0654, Item 0.2), and demonstrations of proper techniques. The material and subject matter to be covered shall include, but not be limited to, the Emergency Plan, all relevant emergency procedures, duties, authorities, responsibilities, emergency equipment, hazards associated with performing emergency functions, and communications. (Section 3.0).

Response:

Procedure 1063.21, "Emergency Response Training Program," will be revised to clarify the initial training and annual retraining requirements. The procedure will describe the assignment of specific responsibility for training duties, the initial and annual retraining of ANO site personnel, annual training of off-site personnel, and the conduct of drills and exercises. This procedure revision is scheduled for completion by January 30, 1984.

- 313/81-22-58 and 368/81-21-58:

Correct the EPIPs by providing sections in each procedure on prerequisites, precautions, limitations of actions, and checklists to assure that the procedure steps have been followed. (Section 5.1).

ATTACHMENT 5 (Continued)

Response:

All procedures that do not currently have checklists will be reviewed to determine if checklists would improve the human factors aspect. The incorporation of the checklists will be performed during our overall upgrade of all EPIP's scheduled for completion by September 30, 1984.

- 313/81-22-81 and 368/81-21-81:

Develop and implement procedures to handle rumors and provide the public with accurate information during emergencies. (Section 5.4.7).

Response:

The Emergency Communications Procedures have been previously developed to describe how information releases should be handled to minimize contradictions and confusion. These procedures will be included in the Nuclear Contingency Plan and Implementing Procedures by January 15, 1984.

- 313/81-22-90 and 368/81-21-90:

Evaluate the status of training of offsite response personnel, develop a listing and course description of the types of training the licensee could provide for offsite response personnel, and offer initial training and annual retraining classes (in addition to the training received by participation in exercises and drills) to all offsite response organizations. (Section 6.1).

Response:

Procedure 1063.21, "Emergency Response Training Program," will be revised to include a listing of courses conducted by the Arkansas Nuclear Planning and Response Program. Also, the course content will be included. This revised procedure is scheduled for approval on January 30, 1984. In addition, Section 8.1.1 of the ANO Emergency Plan has been revised to address training for offsite agencies. This revision has been incorporated into Amendment Number 9 to the ANO Emergency Plan, dated November 30, 1983.

- 313/8211-38 and 368/8209-38:

Specific procedures are needed for operation of the media center, preparation and approval of releases, and conduct of briefings.

Response:

Refer to our response for item 313/8211-40 and 368/8209-40.

- 313/8211-40 and 368/8209-40:

Specific procedures and plans for rumor control are needed.

ATTACHMENT 5 (Continued)

Response:

The Emergency Communications Procedures have been previously developed to describe how information releases should be handled to minimize contradictions and confusion. These procedures (which address the above-described two items) will be included in the Nuclear Contingency Plan and Implementing Procedures by January 15, 1984.

- 313/8305-01 and 368/8305-01:

Provide respiratory equipment and protective clothing for emergency TSC personnel.

Response:

Twenty-five (25) full-faced respirators and sets of protective clothing will be provided for use by the TSC staff. This equipment should be in place by March 1, 1984.