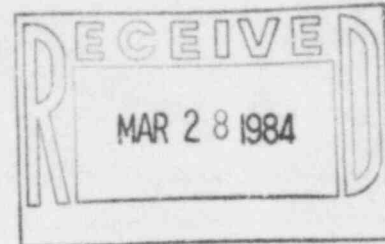




ARKANSAS POWER & LIGHT COMPANY
POST OFFICE BOX 551 LITTLE ROCK, ARKANSAS 72203 (501) 371-4000

March 20, 1984



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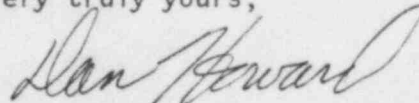

Mr. Richard P. Denise, Director
Division of Resident Reactor Projects
and Engineering Programs
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket No. 50-313 and 50-368
License No. DPR-51 and NPF-6
Response to Inspection Reports
50-313/84-01 & 50-368/84-01

Gentlemen:

We have reviewed the subject inspection report. Response to the "Notice of Violation" is attached.

Very truly yours,


 John R. Marshall
Manager, Licensing

JRM:DRH

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 AND RESPONSE

Failure to Follow Procedural Requirements for Completing Job Order Forms

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, Revision 2, February 1978."

Plant Administrative Procedure 1000.24, Revision 8, "Control of Maintenance," has been established in accordance with this Technical Specification.

Step 7.8 of Procedure 1000.24 requires that Section 5 of the document used for identifying and administratively controlling maintenance (referred to as a job order form) be filled in with either the procedure number used to perform post maintenance testing or a specific description of the post maintenance checkout that was performed.

Contrary to the above, the following job order forms for safety-related maintenance activities did not have the required entries made in Section 5:

<u>Job Order No.</u>	<u>Date Completed</u>	<u>Scope of Maintenance</u>
059307	January 9, 1984	Adjustment of packing gland on the low pressure safety injection discharge header flow control valve, 2CV-5091-1
059371	November 23, 1983	Troubleshooting/repair of the power supply breaker for the operator to the shutdown cooling system suction header containment isolation valve, 2CV-5084-1
061408	December 14, 1983	Troubleshooting/repair of the power supply breaker to the 'B' high pressure safety injection pump motor
062014	January 2, 1984	Adjustment of the stroke time for main steam isolation valve, 2CV-1060-2

This is a Severity Level IV Violation. (Supplement I) (50-368/8401-01)

RESPONSE:

A similar violation was identified in NRC inspection report 50-313/83-27. The previous violation involved a failure to make an entry in Section 5 of a JO. Following this previous violation, personnel were instructed to make such entries or to enter "not required" and a review of completed JOs was initiated to assure compliance. This specific problem did not recur in the

JOs cited above. Review of this notice of violation and discussions with the NRC resident inspector indicates a broader concern with the adequacy of documentation relative to the traceability of maintenance and subsequent testing of safety related components.

In order to address this concern the following corrective actions are being implemented. The requirements for performing and documenting post maintenance testing were reviewed with the Maintenance Superintendents and Supervisors. Discussions will also be held with the Shift Supervisors emphasizing their responsibility to require adequate documentation from craft personnel to assure that safety related equipment being returned to service has been properly tested. This will be completed by April 13, 1984.

It has been recognized by AP&L that a need exists to more clearly identify to craft personnel those technical and administrative requirements which are applicable to performing maintenance on plant equipment. To accomplish this, AP&L is in the process of augmenting the current work planning staff in order to strengthen the maintenance planning function. We anticipate that the maintenance planner will identify the technical requirements of each maintenance job including, where appropriate, the specific requirements for post maintenance testing. We believe that this longer term approach will address NRC's basic concerns and will improve documentation of maintenance actions.

The following are comments relative to the individual job orders (JOs) cited in the notice of violation.

JO 059307

This JO was initiated following observation of excessive shaft packing leakage from the shutdown cooling (SDC) flow control valve. The valve packing was subsequently adjusted by Mechanical Maintenance. This valve is not subject to ASME Section XI stroke testing nor is valve operability required by the Technical Specifications or licensing basis documents. The valve is safety related as a part of the pressure boundary, not in terms of valve operability. Therefore, no specific post maintenance checkout testing was required.

JO 059371

This JO was written after the power supply breaker to 2CV-5084-1 tripped during attempts to stroke the valve. This was subsequently determined to be due to mechanical interference in the reset linkage. Following realignment of the linkage, the valve was satisfactorily stroke tested. The testing performed and documented during the troubleshooting process adequately documented the post maintenance checkout. No specific maintenance testing was specified under Section 5 of the JO since operability testing performed by the Operations department was sufficient to document operability and was correctly documented in Section 2 of the JO.

J0 061408

This J0 was initiated following operator observation of an apparently abnormal condition relative to the position of breaker auxiliary contacts. Following examination by maintenance personnel the observed condition was determined to be a normal situation and no action was taken. Therefore, no post maintenance checkout was required.

J0 062014

This J0 was written to support other testing which was being conducted at the time (Safeguards Response Time Testing). Final testing was documented as part of the ES Response Time Testing procedure. Section 5 of the J0 was appropriately marked "not required", however, Section 2 of the J0 failed to reference the initiating procedure and its requirements for response time testing.