



ENTERGY

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10CFR2.201

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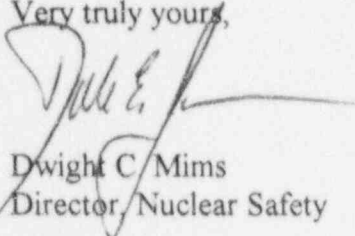
Subject: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Response To Inspection Report
50-313/97-02; 50-368/97-02

Gentlemen:

Pursuant to the provisions of 10CFR2.201, attached is the response to the notice of violation identified during the inspection activities associated with the failure to perform periodic testing of backup air accumulators for the outside air dampers in the control room emergency ventilation system.

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

Very truly yours,

for 
Dwight C. Mims
Director, Nuclear Safety

DCM/ajs

Attachments

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NOTICE OF VIOLATION

During an NRC inspection conducted on March 16 through April 26, 1997, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

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

Contrary to the above, as of February 7, 1997, established measures did not assure that leakage from Accumulator 2VRA-1B which was in excess of acceptance criteria, a condition adverse to quality, was promptly identified and corrected. The periodic accumulator performance testing proposed in response to Enforcement Action 90-175 was not being performed.

This is a Severity Level IV violation (Supplement 1) (Violation 50-313/9702-01; 50-368/9702-01)

Response to Notice Of Violation 313/9702-01; 368/9702-01

(1) Reason for the violation:

The control room emergency ventilation system includes Emergency Fan and Filter Units, VSF-9 and 2VSF-9. External air dampers CV-7910 and 2PCD-8607B, associated with VSF-9 and 2VSF-9, respectively, provide a filtered air supply path for pressurizing the control rooms during emergency ventilation system operation. In the event that a fan fails, the associated outside air damper must be closed to prevent a loss of control room pressurization. Each damper has a reserve bottle of carbon dioxide (accumulators VRA-1A and 2VRA-1B) to provide a closing force for the damper in the event that instrument air is lost.

Condition report CR-C-90-0089 was initiated in response to testing deficiencies identified during an Operational Safety Team Inspection (OSTI) conducted by the NRC in September 1990. One corrective action was to develop a procedure, which would be performed at 18 month intervals, to test the ability of the backup accumulators to maintain the external air dampers closed during a loss of instrument air. Procedure 1304.175, *ANO-1 Damper Air Consumption Test of VRA-1A and 2VRA-1B*, became effective on October 15, 1991, and the condition report corrective action was subsequently closed. However, procedure 1304.175 was never assigned a

repetitive task number and incorporated into the maintenance schedule for performance as intended. This omission resulted in the failure to perform the procedure until the condition was self-identified during a review of the instrument air system, on February 5, 1997.

The process for establishing a repetitive task is to initiate a job request identifying that the new procedure should be performed. The root cause for this omission was a program deficiency in that the responsibility for initiating a job request to perform the new procedure was not clearly defined or assigned. Had the job request been initiated, the established maintenance planning and scheduling sequence would have assured that procedure 1304.175 was performed on 18 month intervals.

In 1993, subsequent to this event, procedure 1000.006, *Procedure Control*, was revised to establish responsibility for ensuring a task is developed for procedures that must be performed periodically.

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

Procedure 1304.175 was satisfactorily performed on February 6 and 7, 1997.

Repetitive Task number 019564 was established and will result in the performance of procedure 1304.175 on 18 month intervals.

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

A review will be performed by December 15, 1997, of active procedures to verify that performance intervals have been established.

This condition and root cause will be reviewed with appropriate personnel associated with procedure development and implementation by August 29, 1997.

Procedures related to development, approval, and performance of procedures will be evaluated to ensure that criteria exists that will result in task initiation and performance. Any necessary changes will be implemented by December 15, 1997.

(4) Date when full compliance will be achieved:

Full compliance was achieved on February 7, 1997, when procedure 1304.175 was successfully completed and task number 019564 was established to perform this procedure on 18 month intervals.