



HELPING BUILD ARKANSAS

ARKANSAS POWER & LIGHT COMPANY

P.O. BOX 551 • LITTLE ROCK, ARKANSAS 72203 • (501) 371-4191

February 23, 1979

DONALD A. RUETER
DIRECTOR
TECHNICAL AND
ENVIRONMENTAL SERVICES

2-029-18

Mr. G. L. Madsen, Chief
Reactor Operations & Nuclear Support Branch
Office of Inspection & Enforcement
Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Subject: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
Inspection Report Number 50-368/78-29)
(File: 2-0232)

Gentlemen:

The following responses are submitted in response to your Notice of Violation dated January 30, 1979:

Item 1

Technical Specification 6.8.1 requires that, "Written procedures shall be established, implemented and maintained covering . . . the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978."

Contrary to the above, during a reactor startup on December 20, 1978, an operator under instruction was allowed to perform step 6.4, which withdraws the safety rods, out of sequence in the procedure 2102.08, "Approach to Criticality".

Response

This reactor startup has been discussed with the licensed operator and the trainee that were performing this startup.

This infraction was a personal error by the licensed operator. The licensed operator had participated in the zero power testing when the part length rods were moved out of sequence by an approved test procedure. Because this infraction and other infractions in this inspection

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report are related to inadequate procedure compliance, a memorandum from the Operations Superintendent on proper use of procedures and this inspection report (#50-313/78-22 & 50-368/78-29) are being reviewed by all operators in both Unit 1 & 2. This review will be completed by March 1, 1979.

Item 2

Technical Specification 3.7.11 requires that if a penetration fire barrier is non-functional, a continuous fire watch be established on at least one side of the affected penetration within one hour.

Contrary to the above, on January 11, 1979, four fire doors were found to be open or partially open and the required fire watches had not been established within one hour.

Response

This infraction has been a continuing problem due to the construction activities going on at this time.

Previous memoranda from the ANO General Manager have instructed all personnel of the requirement of the fire doors. This action has improved compliance but, as shown in this infraction the problem has not been completely solved.

On January 25, 1979, the Operations Superintendent directed the operators to check the status of all safety related fire doors on their routine plant tours. In addition, the Waste Control Operator (controlled access area) will record on his log sheet that fire doors have been checked once per shift. This action will be completed by March 1, 1979.

Item 3

Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained.

- a. Procedure 1005.17, Control of Combustibles, has been established as of October 23, 1978. Section 5.1.1 of this procedure requires that all wood used in safety-related fire zones be treated with a fire retardant or painted with a fire retardant coating.

Contrary to the above, an untreated wood ladder was observed to be inside the Engineered Safety Features Auxiliary Panel in the control room on January 11, 1979.

- b. Section 5.2.2.1 and Attachment II of Procedure 1005.17 prohibits using or storing combustible materials in a safety-related fire zone, and section 5.5.1 prohibits leaving transient combustibles unattended in a safety-related fire zone.

Contrary to the above, several cardboard cartons containing insulating material were observed to be stored in the north diesel generator room on January 11, 1979.

- c. Section 6.1.6 of Procedure 1005.04, Control and Use of Bypasses and Jumpers, requires that when the purpose of a bypass or jumper has been fulfilled, it will be removed and reinstated and a verification will be carried out and documented.

Contrary to the above, two jumpers for system 99Y were found on January 10, 1979 to have been removed but not cleared from the Jumper Bypass Log, and one jumper for system 49 was logged as having been removed but no verification of removal had been documented as of January 10, 1979.

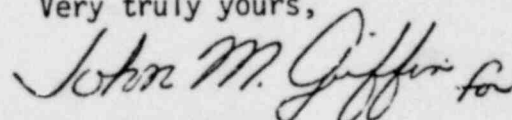
Response

In response to item 3 a; the ladder in question, left over from construction and maintenance activities, was removed from the panel. All other panels were inspected for similar discrepancies and none were noted. The ladder removed, being specially constructed to allow work within the panels, was forwarded to the maintenance shop to be treated with fire-retardant to allow future similar uses.

In response to item 3 b; the cartons were in support of insulating work in progress on the boric acid system and were subsequently removed after the inspection. Since procedure 1005.17, section 5.5.1 allows little flexibility for maintenance and repair, it is being reviewed to better define controls. This revision is expected to be complete by February 27, 1979.

In response to item 3 c; both discrepancies in the Jumper and Bypass Log were cleared the following day, 1/11/79. A memo has been written to all maintenance supervisors reiterating the requirements of procedure 1005.04 in an effort to minimize future non-compliances. Procedure 1005.04 will be reviewed with all maintenance and operations department personnel.

Very truly yours,



Donald A. Rueter

DAR:CSP:vb

cc: Mr. W. D. Johnson
U. S. Nuclear Regulatory Commission
P. O. Box 2090
Russellville, Arkansas 72801