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January 2, 1980

1-010-1
2-010-1

Mr. K. V. Seyfrit, Director
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Subject: Arkansas Nuclear One-Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
I.E. Inspection Report Nos. 50-313/79-16 and 50-368/79-14
(File: 0232, 2-0232)

Gentlemen:

We have reviewed the subject report. Attached is our response to the "Notice of Violation." Due to the recent holidays, this response is being submitted late. Through conversation with your staff, this was deemed acceptable.

Very truly yours,

David C. Trimble

David C. Trimble
Manager, Licensing

DCT:MAS:nak

Attachment

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

ITEM A

10 CFR 50, Appendix B, Criteria V, Instructions, Procedures, and Drawings and Section 5 of the Quality Assurance Topical Report (APL-TOP-1A, Rev. 4) requires that activities affecting quality be prescribed by documented procedures and accomplished in accordance with those procedures.

The licensee's procedure controlling the issuance and revision of drawings, Procedure 1004.23, Drawing Document Control, required in Paragraph 4.5 that "Drawings shall be revised and issued indicating as a minimum all system changes which have been made which affect system alignments or procedures. Such drawings should be issued and distributed even though changes may not be complete by at least seven days prior to placing the altered system into service. If system changes are incomplete, these affected portions of such drawings will have notations to that effect."

Contrary to that procedure, a Unit 1 safety related as-built drawing, M-231, was not revised and issued following the implementation of Design Change Request 79-1001, Small Break ECCS Redesign. This change involved the addition of several valves and new piping on the combined makeup and high pressure injection system. The change resulted in both a procedure revision and a new system alignment. Installation and acceptance testing was completed in May 1979. Subsequent to this modification the plant was operated.

RESPONSE TO ITEM A

Drawing M-231, Piping and Instrumentation Drawing of the Makeup and Purification System, was revised on November 1, 1979 to incorporate the changes made by Design Change Request 79-1001.

The design control and drawing control procedures are currently being revised. We are administratively constructing a program to flag design changes to operations. This program provides for a copy of the design change package to be sent to the operations superintendent after the package is approved for implementation. This package will be kept in the control room of the affected unit. The plant drawings will also be "bubbled" to indicate the portions of the drawings affected by a design package. The appropriate "bubbled" drawing will be distributed within 5 working days after the package is approved for implementation.

Full compliance will be achieved after these new procedures are implemented, but not later than February 28, 1980.

ITEM B

Unit 1 Technical Specifications (TS) 6.4.1 and Unit 2 TS 6.4.1 requires the licensee to maintain a retraining and replacement training program for the facility staff which meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971. Section 5.5 of ANSI N18.1-1971 states that a training program shall be established which maintains the proficiency of the operating organization through periodic exercises, instructions, reviews, and special training sessions. It further states that the program should provide means for evaluating the effectiveness of the training program.

RESPONSE TO ITEM B

A comprehensive revision of the Training System is currently under review by Management. The revision encompasses Item B compliance through the total modification and review of the Arkansas Nuclear One (ANO) Training Plan with objectives to provide training that meets NRC requirements plus assures safe, reliable station operation. Supportive data used in the development of the revision included: training needs assessment, 1979; contact with the airline industry; NRC Regulations and Documents; and, the many documents precipitated from all sources by the incident at Three Mile Island.

The training proposal includes and addresses total curriculum review, development, and modification as needs arise. The system designed will be ongoing to provide continued upgrading of skills within any classification. It will begin with entry-level personnel and will be sequenced for cumulative skills. Included will be structured on-the-job training for Helper classifications.

Revisions of the Training System shall also include provisions for systems training to include all new employees. Systems training for the Mechanical Maintenance, Electrical Maintenance, I&C, and Technical Support Groups is expected to begin in the first quarter of 1980.

In conjunction with the new Training System, and as part of the Station Administrative Procedure Revision Program now underway, a procedure is being developed specifically to define training procedures to include retraining requirements for all employees. An improved record keeping and tracking system has already been developed and implemented for respirator training and currently under development is requalification training per classification. Furthermore, this procedure will identify methods for evaluating the training effectiveness including pre and/or post training examinations and/or written evaluation of training by students or observers.

ITEM C

Unit 1 TS 3.1.1.3A states that the reactor shall not remain critical unless both pressurizer code safety valves are operable.

Contrary to the above, the reactor was operated subsequent to the March 24, 1978 testing of code safety valve PSV-1002 which was left with a setpoint in excess of that given in the Bases of TS 3.1 and in the acceptance criteria in the test procedure.

RESPONSE TO ITEM C

The test procedure (1401.03) states that the setpoint of the valve should be 2500 psi $\pm$ 1%. The valve was left at a setpoint of 2500 psi + 1.24%. The valve was retested on August 12, 1979, with the actual setpoint being 2500 $\pm$ 1 psi.

The individual responsible for this violation has been reinstructed regarding his responsibility for procedural compliance.

Procedure 1401.03, Pressurizer Code Relief Valve Test, was revised on September 20, 1979 to add a review of the test results. Full compliance was achieved as of August 12, 1979.

ITEM D

Unit 1 and Unit 2 TS 6.5.2.7a requires the Safety Review Committee (SRC) to review the safety evaluations for changes to equipment or systems completed under the provisions of 10 CFR 50.59 and to verify that such actions did not constitute an unreviewed safety question. Additionally, Unit 1 and Unit 2 TS 6.5.2.1 requires the SRC to perform the above described review independently.

Contrary to the above, independent reviews had not been performed. The Manager of Licensing had in-line responsibility for preparing the initial 10 CFR 50.59 review on design changes and was assigned to perform the SRC independent review of the same evaluations.

RESPONSE TO ITEM D

To provide for an independent review of the safety evaluations for changes to equipment or systems completed under the provisions of 10 CFR 50.59, Generation and Construction Procedure 201 was revised. This procedure revision designated the Manager, Nuclear Operations to do an independent review of all safety evaluations done under the provisions of 10 CFR 50.59. Full compliance was achieved on October 2, 1979, the date of implementation of the procedure revision.

ITEM E

Unit 2 TS 6.5.2.8.b requires SRC audits to encompass the performance, training, and qualifications of the entire unit staff once a year.

Contrary to the above, the SRC did not audit non-licensed training.

RESPONSE TO ITEM E

A special audit by the SRC of training records for all of the ANO staff was done in October, 1979. To prevent further noncompliance, a review of the ANO staff records will be made a part of all SRC audits of ANO activities. An audit will be done once a year, as a minimum.

ITEM F

Unit 1 TS 6.5.1.7.1.b and Unit 2 TS 6.5.1.7.b requires the Plant Safety Committee (PSC) to render determinations in writing with regard to whether or not procedures reviewed in accordance with Unit 1 and Unit 2 TS 6.5.1.6.a constitute an unreviewed safety question.

Contrary to the above, the PSC did not make written safety evaluations or render determinations in writing with regard to whether or not the procedures reviewed constituted an unreviewed safety question.

RESPONSE TO ITEM F

To correct this item of noncompliance, Station Administrative Procedure 1000.06 has been developed and put into use. This procedure requires documentation of the review of all procedures and procedure changes with regard to whether an unreviewed safety question exists. This procedure requires that the procedure writer prepare a written safety evaluation which is reviewed by management and by the Plant Safety Committee prior to approval.

ITEM G

10 CFR 19.12 requires that the licensee shall instruct employees in their responsibility to promptly report to the licensee any condition which may result in a violation of regulatory requirements or unnecessary exposure to radiation or radioactive material.

Contrary to the above, the licensee had not instructed its employees as required.

RESPONSE TO ITEM G

The sentence from 10 CFR 19.12 that was inadvertently omitted from the video taped portions of the Health Physics Indoctrination Program has been included with the oral presentation portion of the program. When the video tape is revised, the omission from 10 CFR 19 will be added.

Included in a radiation protection training program given the employees during the months of November and December, 1979, was a review of 10 CFR 19.