



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

March 6, 1980

2-030-03

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

Subject: Arkansas Nuclear One - Unit 2  
Docket No. 50-368  
License No. NPF-6  
Response to IE Inspection Report  
No. 50-368/80-02  
(File: 2-0232)

Gentlemen:

In response to the subject report, the following is provided.

NOTICE OF VIOLATION

Based on the results of an NRC inspection conducted during the period of December 22, 1979 through January 21, 1980, it appears that certain of your activities were not conducted in full compliance with NRC regulations and the conditions of your license, as indicated below:

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. As required in paragraph 1 of Appendix "A" to Regulatory Guide 1.33, Administrative Procedure 1005.01, "Administrative Controls Manual", has been established. Section 5.9 of this procedure states in part, "Procedures in the Master Plant Manual are to be followed exactly and completely, provided that by so doing an immediate hazard to personnel or plant equipment is not created."

Procedure 2.800.01, "Power Ascension Test", Appendix DD, step 2.3 states, "Prior to the trip of a CEA, the CEAC's shall be removed from service in order to avoid adverse CEAC penalty factor effects which may cause a reactor trip during the testing. The CEAC's shall be reinstated to service immediately following return of the dropped CEA back to the fully withdrawn position."

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Step 7.11 states, "Following the return of the dropped CEA to the fully withdrawn position, perform Attachment DD-2 when the COLSS Azimuthal Tilt (CV9008) has decreased below 0.04," and Attachment DD-2, step 5.0 states, "Return all CEAC's to operation and take all CPC channels out of CEANOP per OP 2105.01, unless further testing requires them to remain in CEANOP".

Contrary to the above, in January, 1980, the licensee failed to return the CEAC's to operation after returning the dropped CEA to the fully withdrawn position and after COLSS Azimuthal Tilt decreased below 0.04. Further testing did not require the CEAC's to remain in CEANOP.

This is an infraction. (50-368/80-02-01)

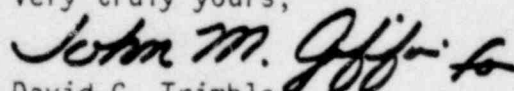
#### RESPONSE

During the preparation for the dropped CEA test, TP 2.800.01 Appendix DD, the procedure was reviewed by the AP&L Plant Analysis Superintendent, the AP&L Shift Supervisor, the Startup Test Director and the C-E Chief Test Engineer. This review concluded that since the dropped CEA test consisted of two dropped rods back to back, it was unnecessary and in fact undesirable to reinstate the CEAC's to operable status between drops. The amount of time delay between the drops was expected to be (and indeed was) relatively short, and restoring the CEAC's to operable would have required disconnecting test equipment and then immediately thereafter reconnecting it for the second rod drop.

Unfortunately, the review was not documented and no procedure change was made until after the first drop had been completed. A procedure change was initiated before the second drop was conducted, but not before the NRC resident inspector had noted the discrepancy.

Since further testing did require the CPC's to remain in CEANOP (CEAC's not operable), this change was desirable. Failure to correct the procedure was an administrative oversight which we do not believe constitutes a serious concern. The Test Director and Assistant Test Directors were reminded to follow through with a procedure change even when the proposed change has been reviewed by all necessary parties ahead of time. We do not believe further corrective action is required, especially since the ANO-2 test program is essentially complete and the parties who are primarily responsible for making such procedure changes are not permanent staff members.

Very truly yours,



David C. Trimble  
Manager, Licensing

DCT:MAS:skm

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