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October 6, 1989

1CAN108904

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Mail Station P1-137  
Washington, D. C. 20555

SUBJECT: Arkansas Nuclear One - Unit 1  
Docket No. 50-313  
License No. DPR-51  
Licensee Event Report No. 50-313/89-032-00

Gentlemen:

In accordance with 10CFR50.73(a)(2)(i)(B), attached is the subject report concerning inadequate procedural guidance which resulted in the failure to perform the reactor building area radiation monitors monthly surveillance required by Technical Specifications.

Very truly yours,

E. C. Ewing  
General Manager,  
Technical Support  
and Assessment

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NRC Form 366  
(9-83)

U.S. Nuclear Regulatory Commission  
Approved OMB No. 3150-0104  
Expires: 8/31/85

L I C E N S E E E V E N T R E P O R T ( L E R )

FACILITY NAME (1) Arkansas Nuclear One, Unit One | DOCKET NUMBER (2) | PAGE (3)  
| 015 | 010 | 01 | 31 | 11 | 11 | 01 | 013

TITLE (4) Inadequate Procedural Guidance Results in the Failure to Perform the Reactor Building Area Radiation Monitors Monthly Surveillance Required by Technical Specifications

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)				
Month	Day	Year	Sequential Number	Revision Number	Month	Day	Year	Facility Names	Docket Number(s)				
01	09	01	06	01	03	02	01	01	01	06	08	09	01501010

OPERATING MODE (9) THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

POWER LEVEL (10)	01714	20.402(b)	20.405(a)(1)(i)	20.405(a)(1)(ii)	20.405(a)(1)(iii)	20.405(a)(1)(iv)	20.405(a)(1)(v)	20.405(c)	50.36(c)(1)	50.36(c)(2)	50.73(a)(2)(i)	50.73(a)(2)(ii)	50.73(a)(2)(iii)	50.73(a)(2)(iv)	50.73(a)(2)(v)	50.73(a)(2)(vi)	50.73(a)(2)(vii)	50.73(a)(2)(viii)(A)	50.73(a)(2)(viii)(B)	50.73(a)(2)(x)	73.71(b)	73.71(c)	Other (Specify in Abstract below and in Text, NRC Form 366A)
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L I C E N S E E C O N T A C T F O R T H I S L E R ( 1 2 )

Name	Telephone Number
Dana Millar, Nuclear Safety and Licensing Specialist	5101191614-1311010

C O M P L E T E O N E L I N E F O R E A C H C O M P O N E N T F A I L U R E D E S C R I B E D I N T H I S R E P O R T ( 1 3 )

Cause	System	Component	Manufacturer	Reportable to NPRDS	Cause	System	Component	Manufacturer	Reportable to NPRDS

S U P P L E M E N T R E P O R T E X P E C T E D ( 1 4 )

Yes (If yes, complete Expected Submission Date)	No	EXPECTED SUBMISSION DATE (15)	Month	Day	Year
<input checked="" type="checkbox"/>	<input type="checkbox"/>				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On September 6, 1989, it was discovered that the monthly functional test for the reactor building area radiation monitors was not performed as required by Technical Specification. A new procedure for the testing of these monitors had been written and the monitors had been deleted from the original test procedure. A Master Test Control List (MTCL), maintained to track the testing requirements associated with Technical Specifications, should be revised whenever a procedure that may affect the MTCL is changed. Currently, there is no procedural guidance given to ensure this is accomplished. A revision to the MTCL was submitted with the revisions to the area radiation monitor procedures, however, due to an error on the MTCL revision request it was not approved at the same time the area radiation monitor test procedures were approved and implemented on June 26, 1989. The time lapse associated with the final approval of the MTCL revision resulted in the reactor building area radiation monitors not being tested as required. The subsequent satisfactory completion of the surveillance indicated the monitors were operable. To ensure that a required Technical Specification surveillance is properly identified on the MTCL, a revision to the Procedure Revision Request Form, which accompanies each procedure change, and specific procedural guidance concerning the MTCL has been initiated.

LIC/NSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Arkansas Nuclear One, Unit One	DOCKET NUMBER (2) 01510101013113189--	LER NUMBER (6)			PAGE (3) 01210F1013
		Year	Sequential Number	Revision Number	
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

A. Plant Status

At the time of occurrence of this event Arkansas Nuclear One, Unit One (ANO-1) was operating at 74 percent of rated thermal power. Reactor Coolant System (RCS) [AB] pressure was approximately 2150 psia and RCS temperature was about 579 degrees Fahrenheit.

B. Event Description

On September 6, 1989, it was discovered that the required monthly functional test of four area radiation monitors [IL] located inside the ANO-1 reactor building had not been performed within the allowable surveillance interval specified in the ANO-1 Technical Specifications. In June 1989, a procedure which contained the testing requirements for each area radiation monitor located throughout the plant was revised into two procedures, a new procedure addressing testing of only the area radiation monitors located in the reactor building and the original procedure for the testing requirements of the remaining area radiation monitors (deleting the reactor building area radiation monitors). On June 26, 1989, these two procedures were approved and authorized for use by the Plant Safety Committee (PSC).

A Master Test Control List (MTCL) procedure, which lists the surveillances that are required by Technical Specification, is used by Planning and Scheduling personnel to ensure surveillances are scheduled and performed within the required time intervals as established by Technical Specifications. Any time procedures are changed which are reflected on the MTCL, an appropriate change to the MTCL procedure may be necessary. Personnel responsible for writing or changing procedures are responsible for ensuring that the MTCL procedure is revised, if necessary. When the new procedure was written for the testing of the reactor building area radiation monitors and the original procedure was revised to delete these monitors, a MTCL revision form was prepared and submitted to the PSC, at the same time the new procedures for testing were submitted for approval. Upon review of the procedures and MTCL revisions by the PSC, the MTCL revision was found to be unacceptable and the procedure writer was notified of the need to correct the MTCL revision prior to approval by the PSC. However, the testing procedures were approved and issued. On September 6, 1989, the MTCL revision request was approved by the PSC. As a result, between June 26 and September 6 the reactor building area radiation monitors were not functionally tested, since the MTCL did not reference the new testing procedure. This error was not detected because the original procedure which had contained the testing requirements for the area radiation monitors located inside the reactor building was listed on the MTCL and had been properly scheduled and performed. Therefore, it appeared that the reactor building area radiation monitors were being tested as required by Technical Specifications. On September 6, 1989, when it was discovered that the reactor building area radiation monitors had not been functionally tested, the monitors were declared inoperable until the testing requirements were completed. The monitors were tested satisfactorily and returned to service on September 6, 1989.

C. Safety Significance

Upon completion of the functional testing of the reactor building area radiation monitors, the monitors were declared operable and returned to service. Although the surveillance requirements were not performed within the required time interval, the satisfactory completion of the testing indicated the monitors were operable, therefore, no significant safety concerns exist.

D. Root Cause

Currently, the station administrative procedure which provides guidance to personnel concerning the procedure review, approval, and revision process does not address the need to update the MTCL if necessary when a procedure which may affect the MTCL is changed. Without procedural guidance, if a change to the MTCL were necessary, the personnel responsible for writing, reviewing, or changing a procedure could only rely upon their memory to ensure the MTCL procedure was appropriately changed. Therefore, the lack of procedural guidance resulted in an unreliable means of ensuring the MTCL was properly updated.

E. Basis for Reportability

The failure to perform a surveillance within the allowable interval specified in Technical Specifications is considered to be a condition prohibited by Technical Specifications and is therefore reportable under 10CFR50.73(a)(2)(i)(B).

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		Year	Sequential Number	Revision Number	
Arkansas Nuclear One, Unit One	0151010101 31 3	89--	01 3 2 --	01	0101310F1013

TEXT (If more space is required, use additional NRC Form 366A's) (17)

F. Corrective Actions

When it was identified that the surveillance associated with the testing requirements for the reactor building area radiation monitors had not been performed within the required time interval the monitors were declared inoperable. Upon satisfactory completion of the surveillance on September 6, 1989, the monitors were declared operable and returned to service. Additionally, a change to the Procedure Revision Request Form, which is required to accompany each procedure that is submitted to the PSC for approval, has been initiated. Procedural guidance will be given and a specific entry on the Procedure Revision Request Form required for each procedure as to whether a change to the MTCL is necessary or not. In the future, if a change to the MTCL is required for a given procedure, the required effective date for the procedure to be implemented will be assigned when the MTCL is updated. This improved process provides relative assurance that the cause of missing a surveillance as a result of the MTCL not being update should not occur again.

G. Additional Information

There are no previously identified similar events which resulted in a Technical Specification surveillance not being performed within the required testing interval because the MTCL was not properly updated.

Energy Industry Identification System (EIIIS) codes are identified in the text as [XX].