



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

JE FILE COPY

September 28, 1977

Docket No. 50-313

Arkansas Power and Light Company  
ATTN: Mr. William Cavanaugh III  
Executive Director of Generation  
and Construction  
P. O. Box 551  
Little Rock, Arkansas 72203

Gentlemen:

This refers to our letter dated July 1, 1977 in response to your letter dated June 22, 1977. As mentioned in our July 1 letter, we are concerned regarding certain aspects of your Emergency Planning Program. These concerns were detailed in our letter dated May 16, 1977, with enclosed Notice of Violation and IE Inspection Report No. 50-313/77-08.

We stated in our July 1, 1977 letter that in view of the apparent disagreement between our Notice of Violation and your June 22, 1977 response, the matter was being forwarded to our Headquarters staff for resolution. The following is NRC's position regarding these items:

1. First Aid Room

This item involves Section 4.3.2.a of the ANO-1 Emergency Plan which states: "A First Aid Room is located near the Unit No. 2 controlled access entrance. The equipment and supplies available in the First Aid Room are listed in Appendix J."

It is not acceptable to have an incorrect statement in the ANO-1 Emergency Plan which could lead to confusion and misdirection. You are requested to provide a description of the method to be used to assure that confusion and misdirection are not caused. Further, you are requested to provide a description of the facilities and equipment which will be provided in the interim until the ANO-2 facilities are available.

It is your position that a verbal agreement was reached between AP&L and NRR at some time prior to issuance of the ANO-1 Operating License which permitted a delay in establishing a First Aid Room until ANO-2 construction was completed. We have searched our files and reviewed the matter with NRR, but were unable to locate any documentation which indicated that any such agreement was ever reached.

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A request to change the ANO-1 FSAR does not appear to be a practical solution since the new facilities would probably be ready before a change to the FSAR would be completed.

2. Training of Off-Site Support Agencies

Our concern regarding this item involved providing training in a timely manner. Your response indicated that you consider "annually" as being any period between two numerical years. For example, if one training session was held on January 1, 1975 and the next session on December 31, 1976, this would appear to satisfy your interpretation of "annually" even though the elapsed time involved a 24 month period. IE normally considers "annually" as being 12 months; however, our legal staff has informed us that no legal interpretation of "annually" exists. Since you indicated that training was accomplished shortly after our inspection, we feel that the inspection program achieved its purpose in assuring that training was provided. Training requirements will be one of the matters reviewed in Item 3 below.

No response to this item is required.

3. Drill Contents

We are concerned that many of the basic aspects of your Emergency Plan have not been tested during a routine drill. The scope of your past drills has been rather limited; therefore, we feel that more comprehensive drill scenarios must be developed in order to test the basic aspects of your Emergency Plan.

Regulatory Guide 1.101 was written to describe a method acceptable to the NRC for complying with the Commission's regulations with regard to the content of emergency plans for nuclear power plants. We recognize that Reg. Guide 1.101 was issued after the ANO-1 Emergency Plan was reviewed by NRR. Consequently, our Headquarters staff advised that the basis for a deviation against Reg. Guide 1.101 is questionable. It was initially hoped that by identifying certain aspects of your Emergency Planning Program which we feel are weak, you would make positive commitments to improve your program in order to satisfy present acceptable methods.

Since your response indicated that you have no intentions of making such commitments, NRK has been requested to review the ANO Emergency Plan. This review will include changes necessary in order to correct the apparent weak areas in your Emergency Plan.

Arkansas Power and Light  
Company

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September 28, 1977

No response to this item is required.

Sincerely,

*W. Johnson*  
for G. L. Madsen, Chief  
Reactor Operations and  
Nuclear Support Branch