



HELPING BUILD ARKANSAS

ARKANSAS POWER & LIGHT COMPANY

9TH & LOUISIANA STREETS • LITTLE ROCK, ARKANSAS 72203 • (501) 371-4000

May 11, 1976

Reactor Construction and Operations Branch  
United States Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region IV  
611 Ryan Drive, Suite 1000  
Arlington, Texas 76012

Attention: Mr. G. L. Madsen

Subject: Arkansas Power & Light Company  
Arkansas Nuclear One-Unit One  
Docket No. 50-313, License No. DPR-51  
IE Inspection Report No. 50-313/76-05

Gentlemen:

The subject inspection identified three violations of the Arkansas Nuclear One-Unit One Technical Specification and one violation of 10CFR50.59. Our response to each violation is given below:

1. NRC Position

Technical Specification 6.7 requires in part that procedures be prepared, approved and adhered to for preventive or corrective maintenance operations involving nuclear safety of the facility. Contrary to the above, procedures were not followed in the control of hold cards as required by procedure 1004.19, Hold, Caution and QC Tagging Procedure. This item is an infraction.

AP&L Response

It is our position that the Hold Card which was not accounted for in accordance with QCP 1004.19, Hold, Caution and QC Tagging Procedure, is an isolated case; however, the card has been removed and disposed. As affirmative action plant personnel removing hold cards have been made aware of the requirements of QCP 1004.19. It is our belief that we, at this time, are in compliance with QCP 1004.19.

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2. NRC Position

Technical Specification 6.7.3 requires that temporary changes to safety-related operating procedures which do not involve a change of intent be approved by two members of the plant staff, at least one of whom shall be a shift supervisor. Contrary to the above requirement, two temporary changes to operating procedures for safety-related systems, temporary change 1 to procedure 1104.03, revision 4, "Chemical Addition," and temporary change 2 to procedure 1103.06, revision 1, "Reactor Coolant Pump Operation," were in effect but had been approved by only one plant staff member. This item is an infraction.

AP&L Response

Temporary change 1 to procedure 1104.03, revision 4, "Chemical Addition," has been reviewed and approved by the plant superintendent and temporary change 2 to procedure 1103.06, revision 1, has been superseded by revision 2 of procedure 1103.06.

In order to avoid other noncompliances of this type, temporary changes will not be distributed until the proper endorsements are provided on the temporary change form. Full compliance will be achieved upon the resolution of section 3.c.6 (Details) of USNRC IE Inspection Report No. 50-313/76-05.

3. NRC Position

10 CFR 50.59(b) requires in part that the licensee maintain records of changes to procedures as described in the safety analysis report and that such records shall include a written safety evaluation which provides the bases for the determination that the change does not constitute an unreviewed safety question. Contrary to the above requirement, no written safety evaluation to provide the bases for determination that the change did not constitute an unreviewed safety question were maintained for three changes to procedures described in the FSAR, procedures 1102.06, revision 2, "Reactor Trip Recovery," 1202.32, revision 2, "Loss of Decay Heat Removal," and 1203.03, revision 3, "CRD Malfunction Action." This item is a deficiency.

AP&L Response

It is our contention that we are not in violation of 10CFR50.59(b). In part, 10CFR50.59(b) states, "The licensee shall maintain records of changes in the facility and of changes in procedures made pursuant to this section, to the extent that such changes constitute changes in the facility as described in the safety analysis report or constitute changes in procedures as described in the safety analysis report . . . These records shall include a written safety evaluation which provides bases for the determination that the change, test or experiment does not involve an unreviewed safety question."

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It is our position that we have not changed the purpose of procedures 1102.06, revision 2, "Reactor Trip Recovery," 1202.32, revision 2, "Loss of Decay Heat Removal," and 1203.03, revision 3, "CRD Malfunction Action" as described in the Final Safety Analysis Report.

The three procedures in which we were cited as being in violation of 10CFR50.59(b) were the latest revisions of those procedures. The purpose for revising procedures 1202.32, rev. 1, 1203.03, rev. 2, and 1102.06, rev. 1 was to incorporate technical specification changes, provide clarity, reduce the unnecessary overlapping of procedures, and provide continuity between the FSAR, Tech. Specs., and procedures. The PSC has reviewed the questioned procedure as part of its Master Plant Manual review in accordance with procedure 1005.01, "Administrative Control Manual," and section 6.4 of the Tech. Specs.

We contend that 10CFR50.59(b) does not require that all changes to procedures which are identified or listed in the FSAR have written evaluations which provides bases for the determination that the change does not involve an unreviewed safety question. Therefore, it is our belief that it is the specific nature of the change which determines the need for a written safety evaluation, and that the PSC, in its review, is responsible for identifying the need for written evaluations in accordance with 10CFR50.59(b).

4. NRC Position

Technical Specification 6.7 requires in part that detailed written procedures, covering emergency and off-normal conditions shall be prepared, approved and adhered to for all systems and components involving nuclear safety. Contrary to the above, procedures were not provided for the action to be taken in the event of dropping a group of rods in the regulating or safety groups. This item is a deficiency.

AP&L Response

It is our position that the events of dropped rod groups experienced at ANO-1 be considered an isolated case and the assigned cause was attributed to a design deficiency. A new design has been implemented which will remotely reduce the probability that a ratchet trip of the nature experienced will occur again.

The cognizant or group supervisor shall be responsible for determining the need for and development of detailed written procedures covering emergency and off-normal conditions, in accordance with QCP 1004.21.

Very truly yours,

*Donald L. Rector*  
for William Cavanaugh III  
Manager, Nuclear Services

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